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SENATOR JAMES KAUFMAN

Sponsor Statement for SB 253 version B

"An Act relating to a big game guide commercial concession permit program on land in the state; establishing a big game guide commercial concession area pilot project; and providing for an effective date."

Senate Bill 253 seeks to solve a long-standing problem on state lands by implementing a constitutionally sound concession program to limit the number of commercial hunting guide operations on state lands in Alaska. While federally managed lands in Alaska have successful hunting guide concession programs, there is no process by which the commercial use of state land is allocated. With no limits on the number of commercial hunting operations, the status quo continues to drive overcrowding and localized wildlife resource overutilization. This program is narrow in scope to hunting guides and does not limit Alaskan resident hunters or any other subset of the hunting community.

For years, in problem areas around the state, chronic overcrowding and overutilization have resulted in decreasing incentives for guides to act as stewards of our public trust resources. The current unregulated situation incentivizes guides to aggressively "race for the game" thereby decreasing quality of experience for guided clients, increasing conflicts between commercial users, and disadvantaging the general public (resident hunters, subsistence users, private property owners) who would not be limited by this bill. The status-quo also increases difficulties and costs for the enforcement of wildlife laws.

From January to October 2023, the Guide Concession Program Workgroup (formed by the Big Game Commercial Services Board) conducted a comprehensive process that included public meetings, a thorough review of numerous past proposals, consideration of the successful elements of the federal concession programs, and robust public consultation with licensed guides, residents, other stakeholders, and various state agencies. Public input played a crucial role in shaping the recommendations throughout the Workgroup's process. The concession program proposed by SB 253 is modeled after the Workgroup's conclusions and recommendations.

Specifically, SB 253 establishes a big game guide concession program on state lands, aiming to add tools to improve wildlife conservation, reduce conflicts and encourage a professional guide industry. The key features of the program include a competitive process that ensures qualified individuals and new entrants to the market are selected; 10-year concession duration that requires all applicants (including incumbents) to compete for each concession area on an even playing field every cycle; carefully crafted transferability conditions; heightened ability for state enforcement of wildlife laws; and an equitable fee structure that will allow the state to adequately maintain the program.

This legislation represents a balanced, well-considered approach to address the challenges in commercial big game hunting on state lands. The passage of this bill will put in place a proven mechanism to improve the quality of hunting on state lands to the benefit of all Alaskans.

2023 Big Game Commercial Services Board
Guide Concession Program Workgroup
Summary of Proposal—Version 2.1—DRAFT

HISTORY AND PROCESS

During the December 2022 annual Big Game Commercial Services (BGCSB) board meeting, the board approved formation of a workgroup to examine complaints received by the public and licensees of poor wildlife conservation practices, overcrowding, and overutilization of hunting in some areas of the state. The board chair was appointed to the workgroup and asked to solicit the following representation. The workgroup consists of:

Department of Natural Resources (DNR) Representative:
Christianna Colles, Director; Division of Mining, Land, and Water

Department of Fish and Game (DFG) Representative:
Rick Green, Special Assistant to the Commissioner

Public Citizen:
Ted Spraker

Interior Guide/Outfitter on State Land:
Coke Wallace, Master Guide-Outfitter

Coastal Guide/Outfitter on State Land/BGCSB Representative:
Jason Bunch, Chair, BGCSB; Registered Guide-Outfitter

The BGCSB chair, Jason Bunch, a guide with over 15 years of experience on both federal and state land was chosen to lead the workgroup, which was staffed by the Department of Commerce, Community, and Economic Development (DCCED). State agencies engaging with the workgroup included DNR, DFG, DCCED, and Alaska Wildlife Troopers (AWT).

The workgroup held a series of public meetings January - October 2023, focusing on the concept of creating a guide concession program on state lands. Two in-person public meetings were held to hear from the general public—one in Fairbanks and one in Anchorage. Six Zoom meetings were held specifically to receive comments from the public on individual topics. The workgroup received written comments throughout the ten-month process. This document sets forth the workgroup's recommendation that a general statutory framework be established that provides agency authority to adopt regulations; the workgroup's regulatory vision and intentions are summarized herein but are nonbinding to any agency participants. Establishing standards and details in regulations will provide additional opportunities for public input and allow the program to remain agile as situations change.

The process utilized a review of the 2013 Proposed Guide Concession Program (GCP) Framework Document (ADL 230869) as a starting point. This framework was the core product of DNR's proposed concession program on state land, which included research and legislation

from 2008-2013. Although this substantial effort was never realized, it scrutinized similar issues the workgroup was tasked with evaluating, including:

Agency Responsibilities	Statutory Authorities and Requirements
Applications	Scoring and Ties
Awards	Terms
Fees	Transferability
Implementation	Transporters
Mapping	Types of Concessions
	Vacancies

Generally, public testimony illustrated the complexity of Alaskan lands and wildlife resources, the various agencies who manage them, and the user groups themselves. Public comments tended to fall in one of the following categories:

- Licensed guides in favor of a concession program who have experience in areas that receive a high volume of use or where winter and predator mortality is high.
- Licensed guides not in favor of a concession program with experience in areas that are not congested with user groups and/or are in areas still abundant with game.
- Newly licensed guides in opposition because they fear lost opportunity.
- Licensed guides who are skeptical of the state's ability to successfully manage a concession program.
- Resident sport hunters who generally favor concessions when a comparison is drawn between federal and state land experiences.

PROBLEM STATEMENT

Currently, there is no process by which the commercial use of state land is allocated among commercial big game hunting guides, and there is no limit on the number of DNR Division of Mining, Land and Water authorizations a guide can have on state land or how many, regardless of size, commercial hunting operations will be allowed to operate in one area. This method of management has frustrated wildlife conservation. As a result, DFG and Board of Game are unable to develop allocation schemes that bring the highest benefit to the public. In "problem areas" the status quo continues to contribute to overcrowding and resource overutilization. Several related issues have been identified by members of the guide industry, the BGCSB, and the Board of Game (BOG). Chronic issues include a decreased incentive to practice sound wildlife management, decreased quality of experience for guided clients, conflicts between commercial users and general public (resident hunters, subsistence users, private property owners), lack of land stewardship, and difficulties in enforcing game laws.

