

Dear Legislators,

As a minority member in the guide industry in Alaska, I am voicing my opposition to the SB 160 DNR Hunting Concessions bill. I am a non-resident registered guide, thus a minority, and have made my living as an entrepreneur in a free market system, and along with a large number of other registered guides I am staring down the barrel of a legislative effort that will certainly encroach upon my ability to make a living, and conduct a legitimate business in the great State of Alaska.

I am honored to have been able to forge a living within such a wonderful industry, and after more than a dozen years as a non-resident business owner, I am very much aware of this concentrated effort by some elitist groups to infringe upon the free market within a heavily regulated industry, and those who would impose their wills upon you, and us, through you, seek to do so in order to foster a monopoly that can only hurt the entire industry in the long term.

This letter is in opposition to **Senate Bill 160**. Please include this as part of my public testimony. The GCP is a very complicated issue with many different tiers.

Reasons opposing implementation of the GCP/SB 160-

- Allocation of the guide industry, will create a monopoly/against free market values
- GCP was proposed to address *social issues*, including user conflict, on state lands associated with commercial hunting activity. This is not a conservation issue (which would clearly be the responsibility of the Department of Fish and Game)
- *“has not been well received by the industry and the public...”* Cliff Judkins as Chair of Board of Game (BOG)
- The need for the GCP is not fact based; it's based on **arbitrariness, personal preferences, blankets allegations, and antidotal information**.
- Up to 66% of guides/small business owners could be forced out of business making their current and past investments and hard work null and void. No such monopoly exist within other industries in the State of Alaska.
- It is a State wide blanket program when the perceived issues it will supposedly fix are in very few areas of the State.
- *“DRN may not be able to effectively address all of the issues noted...”* GCP Doc. ADL 230869
- A small segment of the guide industry, the Alaska Professional Hunters Association (APHA) has lobbied hard for the GCP. Not only have they lobbied the Legislature but also the BOG and the Big Game Commercial Services Board (BGCSB). Both of which will testify to SB 160 probably in support of it. It is important to remember that the APHA is a very small, but loud and connected segment of the guide industry with only roughly 125-140 members. That means **10%** of licensed guides.

- What this GCP/SB 160 all boils down to is to cut down competition between guides/businesses and it **will** do that. The haves vs. the have nots, big vs. small. I guess you have to ask yourself if competition and free market is a good thing or not.

Reasons/Concerns with the specific points of the GCP-

- Set a maximum number of clients per calendar year, per concession area for Full Concession Areas. In order to reduce the perceived user conflicts resulting from too many guided nonresidents on state lands the state should cap the number of nonresident *clients*. The GCP has no stipulation of this for the Full Concession Areas. This just goes to show again that the GCP is an anti- guide compete program and nothing more. If it doesn't reduce the guided hunters coming into the State how is it reducing conflict with other user groups, i.e. resident hunters?
- Establish a fee/tax/royalty for the exclusive use of state resources to be deposited into the Fish & Game Fund, AS 16.05.100. The state of Alaska extracts monetary payment for the exclusive use of oil, gas, minerals, timber, fish and land. Exclusive hunting concession areas should be no different. To be clear, I acknowledge the proposed \$2000 and \$1000 concession fees for full and limited concessions, and per client fee of \$500/\$250 respectively. This is to cover the cost of administering the GCP and wholly separate from paying the state for exclusive use of a resource. As proposed by DNR no money will go to the general fund or even to a Fish and Game fund for harvesting an exclusive resources that we all as shareholders of the State own. This is why Exclusive Guide Areas (EGAs) were found unconstitutional in the *Owsichuk* decision. *Owsichuk* also stated assignments of EGAs were not based on wildlife management concerns and that is still the case today with the GCP.
- The GCP does not address transporters and air taxis. The point of the GCP is to relieve conflict. Any plan that does not account for, and address, the unregulated number of non-res and resident hunters that could be added to an area by transporters would be unreliable, and doomed to failure. That said, limiting access for Alaskan residents utilizing transporters is well outside of DNR's authority and mission.
- The 4 issues that DNR notes are problems- 1. *Lack of wildlife conservation* 2. *Loss of quality of experience*. 3. *Conflicts between user groups*. 4. *Lack of land stewardship*. Can all be addressed with the current boards and agencies in place thru current or modified alternatives.

Once again I urge you to recognize this bill for what it is, and understand that it is indeed an attempt to monopolize a public resource, and it will force small business owners out of a market that should indeed be free.

Sincerely,
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