



January 21, 2009

Ms. Sue Salvesson
Assistant Regional Administrator, Sustainable Fisheries Division, Alaska Region
National Marine Fisheries Service
P.O. Box 21668
Juneau, AK 99802

Attention: Ellen Sebastian
Re: Comment Id. RIN 0648-AX17

Ms. Salvesson

The Southeast Alaska Guides Organization (SEAGO) represents over 80 charter boats run by lodges and guides throughout International Pacific Halibut Commission Area 2C. Our membership includes diverse business models in the guided sport fishery from large full service lodges to individuals who run a single boat. SEAGO's members are concerned for their future as we confront a deep recession and regulations that negatively impact our ability to market our businesses.

Guided sportfishing makes major contributions to the economies of our towns and villages, our region, and the State of Alaska. We encourage you to look at *Economic Impacts and Contributions of Sportfishing in Alaska*, the recently released Southwick economic study funded by the State of Alaska. (<http://www.sf.adfg.state.ak.us/statewide/economics/>) SEAGO businesses provide direct employment to hundreds of people each season and indirectly help employ many more than that in restaurants, shops, transportation, food services, fuel services, and other businesses. Thousands of American citizens visit SEAGO lodges and charter boats each year. These people make choices in a global market and their choices are very regulation sensitive.

We oppose the NMFS proposal to impose a 1 halibut daily bag limit on the Area 2C guided anglers (**RIN 0648-AX17**). Isolating one group of anglers, those who choose to fish with a guide, in a single region, Area 2C, will not result in any appreciable conservation of the resource and will result in widespread economic dislocation of charter and lodge businesses throughout the region. As made clear in *Economic Impacts and Contributions of Sportfishing in Alaska*, those economic impacts will not be isolated to charter businesses; they will ripple out into communities already hurt by the recession's impacts on tourism and other local industries. The communities of Southeast Alaska are hurting and the proposed one fish rule will make things worse.

SEAGO members share a concern for the health of halibut stocks as well as the health of local economies that depend on charter fishing. We encourage a balanced approach. Such a balance has been attempted on commercial side. In the case of Area 2C, the application of the IPHC slow up fast down policy (SUFD) has resulted in commercial IFQ allocations that exceeded the Fishery CEY by 300,000 pounds in 2006; by 900,000 pounds in 2007; and by 3.07 million pounds in 2008. This year the IPHC approved a commercial IFQ allocation that exceeded the Fishery CEY by 3.29 million pounds.

These catch limits, set by the IPHC, are well above the fishery CEY and indicate elasticity in the halibut stocks that would accommodate our need for a two fish bag limit. SEAGO feels strongly that denying the charter sector equal economic buffering to that enjoyed by the commercial sector is neither fair nor equitable. It imposes exclusive hardships on Area 2C guided sport businesses and the local economies that depend on sport fishing. This is also unfair treatment of citizens that choose to access the resource via a guided vessel.

SEAGO members experienced downward booking impacts of roughly 15% because of the published one fish rule in 2008. Although the rule was ultimately blocked by a temporary restraining order, its impacts on bookings didn't disappear. Our customers make the decision to take a trip to Alaska up to a year in advance and they want to know the bag limits before they book. The logistics of planning a fishing vacation, including booking airfare, require people to secure reservations well in advance of their planned dates. A *possible* one per day bag limit will negatively impact bookings on the order of 20% to 30%, as described in the analysis of the regulation.

Amidst uncertainty in Area 2C, many of our customers are already taking their business to other parts of Alaska or British Columbia knowing they will enjoy a 2 per day bag limit. A 20% to 30% loss of customers is enough to turn most charter businesses from money makers to money losers. SEAGO operations face that level of downturn or more in 2009.

The thousands of customers who fish aboard charter boats arrive almost exclusively on Alaska Airlines. Most spend at least one night in a local hotel and eat multiple meals in local restaurants. They shop for supplies and gifts in local stores. The unprecedented economic crisis in 2009 will surely hurt all businesses in Southeast.

SEAGO feels strongly that a two per day bag limit is vital for our businesses to remain competitive with other regions in the State of Alaska and British Columbia and our businesses are vital to local economies in Southeast Alaska. The proposed rule will fan the flames of economic meltdown in Southeast Alaska and we oppose it.

Tom Ohaus
President, Southeast Alaska Guides Organization