Recently, certain areas of the state have reported decreased numbers in sheep, brown bear, caribou, and moose. These reports have led to at least one decision by the BOG to restrict and close guided non-resident hunting opportunity. The cause of these decreased wildlife populations are complex but generally result from a combination of high winter mortality,

predation, and increasing habitat degradation from climate change. Hunting opportunity must be viably reduced when population's decline to ensure sustainability.

A review of these issues and a recommendation on how to proceed with permitting of guided hunting is necessary to assist the BOG, DFG, and DNR with wildlife conservation/utilization and land stewardship. This recommendation has the goal of supporting sustainable small business opportunity for big game commercial services, increase quality hunting experience for both residents and non-residents and assist AWT in enforcing game laws.

OVERVIEW OF CONCESSION IMPLEMENTATION PROCESS

STEP ONE: A BOG proposal is generated by any interested person to implement a concession within specified area. BOG alerts related agencies to prepare to comment on the proposal at that meeting.

STEP TWO: BOG reviews proposal with ADFG, BGCSB, DNR, and public. If supported, a recommendation is sent to Lead Agency for implementation within a specified area. Allocation may be established.

STEP THREE: Concession Advisory committee reviews recommendation and establishes criteria, such as number of unlimited guide outfitters, limited guide outfitters, GUA or concession boundaries, potential number of clients for species, etc.

STEP FOUR: Lead Agency offers concession applications and completes random draw for limited authorizations.

IMPLEMENTATION

The workgroup generally accepted the 2013 Framework proposed by Lead Agency. This document will explain any departures from that proposal.

A concession program for big game commercial services will require partnerships among several state agencies, each with specific responsibilities within the program to address elements of wildlife conservation, land management, and regulation of professional guiding services.

Authorization of a Concession Program

A concession program will serve as a tool for the Board of Game, whose primary responsibility is to conserve and develop Alaska's wildlife resources, making allocation decisions related to wildlife.

Proposals to enact state land concessions within a GMU will be brought before the BOG during their regionally scheduled meetings when criteria such as wildlife conservation, social conflicts creating reduced opportunity, or negative impacts to game law enforcement are suspected. The proposed area will be within the region scheduled and be a portion of Game Management Unit (GMU), a Game Management Sub-Unit or Guide Use Area (GUA). The BOG will consult with

relevant state agencies and the public to ascertain the viability of a concession implementation proposal. During these meetings:

- BGCSB administrator will provide licensing, guide and transporter use data, mapping information and the board's recommendation to support, oppose or be neutral.
- Lead Agency permitting officer will provide land use data.
- DFG staff will be prepared to provide wildlife information, resident, non-resident, guided, unguided and transporter use information.
- BOG will take public testimony on the proposal.

Once an area is considered appropriate for concession through the BOG public process, the BOG will recommend Lead Agency implement the concession program in the proposed or affected area.

Management of the Concession Program

The workgroup did not make a recommendation of which agency should be granted authority to implement the concession program. As the state's land manager, DNR has the expertise to provide land use authority for a concession in the form of a lease specific to big game commercial services providers. The workgroup's vision is that concessions will not simply be permits and will convey some level of interest in the land, so the workgroup discussed whether DNR would be the most appropriate Lead Agency. As the entity with oversight of the activities of guide-outfitters, the workgroup explored whether the Big Game Commercial Services Board would be appropriate. However, there were concerns about the lack of land management expertise within DCCED and the inherent potential ethical conflicts with a board of market participants issuing permissions that would exclude others from participating while potentially enriching its membership. The workgroup did not discuss whether DFG should be considered as the Lead Agency.

Once the Lead Agency is established, an advisory board will be created in statute to assist Lead Agency with identifying and evaluating criteria specific to the area and to ensure all effected state agencies and user groups have representation. The advisory board will be appointed and managed by Lead Agency and will change as the concession areas are created or decommissioned. Examples of members may include the appropriate area biologist from ADFG, permitting officer from DNR, and representatives from BOG and BGCSB and/or big game guide-outfitter licensees who are not participating in the concession program. The responsibility of the advisory committee is to provide recommendations for establishing program criteria such as joint use versus sole use, numbers of species available, mapping and boundary adjustments, etc.

Lead Agency will need statutory authority, funding, and resources to create an Office of Guide Concessions. Initially, this may be an ad-hoc Lead Agency staff group until total workload to administer the program is better understood. BOG, DFG, BGCSB, and DNR also may need additional statutory authority to carry out their partnership roles as outlined below. Additionally, AWT, BGCSB, and the Lead Agency will likely need additional authority to enforce their roles within the new concession program. The workgroup highly recommends the minimum necessary

authority be granted in statute, with the program details established in regulations. This will allow Lead Agency to maintain a flexible public process that can change transparently with the needs of the BOG and the industry.

PROGRAM DESIGN

Competitive Offerings will be publicly noticed as a “full concession” solicitation for applications by Lead Agency after recommended by BOG and details of the concession have been suggested by the advisory committee. The application will be a scorable questionnaire to find the most capable candidate for the offering, incorporating as little subjectivity as possible. The more subjective the application, the more difficult to articulate a clear “best candidate.” The application will be simple and streamlined, including parameters for each answer that requires a narrative. The highest scoring application(s) will be awarded. A “limited concession” will be available via random draw as noted below.

The number of applications a guide can submit for a competitive full concession will not be limited. Concession implementation will be kept to smaller areas of the state such as GMU sub units or small clusters of GUAs that meet criteria outlined for concession implementation. To begin, Lead Agency will use caution, only instituting one area at a time to prevent an application backlog and also allow for critical components of the program to be adjusted before moving forward with the next. This “small bite” approach will be responsive to wildlife dynamics and keep the administrative burden and cost at a minimum, while allowing application opportunities for every qualified guide.

The number of full concessions a guide can be awarded will be limited to three Guide Use Areas with only one state land concession within any one Guide Use Area. This approach ensures opportunity for new entry and removes the potential for monopoly of use within any single GUA.

Mapping was completed successfully in the 2013 GCP Framework Document. These maps and boundaries will be utilized by the advisory committee as a starting point. The division of some larger GUAs into multiple concession areas continues to be warranted. Of note, the BGCSB is responsible to establish guide use area boundary changes through regulation.

