



March 26, 2008  
Chairman Eric Olson  
North Pacific Fishery Management Council  
605 West Fourth Street, Suite 306  
Anchorage, Alaska 99501-2252

Dear Chairman Olson,

SEAGO (South East Alaska Guides Organization) currently represents over eighty charter fishing vessels and operators who conduct guided sport fishing for halibut and other species in Southeast Alaska waters. Our members have reviewed the draft documents EA/RIR associated with the upcoming April Council meeting agenda Item C-6 Halibut Charter Management and respectfully make the following comments and requests for your consideration.

SEAGO members have made substantial investments in vessels and lodging operations in Southeast Alaska over the past years. The social and economic value of these investments to the coastal communities of Southeast Alaska has not been properly assessed in the documents that have been prepared to date by Council staff. The impacts of the proposed actions on the charter operations will be substantial depending on what final action the Council chooses, but the informational foundations are not adequate. The EA/RIR informs the reader that the economic data is needed, but then says it is outside the scope of the analysis. A MacDowell Group study of the charter industry's economic impact in the Sitka area cited a figure of over \$30 million annual contribution to the local economy. We would suggest that the Council ask the State of Alaska to provide the staff and pursue appropriate funding to gather and analyze the data which is needed to make a fair and rational decision on this issue.

The members of SEAGO request that the council add an additional option for area 2C: Fixed poundage of 2.1-2.6 million pounds. We believe that the latent capacity and Community Qualified Entity permits that are mandated by the Council's action on the charter fishing moratorium currently under review by the Secretary

of Commerce can only be accommodated by a higher fixed allocation to area 2C. Our members also request that the Council add an additional option for area 3A: Fixed poundage of 4.5- 5.0 million pounds. The recent study completed by the ADFG of the logbook charter halibut data shows that the present options may not reflect the current harvest of halibut. We believe it is appropriate that an analysis be completed using the best available information.

We are concerned that the analysis is biased in regard to assuming that the Secretary will impose a one fish daily bag limit for 2C and that the charter operators in 2C can maintain and attract new clients under this proposed reduction. In order to remain competitive in their markets, our members require a halibut season of historical length and the two fish daily bag limit, which is currently sustainable without causing a conservation concern.

SEAGO does not believe the proposed leasing of quota shares program is a viable option to provide for the future maintenance of the charter halibut sport fishery, but we would be willing to study alternatives which may be identified in this review process.

The recent actions of the International Pacific Halibut Commission have resulted in a redistribution of fishing effort and availability of halibut resources to our operations and to the IFQ quota participants, but the immediate impacts have not been fully identified within the current analysis. The analysis needs to fully explore what other options and tools the Council could pursue to buffer the short term economic dislocation/hardship to IFQ and charter halibut participants.

Many of SEAGO's members have made large investments in shore side lodging which is necessary to conduct their destination charter fishing operations. We would like the Council to recognize that moving these facilities is clearly not a viable option. The Council should also recognize that these owners would not be able to afford the development of other facilities in new locations.

The primary issue before the Council is to establish what level of allocation to the charter halibut industry will be required to insure a thriving and consistent charter halibut industry that continues to make substantial contributions to the economies of Alaska's coastal communities. The Council should recognize that the charter halibut industry's present usage of halibut is considerably less than that which the Council routinely allocates as by catch to insure the continuation of the very important Bering Sea and Gulf of Alaska ground fish operations.

We ask that the Council review our needs for a sufficient allocation as a component of maximizing the economic benefits of the total halibut resource available for extraction, and not to view our request as merely a taking from the IFQ commercial quota.

We look forward to working with the Council family to insure that the Halibut Charter Management concerns are appropriately addressed,

Tom Ohaus  
Acting Chair, SEAGO