

April 12th, 2026

To: Juneau City Clerk's Office, Visitor Industry Task Force (VITF)
155 S. Heritage Way
Juneau, Alaska 99801

Dear VITF Members,

Thank you for any consideration made to my public comment and suggestions. It is an honor to participate in Juneau's future, with regard for cohesion amongst tourism businesses and agencies. I truly consider tourism to be the crown jewel of industry, with relatively benign externalities to our environment and community health! The following recommendations are designed to address data gaps in maritime tourism activities such as whale watching, charter fishing, sightseeing, and passenger ferry transport.

As a licensed and experienced maritime educator, I feel qualified to testify that we do not yet have adequate data to make informed decisions regarding maritime tourism in our commercial use areas. Regardless of each member's interpretation of the issues discussed within this Task Force, the data pool is limited to social media posts and individual observations. This is not a healthy footing to achieve sustainable solutions that appease commercial operators, nor the community at large.

My organization, Southeast Alaska Boater Education and Research (SABER) is fundamentally designed to supplement Alaska's absence of boater licensing requirements, specifically in relation to how commercial vessels operate alongside recreational boaters. In addition to my formal credentials, I have operated as a whale watch captain in Auke Bay every year, since 2012. I have theories to suggest (as each of you do), but why theorize when we can take a step back and allow the data to speak for itself?

The good news is that the marine use data we need is simple and inexpensive to gather; it simply has not been gathered. I have worked tirelessly with Alaska's Office of Boating Safety, US Coast Guard and USCG Auxiliary, University of Alaska faculty, and industry leaders to ensure that the prospective research project will result in beneficial outcomes. More importantly, a structured research project will alleviate perspective bias from the partisanship between community members, recreational boaters, and whale watching operators.

The following pages are supplemental to my official public comment, revisiting my FY25 Marine Passenger Fee Proposal. The proposal was rejected due to Zones and Usage stipulations within the CLIA vs CBJ Settlement Agreement, but perhaps CBJ would be willing to implement the initiative through general funds. Cost estimates for the suggested projects should adequately represent my organization's commitment to a healthier industry and happier community.

Thank you for your time and please feel welcome to contact me if you have any questions. Enjoy a well-earned summer and go see some whales!



Luke Holton
Director, SEA-Guides Juneau

Subject: Support in Tourism Research, Education, and Administration Development

Organization: Southeast Alaska Boater Education and Research

Summary

Southeast Alaska Boater Education and Research (SABER) is requesting support and funding from the City and Borough of Juneau (CBJ) to conduct longitudinal research and education of Juneau's commercially utilized waterways, to include (a):

1. Qualitative study of Juneau's recreational and commercial vessel compliance
2. Establishment of the Juneau Mariner's Education Program
3. Data collection opportunities for tourism management entities and researchers

The data collected by participants will be statistically applied to prove or disprove necessary increases in the staffing of associated tourism entities, namely the National Oceanic and Atmospheric Administration, Office of Law Enforcement (NOAA-OLE); City and Borough of Juneau (CBJ), Tourism Manager's Office; United States Coast Guard (USCG); Tourism Best Management Practices (TBMP); and the implementation of a Juneau-based Boater Education Program, mirroring *Sound Watch*. *Sound Watch* is an established community education program which successfully addressed maritime industry disputes in Washington State's Puget Sound. You can learn more about this program at: <https://whalemuseum.org/pages/soundwatch-boater-education-program>

To best implement this regiment of data collection and community outreach, SABER is requesting \$149,888.14 from CBJ to meet the budgets itemized in each section. This amount will be dispersed across two associated projects, referenced in this proposal as *Regional Mariner's Compliance Study*, and *Juneau Mariner's Education Program*.

These two initiatives will directly address industry-related complaints that are centered around the growing density of tourism operators. Juneau residents can be assured that the mission of SEA-Guides is to illuminate methods of safe tourism which are sustainable for the community and ecosystems. This program will effectively act in a liaison capacity to bridge communication between commercial tourism vessels and recreational vessels. In addition, this style of boater education will ensure local boat operators decrease risk to themselves and others while operating within the commercial zones listed in this proposal.