Types of fees will be established in regulation and adjusted as needed to cover program costs. The workgroup envisions that Lead Agency will need a modest amount of start-up funding and receipt authority to cover ongoing program expenses. Per-client fees will be determined through relevant hunt record data provided by DCCED, sharing of which will need to be authorized in statute. The fee structure per client is generally accepted and provides for equity among the various sizes of businesses.

The workgroup discussed the following guidelines for fees, with final determination through the regulations process:

- Annual per-client fee:
 - These fees will only apply to clients that are guided or outfitted. If there is legal space to avoid charging a fee for Alaska resident clients, it will be considered.
 - After receiving recommendations from the advisory board and the public, fees will be structured using one of the following methods:
 - Flat annual fee per concession:
This fee may need to be several thousand dollars; however, the simplicity of recordkeeping may benefit both guides and departments.
 - Linked to the type of animal pursued:
Example: The fee is \$500 per client for those species that require a guide for non-resident hunters (brown bear, Dall sheep, mountain goat) and \$250 per client for all other species.
- Existing required DNR permit structures remain in place, so those fees will be assessed.

Types and duration of concessions are recommended in accordance with the 2013 GCP Framework Document, with changes illustrated below:

The full concession is the primary type of concession that will be offered:

- Full Concessions will be offered through the competitive process.
- Up to two full concessions per area to be allowed by the advisory board.
- These permits will not limit the number of assistant guides, however, they will be limited to the number of clients and species annotated on their permit consistent with the operations plan that must be submitted with the application.
- DFG and/or BOG will be consulted and provide recommendations during the scoring process concerning number of each species identified and/or establish an allocation for each species where conservation concerns exist during the proposal process.
- DFG will have the opportunity to adjust the allotment of each species during the award process and annually as required to ensure successful wildlife conservation is being achieved.

The limited concession is the second type of concession that will be offered, providing opportunities for smaller business and new entry. This type of concession will not be attractive to more established guides with larger businesses, who will compete for full concessions.

- Limited Concessions will be awarded through a random draw application.
- The general terms and the duration of the concession permits are the same as those listed above for full concession permits.
- Limited concession permittees will only be allowed a smaller number of clients and/or species than a full concession.

- All limits will be recommended by the advisory board, which will have the opportunity to adjust the allotment of each species during the award process and annually as required to ensure successful wildlife conservation is being achieved.

Duration of concession will be for 10 years.

- The workgroup does not see the need to revisit concession permits at the 5-year mark established in the 2013 GCP Framework Document proposal.
- Permit stipulations will be established such that unlawful or undesirable activity can result in loss of the permit at any time.
- Removing the 5-year evaluation provides for a more streamlined effort while providing for maximum flexibility for management.

Vacancies will be filled using a process defined in regulations that accommodates various circumstances.

Transferability of a concession lease within the allowable parameters of the Alaska Constitution is crucial to the success of a concession program.

- This program will allow transfer of the remaining balance of a concession permit to a qualified guide with an approved operating plan.
- The main benefit of transferability to Alaska is to encourage guide business owners to operate high quality, modern businesses that are competitive with other landowner guide operations. In turn, these investments ensure a focus on wildlife conservation practices with a long-term goal of sustainability, allowing a guide to sell his or her business assets and transfer the remaining term of the land use concession.
- Secondly, it allows for new entry into the concession program by providing a means for guides to take over a business they may have mentored under for years or to step into the role of business owner for the first time.
- Elements for Lead Agency and the advisory board to consider when creating regulations for the program, including but not limited to:
 - Provisions for emergency transfers if a guide is hurt, sick, or incapacitated
 - How requests for transfers are made and approved
 - Authorization for natural persons instead of corporations
 - The criminal history of the transferee, especially relating to fish and wildlife violations
 - Limits of awards after transfer of a concession to another guide
 - Demonstration of the ability to meet standards and operations outlined in the competitive application upon which the existing permit was based
 - Repercussions for failure to comply with concession terms and conditions
 - Transfer of permit privileges issued under this paragraph in the case of death or disability of the permittee, especially to a spouse or heir

Transporters will not be included in the hunting guide concession program. Transporters provide valuable services to resident sport hunting enthusiasts. Limiting resident hunting

opportunity is not in the purview of this workgroup nor its agenda. Furthermore, it is generally believed that with a reduction in the number of guides providing services in an area, air transportation services could begin to decrease naturally. The workgroup recommends DNR, BGCSB, and DFG continue to collect data regarding transporter services. When a concession area is instituted, this data will be critical in deciding what tools if any will be required for further wildlife management and land stewardship.

Enforcement will be responsibility of all agencies involved within their statutory authority. The Alaska Wildlife Troopers (AWT) are in the field during hunting seasons conducting in-person contacts. They understand the issues brought to the workgroup and believe concessions will be a tool that will benefit their ability to enforce wildlife regulations. AWT initial recommendations are that Lead Agency will be granted authority to enforce violations and conditions of a concession permit which will empower AWT to ticket violators for same. Lead Agency, AWT, and BGCSB will likely need additional statutory authority for enforcing concessions and continue to work closely together to ensure the concession operations are being conducted in Alaska's best interests.

Increased compliance communication between Lead Agency and the BGCSB is recommended. Any guide/outfitter who provides services without land use authority is in violation of AS 08.54.720(4). A land use permit specific to guide-outfitter operations may benefit this process, especially in areas where a concession program has not been implemented.

The next step is for the Administration to discuss which agency might be best suited to lead this effort and determine appropriate next steps in the legislative process.

The Guide Concession Program Workgroup wishes to thank the guide-outfitters, resident hunters, agency staff, and members of the public who participated in this effort. Materials related to the workgroup are published [on the BGCSB website](#).



**SCI Alaska Chapter
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March 4, 2024

Alaska Legislature
State Capitol
Juneau, AK 99811-0001

Re: SCI-AK Support for Senate Bill 253 DNR BIG GAME HUNTING PRGRM/PILOT PROJECT

Honorable members of the Senate Resources Committee,

The Safari Club International Alaska Chapter supports Senate Bill 253 DNR BIG GAME HUNTING PRGRM/PILOT PROJECT

Founded in 1971, Safari Club International is the country's leading hunter rights advocate and additionally promotes worldwide wildlife conservation. SCI's approximately 50,000 members and 200 Chapters represent all 50 of the United States as well as 106 other countries. The Safari Club International Alaska Chapter (SCI-AK) is a 501c4 conservation non-profit Corporation established in Alaska in 1977. We currently have over 1,200 members and are the largest chapter in SCI history. Our mission statement is "First for Hunters - First for Wildlife."

