



## MEMORANDUM

TO: Jane Pierson, Aide – Rep. Steve Thompson/House Fisheries Committee

FROM: Heath E. Hilyard, Executive Director – Southeast Alaska Guides Organization

DATE: August 19, 2011

RE: Background on proposed Catch Sharing Plan

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As a result of my conversations with members of the House Fisheries Committee and other members of the Alaska State Legislature, I have been asked to provide a briefing that explains SEAGO's and the Alaska charter industry's concern with the Catch Sharing Plan (CSP) currently in public comment period.

While I have outlined multiple points of concern that address myriad issues presented in the CSP, in a different document, there are two that I believe are of the greatest interest to the Alaska State Legislature.

- Because of the lack of current economic analysis (CSP is based on 1998 economic data) the devastating impact of the CSP to the sectors or coastal communities has not been properly understood. The loss of jobs and charter fishing related revenue should be projected prior to the implementation of this rule.
- CSP circumvents the public process by placing the authority of setting annual management measures (bag and size limits) with the [International Pacific Halibut Commission \(IPHC\)](#) rather than with the [North Pacific Fishery Management Council](#). The IPHC is not subject to the [Administrative Procedures Act \(APA\)](#) which mandates public involvement in the rule-making process. In essence, this change removes United States citizens from management decisions over domestic allocation. Convenience and expediency should never justify preventing public involvement in significant policy decisions.

I will expound on these points and reference others during my testimony before the committee during its hearing on September 1<sup>st</sup>.

The committee can review the SEAGO "Call To Action" at:

<http://www.seagoalaska.org/documents/cspaction.pdf>

Thank you.

Southeast Alaska Guides Organization  
<http://www.seagoalaska.org> · [Heath@seagoalaska.org](mailto:Heath@seagoalaska.org)  
907.244.4909