Regional Mariner's Compliance Study

Background: Historically, criticisms of maritime tour vessels have been misinterpreted by regulators and community members, mainly due to the perspectivism conflicts between associated industries and recreational boaters. With scarce oversight of Juneau’s commercial boating areas, lawmakers lack a true representation of both commercial and recreational vessel adherence to Marine Mammal Protection Act (MMPA) Law and USCG Codes of Federal Regulation (CFR), which govern vessel behavior. Authorities tasked with overwatching these areas claim “understaffing and underfunding” as operational obstacles to enforcement.

Goals of Project: Provide the NOAA-OLE and USCG with quantitative data to either prove or disprove the need for increased presence of these enforcement entities. The data collected will be forwarded to U.S. Office of Personnel Management in conjunction with a formal request for restaffing of NOAA-OLE, Juneau Field Office, and USCG assets. Data will also guide municipal offices in creating effective commercial viewing guidelines through Tourism Best Management Practices and NOAA’s Whale SENSE Program.

Additionally, detailed logs of boat traffic and concentrations will directly contribute to the data collected by Juneau Whale HEALTH (Humpbacks, Ecosystem Monitoring, And Long-Term Histories) Program, an FY24 MPF funded project.

Methods: Surveyors will be present in the below-listed areas from 8:00 AM- 8:00 PM Sundays, Tuesdays, Wednesdays, and Saturdays (May 1st through September 30th). During these times, observational data will be collected to properly illustrate collective vessel concentrations, patterns, ship to ship communications, viewing distances from wildlife, and vessel behavior within Steven’s Passage, Favorite Channel, Saginaw Channel, Lynn Canal, and Auke Bay.

Formal qualitative methodology will be constructed by research faculty at University of Alaska (UA) and UA Independent Study students, offering local educators access to pragmatic and experiential research projects.

Cost: \$66,128.14

Item	Cost
Staff Wages (48-hours per week @ \$18.00/hr) (2)	\$34,560.00
SABER Vessel Operational Cost (12-hours per day @ \$23.32/ hr)	\$22,387.20
Methodology Design and Consultation	\$2,740.00
Survey Equipment (range finders, GIS software, and laptop)	\$6,440.94
	\$66,128.14

Background: The 2023 McKinley Research Juneau Tourism Survey indicates a steady increase in negative interactions between recreational and commercial tourism vessels. With unprecedented growth of Juneau’s passenger vessel fleet, the risks of catastrophic incidents grow every year. In 2023, SABER noted that Juneau mariners are largely unaware of the USCG’s Combined Federal Regulations which govern safe boating, leading to dangerous interactions with commercial vessels. In addition, post-pandemic economic drivers have lowered the availability of licensed commercial crew members globally, resulting in employment of less experienced merchant mariners within Juneau’s waterways.

Program Goals: It is this program’s mission to bridge the gap between commercial and recreational vessel operators. Serving as a bipartisan voice, JMEP can ensure that hazardous behavior from commercial operators will be addressed by contacting the vessel’s captain, and/ or supervisor, and/or TBMP. Likewise, recreational boaters with no formal training will have access to educational resources to instill safe boating practices. No formal reports or citations are involved in this process apart from documenting the contact between SEA-Guide volunteers and the vessel operator. Annual reports with analysis, statistics, and project performance will be submitted to applicable offices. Examples of these reports can be found through the *Sound Watch* website link, listed on Page 2.

Methods: Maintain presence within Juneau’s waterways and harbors to provide free reference materials and guidance to boat operators. Program staff (prospectively alongside Juneau’s USCG Auxiliary volunteers) will conduct community outreach at Juneau’s recreational harbors to offer boat operators an assortment of USCG reference materials, trends in wildlife locations and concentration, area avoidance maps, viewing guidelines for protected animals, etc.

In partnership with the Alaska Marine Education Association (AMSEA), JMEP will also provide commercial boating safety training to charter vessel operators and business owners.

Cost: \$83,760.00

Item	Cost
JMEP Staff Wages (48-hours per week @ \$18.00/hr) x2	\$34,560.00
JMEP Outreach Vessel (type contingent upon market availability)	\$25,000.00
JMEP Vessel Operational Cost (12-hours per day @ \$17.50/hr)	\$16,800.00
Educational Materials (pamphlets, printouts, etc.)	\$7400.00
	\$83,760.00