SB 253 is the result of an arduous, transparent working group process that developed a recommendation to implement a hunting guide concession program on state DNR lands. The resulting bill focuses on conservation and providing a degree of protection to our precious wildlife resource. Hunters are, first and foremost, conservationists. They abide by the North American Model of Wildlife Conservation, the world's most successful system of policies and laws to restore and safeguard fish and wildlife and their habitats through sound science and active management. Professional guides in Alaska are among the best in the world. They know the resource better than many and are always cognizant of minor changes that may affect the overall health of any given population of animals. Absent limits on commercial operations, overhunting can occur and threaten a harvestable surplus relied on by subsistence users, residents and guides alike. The board of game currently has inadequate tools to reduce pressure and maintain guide business viability. We see SB 253 as an effort to conserve and maintain the economic health of Alaska's guided hunting industry by promoting resource stewardship on state land. Successful hunting guide concessions have been in place on federal lands for thirty years. SB 253 takes a measured approach by targeting a known problem area and establishing a big game guide commercial concession pilot project within Game Management Unit 19C. The bill has provisions to expand the program to additional problem areas if the pilot project is successful. SB 253 only limits guided hunting, resident hunters are not restricted and will benefit from a reduction in commercial hunting operations on state lands.

***Safari Club International Alaska Chapter
First for Hunters - First for Wildlife***

We recognize this legislation is a work in progress. We applaud Senator Kaufman for taking steps to ensure that guided Alaska hunts provide a quality experience for hunters, both resident and non-resident, while simultaneously protecting the wildlife resource. We urge the legislature to hear and consider this bill and look forward to fully supporting the final version.

Thank you for your consideration.

John Sturgeon

SCI Alaska Chapter President

E-mail: president@aksafariclub.org, Cell: (907) 230-0072

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ALASKA

PROFESSIONAL HUNTERS ASSOCIATION, INC.

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March 5, 2024

Senator James Kaufman
State Capitol Room 115
Juneau AK, 99801

RE: Letter of Support for SB253

Dear Senator Kaufman,

The Alaska Professional Hunters Association (APHA) is a statewide organization representing hunting guides in Alaska. Guiding hunters in Alaska is one of the oldest value-added tourism activity in the state. Nonresident hunters began traveling to Alaska in the 1920s. Alaska's hunting guide industry is made up of small, mostly family run, guide businesses who operate on public land. According to McDowell, 86% of Alaska's guide businesses are Alaska owned with a majority of those guide business owners living outside of Alaska's urban areas. The APHA and our members have a vested interest in promoting wildlife and resource stewardship. Unfortunately, Alaska's own DNR lands are currently a free-for-all where guides must race to out compete each other and resident hunters to provide a chance to harvest game for their clients.

Alaska's state lands currently allow for an unlimited number of commercial hunting guide operations in any one guide use area. Unlimited entry places a burden on the resource and puts resident hunters, especially rural hunters, at a disadvantage. Unlimited entry also undercuts small sustainable businesses because a newer operator or existing aggressive operator can set up on top of a sustainable business without regard to historic use - the winner of the race to the game takes all. Resident hunters currently do not have recourse if they have conflicts or are harassed by hunting guides on state land. DNR does not deny commercial hunting guide land use authorization, revoke land use authorization or suspend authorization for a guide, no matter how many complaints have been launched against an operator. DNR currently permits new guides on top of old guides without any process to determine sustainability, mitigate conflicts or ensure the new or old operator are complying with permit conditions. DNR's lands in Alaska are the Wild West where the most aggressive guide wins and land use is guaranteed no matter how many complaints are levied at a hunting guide business or how many violations or safety incidents occur.

Federal lands stand in stark contrast to state DNR lands. On federal lands guides apply on a ten year cycle and compete with each other for a guide concession. Guides are scored on their operation plan, history of compliance, safety record, safety plan, business plan,

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client recommendations and points are deducted for violations and conflicts. Every ten years the federal concessions go out for competition and every ten years responsible guides are re-awarded their areas and new guides prevail where the incumbents have not held true to their commitments. Federal hunting guide concessions have been successfully operating in Alaska since the mid-1990s.

Alaska's DNR lands were not always a mess and the federal land managers haven't always done a better job of regulating Alaska's hunting guides. Before 1988, Alaska had its own system of limiting guides by *exclusive guide areas* (EGAs) on both state and federal lands. The old system operated just like limited entry fishing permits but without the necessary constitutional amendment. As a result, EGAs were struck down by the state Supreme Court because EGAs were of unlimited duration, did not provide for new entry, were not resource based, did not provide for remuneration to the state and were being bought and sold like private property. In the landmark Alaska Supreme Court decision, *OWSICHEK v. STATE of Alaska*, EGAs were struck down but the court was clear "Nothing in this opinion is intended to suggest that leases and exclusive concessions on state lands are unconstitutional. The statutes and regulations of the Department of Natural Resources authorize leases and concession contracts of limited duration, subject to competitive bidding procedures and valuable consideration."

Wildlife is a valuable resource and whether public or private, it makes sense for responsible landowners to limit commercial hunting to only those that are good stewards of the land and wildlife resources. Otherwise, neighbors and guests that also share those resources could be negatively impacted. Because hunting guides spend large amounts of time in the field, they can provide added value and be an asset to landowners by reporting trespass and violations. Oftentimes they even help invest in infrastructure that can have uses beyond hunting. Having the right guide on your land allows you to get more value for wildlife in a low impact and sustainable way. Limiting commercial hunting operations by lease or concessions offers the landowner the ability to add value while ensuring covenants are kept or trespass is revoked.

