



September 16, 2026

TO: Visitor Industry Task Force City and Borough of Juneau

Dear Members of the Visitor Industry Task Force,

The Southeast Alaska Whale Watch Association (SEAWWA) is writing to update the Task Force on our progress addressing on-the-water issues that affect the Juneau community, and to share our members' position on the vessel-management options currently under consideration.

Who we are

SEAWWA was founded in 2024 to give Juneau's whale watching operators a single forum for identifying problems and agreeing on solutions. Modeled to work in tandem with the Tourism Best Management Practices (TBMP) program, SEAWWA is a volunteer working group of whale watching operators committed to collectively reduce negative impacts, promote community stewardship and thereby secure the long-term sustainability of the industry in which we operate.

Our member companies represent an estimated 95% of the whale watching fleet operating in Juneau. Since our founding, the Association has repeatedly shown that operators can act quickly and collectively when an issue arises, and we have worked closely with TBMP to turn those agreements into formal recommendations and requirements. This accountability among member companies is taken seriously. It is positive peer pressure at its best.

What SEAWWA has accomplished

As vessel traffic in the Juneau area has grown, our members have adopted a series of best practices aimed at reducing impacts on residents, other boaters, and wildlife:

- **Rerouting away from congested areas.** After incidents in which wakes affected small local vessels in Coghlan Cut, SEAWWA members responded. As of September 2026, members agreed to avoid the Cut entirely or treat it as a no-wake zone.
- **Greater accountability and visibility.** Majority of Coast Guard inspected vessels have installed AIS transponders and/or onboard cameras.
- **Reduced pressure on whales.** In the 500 yard distance Members have agreed to a 30-minute time limit spent with individual whales and to reduce the number of vessels present at any one time to limit the number of vessels around whales to 12.

- **Less noise.** When it is safe to do so, vessels shut down their engines while viewing whales.
- **Improved communication on the water.** Created open lines of communication and accountability on the water among the entire fleet.
- **Expanded membership and outreach.** SEAWWA will establish a more formal sign-up process and conduct direct outreach to whale watching companies. Member companies will sign a formal dedication letter committing to TBMP guidelines and recommendations.
- **Self-imposed no-wake zones.** Members are currently testing voluntary no-wake zones on the approach to Auke Bay Harbor in response to local concerns.

SEAWWA will continue to respond to community concerns as they arise. We believe these results show that the industry is willing and able to regulate its own conduct.

What SEAWWA cannot do

There are two limits to what voluntary action can achieve. First, the Association cannot control the total number of vessels operating in Juneau. Second, a significant number of commercial vessels operating out of Statter Harbor are not whale watching vessels and are not SEAWWA members. Those vessels also affect the community, but they are outside the scope of any agreement we can reach. We raise this not to deflect responsibility, but so the Task Force has an accurate picture of which impacts SEAWWA can address and which it cannot.

Our position on capping the fleet

SEAWWA fully supports a cap on the number of vessels permitted to operate in Juneau. Our members agree this is the single most important issue to resolve, and many have already agreed to a self-imposed moratorium on constructing additional vessels. A voluntary moratorium, however, only works if there is a mechanism to prevent new entrants from adding vessels to the area. That mechanism must come from the City.

Protecting existing investment

While our members support a cap, they have made substantial investments that any permit system must take into account. Purpose-built wildlife viewing vessels can cost millions of dollars each. They are designed specifically for Southeast Alaska waters, with features such as aluminum hull construction, specialized seating configurations and layouts, marine heads, passenger capacities, and engine configurations chosen for this use. Much as a fiberglass sailing catamaran built for Hawaiian snorkel tours has little value elsewhere, these vessels have limited resale value outside this market. Most were financed through bank loans at high interest rates by individuals and families, some of whom have operated in this industry for twenty to thirty years and refinanced during COVID shutdowns.

Recommendation: transferable, company-owned permits

For these reasons, SEAWWA members are firmly opposed to any permit structure in which permits are "rented," leased, or otherwise held by the City rather than owned by the operator. Under such a structure, an operator's vessels, brand, marketing, and business would become effectively worthless overnight, and long-standing operators could be forced to liquidate specialized assets into a market with no use for them. Our members question both the fairness and the legality of that outcome, and any non-transferable permit system will be vehemently opposed by the industry.

We recommend instead a model similar to the one used in Alaska's commercial fisheries: permits that are owned by the business and can be transferred with the sale of a vessel or company. Specifically, we propose that each company currently operating be granted permits equal to its existing number of vessels, with each permit owned by the company. This would cap the fleet at its current size, prevent new entrants from adding vessels, and preserve the value of the investments existing operators have made.

We appreciate the Task Force's work on this issue. Should the City and Borough of Juneau move forward with any form of limited entry for whale watching, SEAWWA requests a direct role in shaping that program. A permit system designed without operator input risks overlooking the practical details that determine whether it succeeds: how vessels are counted and classified, how transfers are handled, how compliance is verified, and how the program interacts with the best practices already in place. Our members bring decades of firsthand experience with these realities, and their involvement is necessary to ensure the program is workable, enforceable, and fair to the operators it affects.

Respectfully,

The members of the Southeast Alaska Whale Watch Association