The Alaska Board of Game is tasked with limiting harvest when a wildlife population becomes depleted or is in serious decline. The only tool the BOG has to limit guided non-resident hunting is draw permits. The number of NR permits is capped and winners are randomly drawn from a pool of NR applicants. Drawing hunts are a death knell for small guide businesses. Imagine putting your livelihood on random draw where you are incentivized to pre-sell the most opportunities you can to be competitive in a lottery? Guides are forced to discount their opportunities to secure high numbers of applications and they must wait until February of each year to know if they will have a business or not. Concessions allow the BOG to determine a number of hunt opportunities for a given

Dedicated to the conservation of our wildlife resources.

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species and then the guides in those areas have the ability to take a limited opportunity and add value to the resource. Limiting guides in an area allows the BOG to reduce nonresident opportunity in a unit while small guide businesses remain viable because they will have a predictable number of hunts.

The APHA is deeply thankful for SB 253 and hopes this bill will be heard and advance through the process. While the initial version of the bill will require some work to reflect the task force's recommendations, we are confident this can occur and we look forward to working with Senator Kaufmann and the senate resource committee. The APHA offers this letter of support in the spirit of collaboration with the legislature and other stakeholders as we all work to solve a long-standing problem on state DNR lands.

Without a regulatory framework to limit guides on state land we fear our historic Alaskan industry will not remain viable for much longer. Without guide areas, hunting guides will continue to race for the game at the expense of the general hunting public and we will lose our social license and the state will lose the benefit of this valuable rural economic driver. We humbly ask you to pass legislation that will regulate us in a way that promotes stewardship and sustainability for the good of the game, the public and guides.

Respectfully,

Sam Rohrer

Sam Rohrer,
President
Alaska Professional Hunters Association



Dear Senator Kauffman:

The Alaska Wild Sheep Foundation (AK WSF) supports the legislation creating hunting guide concession areas on State lands and we sincerely appreciate your effort to propose and pass this important legislation.

AK WSF is an Alaskan non-profit corporation with over 800 members in Alaska and throughout the US, Canada and Mexico. We are first and foremost a conservation organization dedicated to the conservation of Alaska's wild sheep in particular and wildlife in general. WSF is the largest single NGO contributor to ADF&Gs wildlife conservation mission with more than \$3M over the years. As a conservation focused organization, we are also allocation neutral in that we do not favor one hunting group over another. Our membership is comprised of resident, non-resident, non-resident aliens, and subsistence hunters, so we don't differentiate between hunting groups. Instead our goal is simply, "Keeping wild sheep on the mountains of Alaska!"

We see the proposed concession system as having many advantages over the current system where the number of guides in a guide use area is unlimited.

First, the establishment of guide concession areas encourages the guides to establish a vested interest in the conservation health of their allocated areas. This emphasis on stewardship is a much more behaviorally sound methodology for conservation (wildlife) management than the current system of unlimited guides in area which fosters an "every man for himself" philosophy.

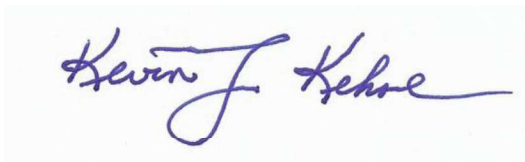
Areas that have dedicated guides with a vested interest in the management of those areas will also facilitate the execution of more extensive wildlife management to include predator control, habitat improvement, and more thorough and consistent wildlife surveys. The guides will essentially act as a force multiplier and important partner for the Department and Board of Game encouraging the undertaking of more labor-intensive projects. This enhanced ability will in turn encourage NGOs like AK WSF to provide the matching funds for Pitman-Robertson funding to execute more enhanced programs.

A study conducted several years ago by the Department and the University of Alaska Fairbanks showed that the number one complaint of Alaska resident hunters was overcrowding. Reduction of the number of guides operating in high use areas will go a long way towards eliminating this problem. Including the ability of guides to work harmoniously with the public and resident hunters into the selection criteria for concessionaires will also help eliminate the real and perceived friction between hunting groups.

One specific example that supports guide concessions is that Dall sheep in Alaska are currently managed under a full curl, or 8-year-old strategy. The harvesting of sub legal rams by hunters is not just illegal but detrimental to the availability of legal rams in future years and may actually have a negative impact on the reproductive capacity of specific sheep populations. Currently there is no impact on a guide's continuation to hunt on state lands despite a history of harvesting sub-legal rams. On federal lands, where guides must compete for concessions; a record of sub-legal harvest will hurt an applicant's chances of being awarded a concession again. The benefits to the resource and all users from a competitively awarded commercial land use system becomes obvious,

In addition to penalizing sub-legal harvest, the proposed system establishes a partnership with state wildlife professionals that can help prevent wildlife violations and poaching. This again provides a force multiplier for the woefully undermanned wildlife enforcement trooper staff.

The Alaska Wild Sheep Foundation encourages the passage of this bill to establish hunting guide concessions. Conservation of wildlife resources starts with sound stewardship. Failure to adopt a better system of managing commercial hunting on state lands prohibits the realization of the full potential of a team effort and perpetuates the friction between user groups. AK WSF strongly supports the creation of hunting guides concessions and we deeply appreciate your efforts to advance this critical piece of legislation.



Kevin J Kehoe, President
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From: James Smith <huntersmith54071@msn.com>
Sent: Sunday, March 10, 2024 6:51 AM
To: Sen. James Kaufman <Sen.James.Kaufman@akleg.gov>
Subject: James Smith Registered Guide 128878

Hello,

My name is James Smith and I'm a Registered Big Game Guide. I started in the guide industry in 2009. I guide for 6 months out of the year. I run my own business on BLM lands and I also guide for 3 other outfitters. The three I guide for all have federal guide use areas. This meaning they are the sole use registered or master guide's for that Guide Use Area.

I'm writing in support of the DNR guide concession program. I strongly advocate and support starting in problem areas like parts of the Alaska Range for Sheep and Moose and on the Alaska Peninsula for Brown bear. These areas are overran by guides. Year after year a-lot of guides that are in these areas complain multiple times and even submit complaints and violations to the Big Game Commercial Services Board about conflicts with other guides. In these particular areas there are no set number (allocations) for each species ie: moose, sheep, bear etc. Therefore there are a lot greedy guides who take an unlimited number of hunters which this takes its toll on the species being hunted and non resident hunters who come to this great state to fulfill a lifelong dream.

Having concessions in place will reduce in-field conflicts with other users and most importantly concessions are a great way to manage our species properly (this is most important). Take a look at the Kodiak National Wildlife Refuge Brown Bear management model this is the best management model worldwide.

I wanted to say Thank You for reading my email and if you have any questions please feel free to reach out via email or phone,

James R Smith II
Alaska HuntSmith LLC
907-388-6842
Registered Guide # 128878
You Can't Put A Price Tag On A Good Time.

Emma Torkelson

From: Paul Johnson <[REDACTED]>
Sent: Monday, March 11, 2024 9:58 AM
To: Sen. James Kaufman
Subject: Guide Concessions

Dear Senator Kaufman,

I wholeheartedly support guide concessions for several reason, the most important is the protection of resident hunters on state land. It's long passed due from when we had concessions before. Please feel free to call me about it, or if you would like to like me to talk about it to one of your aids. My very best Paul johnson. [REDACTED]

From: Jack Reakoff <[REDACTED]>
Sent: Monday, March 11, 2024 5:00 PM
Subject: Support center bill 253

Dear Senator Kaufman,

My name is Jack Reakoff I live in Wiseman Alaska for the last 53 years. I am writing in support of Senate Bill 253, to establish a Guide concession permit. The department of natural resources would administer the concession permits.

I am the Koyukuk River Advisory committee chair to the state board of game and board of fish. These comments represent my personal perspective. The committee has not had a chance to discuss this issue.

I was trained up to a registered guide license in the 70s and 80s. My dad was a master guide and held he held a Guide concession permits which limited hunting pressure within specific guide use areas. Guide use areas were abolished in the late 80s causing high competition and the problem this bill seeks to address. Unlimited access by multiple guides for finite game resources has always been necessary.

There are many areas in Alaska, that have experienced severe climate events that are vastly reducing harvestable surplus for Dall sheep, Caribou, and moose in several game management units.

It is now more than ever necessary to control unlimited access by all guides in guide use areas that are on state or BLM lands.

Where I live in Central, Brooks Range are there are too many guides attempting to take too many clients for the very few remaining Dall sheep, and moose. Overlapping guides have no reason to reduce their harvest if they are in competition with other guides, who will take the same animals.

Conservation ethic on these lands is nearly nonexistent by commercial guides. Game populations suffer when harvested beyond sustained yield. This problem is beyond what the Alaska board of game can address with allocation.

Some of the problem areas are in game management units 26B, 24A and 24B, and 25A in the Brooks Range. We are Alaska. Range also has the same problems in 20A and 19C. There are probably many other areas of Alaska that would have competing guides for other species. These areas need to have guide concession permits, sooner than later.

All hunters will benefit from reduced competition for the limited resources, if guide concession permits are implemented.

I appreciate your consideration of my comments to the betterment Alaska's use of our valuable wildlife populations,

Jack Reakoff
Wiseman, Alaska

From: Jay Stanford <jaystanford@ultimathulelodge.com>
Sent: Monday, March 11, 2024 11:16 PM
To: Sen. James Kaufman <Sen.James.Kaufman@akleg.gov>
Subject: SB 253 Guide Concessions on State Land

Dear Senator Kaufman,

First off I want to thank you for sponsoring SB 253 (Guide Concessions on State Lands). I am a registered guide and board member for the Alaska Professional Hunter's Association. I have primarily guided on federal lands, where exclusive guide areas are in affect, and I believe that is better way to operate for everyone involved. It gives a better experience for the client, makes for less conflicts with residents, and most importantly it's better for the animals. Parts of Alaska has become overcrowded and this bill will help with that. I believe, as guides, we need to hold ourselves to a high standard and regulate ourselves so that we have a positive future in the state. Thank you again for sponsoring SB 253.

Sincerely,

Jay H. Stanford
Registered Guide 117647


From the desk of

Sam Rohrer
P.O. Box 1388
Kodiak, AK 99615

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March 12, 2024

Senator James Kaufman
State Capitol Room 115
Juneau AK, 99801

RE: Letter of Support for SB 253

Senator Kaufman,

Thank you for sponsoring SB 253. I previously sent you a letter of support, written from my perspective as President of the Alaska Professional Hunters Association. This additional letter of support is to express my personal support for this legislation.

I strongly believe that a Guide Concession Program on state lands is in the best interest of resident hunters, subsistence users, the guiding profession, and the State of Alaska. Currently, there is no limit to the number of hunting guides that can guide in a geographic area on state lands. This often leads to congestion in the field, conflicts between hunters, and generally a lesser hunting experience for all involved. In contrast, on federal lands, where individual guides are limited to specific geographic areas, there is less conflict and virtually no congestion. This leads to better experiences for all involved.

A Guide Concession Program also reduces the burden on law enforcement. Currently, when state troopers or federal law enforcement conduct field checks on federal lands, they know who the Registered Guide is that is responsible for guided hunts that are being conducted in each area. If there are safety concerns, any reports of conflicts or violations, enforcement officers immediately know who to contact. On state land, where multiple guides can be working in one area, it is often difficult for law enforcement to know who the responsible parties are.

Hunting guides, who operate on federal lands are bound to follow specific operations plans that include information on how they will treat the land, run their camps, and interact with other hunters in the field. If the federal land agency finds that the hunting guide is violating their operation plan, they have recourse to revoke the concession. Contrast this were state land agencies have little to no recourse to revoke the land use authorizations of even the worse "bad actor" hunting guides on state land. However, under a State Guide Concession Program, DNR would have the ability to not only sanction bad actors, but also revoke their land use authorizations when necessary.

A Guide Concession Program on state lands is good for all users and good for Alaska. Thank you again for sponsoring SB253.

Sincerely,

Sam Rohrer
Master Guide #204

907-486-4074
907-539-1828
sam@kodiakbearcamp.com

From: Cabot Pitts <alaskawildwind@gmail.com>
Sent: Tuesday, March 12, 2024 12:10 AM
To: Sen. James Kaufman <Sen.James.Kaufman@akleg.gov>
Subject: Support for SB 253

Dear Senator Kaufman,

I am writing in support of SB 253. My name is Cabot Pitts and I am a resident of Palmer, AK. I wanted to reach out and thank you for sponsoring SB 253. As a registered hunting guide in the state, it is critically important to have concessions on State Lands. I have been a registered guide since 2010 and have operated on both state and federal grounds. The high areas of pressure and contention seem to stem on the open grounds of stateland. I believe that with the correct implementation of a concessions program on stateland, this can directly benefit the highly sought after and valuable game resource our state has to offer. Giving a higher regard to a concession area, will hold individual concessionaires more responsible in protecting our game within those areas. By managing the resource for the betterment of the area; not just for trying to make a quick dollar and then moving on to another open area to do the same thing will benefit all users (subsistence, non-commercial and commercial). I again am in full support of SB 253 and I thank you for sponsoring the bill.

- Cabot Pitts

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Cabot Pitts
Alaska Registered Guide And Outfitter #1299
Alaska Wild Wind Adventures
(907) 414 - 5434

From: Mike Zweng <alaskaadventure@live.com>
Sent: Wednesday, March 13, 2024 4:13 AM
To: Sen. James Kaufman
Cc: Emma Torkelson
Subject: Support for SB 253

Senator Kauffman

I am writing this letter to say thank you, and express my full support of SB 253 regarding a state guide concession program. I have been a hunting guide for 18 years and have operated on state land, private land, as well as on federal land. Having experience guiding on land managed by various managers gives me a unique perspective to understand what works, and conversely where there are difficulties.

A guide concession program solves many problems, and I believe it is by far the best solution for all user groups. I understand that this is not the easiest solution to implement, however the best solutions to problems are seldom the easiest to implement and I believe this is the right time to implement such a program.

Implementing a guide concession program will benefit resident hunters. One of the issues on state land is an overcrowding of guides, which in turn causes conflict with resident hunters. This is not a good experience for anybody. By only having the most qualified guides operating in a Guide Use Area, it will allow resident hunters to have less guided hunting pressure and allow the resident hunter to even communicate with the guide operating in the area and formulate a plan to avoid conflict. This is not practical when there are many guides operating in one area as in the current model.

Implementing a guide concession program will also reduce conflict between guides. The program and selection criteria will be designed to select the most qualified guides to guide in the area. Guides will have to be the best they can be by not having violations, reducing conflict complaints, have a better safety plan, etc.. since they know this will be some of the selection criteria if they wish to guide in this area. It will naturally improve the quality of all guides.

Implementing a guide concession program will also provide a better experience for guided hunters since there will be fewer guides in the area. The guide selected to operate in the area will be able to somewhat manage game and provide feedback to biologists to improve the quality and quantity of game which in turn will improve the hunting experience for the client.

I have personal experience guiding on state land but I also have a Federal Wildlife Refuge Special Use Permit to conduct hunts on federal land on Kodiak. I can certainly see the benefits of the federal land guide concessions and can speak first hand of their benefits. All aspects of the hunt for all user groups are better when operating in an area that has the federal guide concession program and I believe having a state guide concession program would have the same effect.

I do not support a drawing type of lottery system. A drawing permit system causes much frustration with clients because they may have to put in the drawing for several years and may not ever draw a permit. If they do draw a permit, they may actually not be able to go on the hunt since it could conflict with other life events. I had a hunter that finally drew a Kodiak brown bear permit after years of trying but they had to

cancel because of his daughter's wedding. He did not try again for a permit. From a guide perspective it is extremely difficult to run a business when you don't actually know how much business you will have until the drawing results come out. Employees of the guide also suffer because they may not know if they will even be employed. With a drawing system, there will still be multiple guides in the area and it could cause the same conflict as mentioned above and it would not have the benefit of a limited number of guides managing the area and acting as a biological liaison to the wildlife biologists managing the game.

Please continue support of SB 253 and if there is any other information I can provide from my experiences operating on various lands, please feel free to reach out to me at any time.

Mike Zweng
Registered guide #1290
[REDACTED]

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From: Jacob Fletcher <fletchersguideservice@gmail.com>
Sent: Wednesday, March 13, 2024 9:36 AM
To: Sen. James Kaufman <Sen.James.Kaufman@akleg.gov>
Subject: SB253

Good morning Senator Kaufman,

My name is Jake Fletcher, I'm a registered guide in Alaska, I've worked in the guiding industry in Alaska for more than 20 years now. I would appreciate the opportunity to talk briefly about SB253. This is a great idea for many reasons, I just started my second term on the State of Alaska's Board of Game. I do not speak for the board in any way, and can only speak for myself personally. The guide concession program would be an amazing management tool. The DNR has no way to effectively deal with (bad guides on state land). This whole concept of guide concessions is not a new one; it's been thoroughly vetted on Federal Lands and in short produces a much better hunting experience for non-resident hunters and resident hunters alike.

I know the above statement is true, because I am fortunate enough to have an exclusive guide use area on the Kodiak National Wildlife Refuge and the Kenai National Wildlife Refuge. I've also guided on state lands and seen the sharp contrast between the two. This guide use program would create great guide stewards of the land.

Thank you for your time,
Jacob Fletcher

Justin Dubay
PO BOX 879547
Wasilla, AK 99687

akidubay@yahoo.com

Dear Senator Kaufman,

My name is Justin Dubay and I am a registered hunting guide and outfitter as well as an Alaskan resident for 29 years. I appreciate you sponsoring Senate Bill Number 253.

I operate a good part of my business on State land in GMU 19 C. It is my belief that this bill would not only improve the quality of the hunts for both residents and non residents but would cut down on numbers of people concentrated in areas. There would be less conflicts between guides and other guides and guides and residents.

I do hold a concession type permit on a US Fish and Wildlife Refuge in Alaska and it seems to be a great way to limit the amount of hunters in one area, better manage the wildlife and have less impact on the land. I believe this would allow guides to provide a better quality hunt and experience for their hunters. I will personally be applying for one of these concessions myself.

I appreciate you reading this and would like to thank you again for sponsoring this bill..

Sincerely Justin Dubay



P.O. Box 1961 Kodiak, Alaska 99615 (907) 486 - 3008
E-mail: paul@kodiakoutdoors.com

March 13, 2024

Senator Kaufman,

I'm writing in support of, and to thank you for sponsoring, SB 253.

I have been guide outfitting since 1985 and hold Alaska Master Guide/Outfitter license GUIM160. I have been operating since the last state guide concession area system was in place and currently operate on federal lands which use a guide concession system. Concessions work very well for a multitude of reasons.

Concessions are extremely effective for managing the users and importantly, the resource. The consistent and predictable level of harvest is helpful to managers and guides are very good at helping harvest at a sustainable level.

Concessions also greatly benefit resident hunters as there are reduced conflicts, less crowding and a better game population.

Concessions also enable a guide to offer a higher quality experience for their clients, often for a higher price, thus benefiting our great states reputation and coffers.

Additionally, concessions make enforcement much easier and gives the state the ability to maintain high quality operators.

Please feel free to reach out with any questions or for more information.

Sincerely,


Paul A. Chervenak

Dear Senator Kaufman,

I am writing to you in support of SB 253, which would allow Alaska DNR to establish a Guide Concession Program for hunting guides.

I have been involved in the guiding industry for nearly 50 years, having started in the mid 1970's and I currently hold Master Guide License #94. When I first became involved in the guiding industry, the Alaska "Guide Board" issued "Guide Areas" to individual guides based on their history of use in that area. Although the Alaska Supreme Court found, in the Owsichuk decision, that the manner in which these "Guide Areas" were issued was unconstitutional, I believe the *intent* of this area allocation system was valid. I have never believed that unrestricted access to state lands, by guides-outfitters for the harvest of our big game resources is good policy. I believe that allowing an unlimited number of hunting guides to access State land to conduct commercial hunting businesses is *not* good policy. Unregulated access by hunting guides to State land is potentially detrimental to Alaska's wildlife populations, Alaskan resident hunters, nonresident hunters and to the hunting guides themselves.

When the Owsichuk decision was announced, Federal agencies immediately began developing programs to limit access to Federal lands by hunting guides. This program has now been in effect for over 30 years and has been successful in protecting wildlife and reducing conflict between *all* user groups on Federal lands in Alaska. Unfortunately, at the time of the Owsichuk decision, the State of Alaska did not develop a constitutionally acceptable program for allocating hunting guide activity on State land. Now many years later, we have multiple areas throughout the State where State lands are being over utilized by licensed Alaska hunting guide-outfitters. These areas of over utilization are, in some cases, having detrimental effects on wildlife populations and causing conflicts among user groups. I believe a program to limit the number of hunting guide-outfitters on State lands will go a long way in reducing these detrimental impacts and be beneficial for our wildlife and for all user groups.

Thank you for your consideration of my comments with regard to SB 253.

Respectfully,

Richard A. Guthrie, Master Guide-Outfitter #94

From: Rob Jones Jr.
PO Box 670610
Chugiak, AK 99567

To: Sen. James Kaufman
Email: Sen.James.Kaufman@akleg.gov

Hello Senator Kaufman,

My name is Rob Jones Jr., a registered hunting guide, License no. RGUI778. I am writing to thank you for sponsoring Senate Bill No. 253.

I operate a guiding business in Game Management Unit No.19C. If this bill passes and is implemented, 19C is the game management unit chosen for the pilot program for this state land Big Game Guide Commercial Concession Program to be implemented.

I operate my guiding business solely in GMU 19C. I believe this program would greatly improve the quality of the hunts provided to hunters that participate in fully guided hunts. It would help in relieving congestion in the area. There would be less conflicts between guides and other user groups such as resident sport hunters, subsistence hunters.

The Concession type programs have been in place on some federal lands for several years now, such as National Park Preserves and US Fish & Wildlife Refuges. It has proven to be easier for wildlife biologists and managers to properly deal with harvest issues. It gives the state and federal enforcement agencies a cleaner way to enforce game and land use regulations. It gives Alaska's guide industry more stability to operate and provides a higher quality service to the hunters that use this industry.

There will be a selection process involved to see who will receive the initial concessions within 19C. I personally will be one of guides vying for these concessions. Even though I am a private landowner within the 19C area and have been operating a guiding business there since 1991 I understand that I will still have to compete with other guides to obtain a concession permit there through a fair selection system set up through the state of Alaska. I do understand this and accept the risk of losing out. But I still feel the system will improve the quality of hunting there for all user groups.

Thank You for taking time read this and again for sponsoring this bill.

If you have any questions you'd like to ask me I will be available by phone or email at [REDACTED]
or rrhuntingak@gmail.com

Rob Jones Jr.



May 10, 2024

Sent Via Electronic Mail

Senator James Kaufman
State Capitol Room 115
Juneau AK, 99801
Senator.James.Kaufman@akleg.gov

Re: Support for SB 253 and HB 396

Dear Senator Kaufman:

On behalf of the Alaska Federation of Natives (AFN), I write in support of SB 253 and HB 396, both titled "An Act establishing a Big Game Guide Concession Area Permit Program on land in the state relating to the duties of the Big Game Commercial Services Board, the Board of Game, the Department of Fish and Game, and the Department of Natural Resources; requiring the Board of Game to establish an initial big game guide concession area; and providing for an effective date." These bills represent a significant step forward in the management and conservation of Alaska's wildlife resources, ensuring sustainable practices that benefit all stakeholders, including rural and subsistence hunters.

Alaska's state lands are crucial for our subsistence resources, which are integral to the cultural and economic well-being of Alaska Native communities. However, the current system of unlimited commercial hunting guide operations on state lands has created challenges, particularly for hunters from rural Alaska Native communities, who often find themselves at a disadvantage due to increased competition and resource depletion.

SB 253 and HB 396 propose necessary reforms to introduce a structured and sustainable framework for commercial hunting on state lands, similar to the successful federal land management system. By implementing an entry system for commercial guides, these bills aim to:

- **Promote Resource Stewardship:** Limiting the number of guides will help ensure that wildlife populations are managed sustainably, prevent over-harvesting, and allow for better resource conservation.

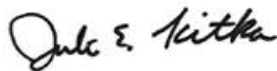
- **Protect Subsistence Hunters:** By reducing competition from overuse by commercial operations, these bills will help preserve the subsistence rights and opportunities for Alaska Native communities.
- **Ensure Best Practices:** By requiring guides to apply for permits based on their observance to best practices, these reforms will encourage higher standards, safety, and customer service, benefiting the overall ecosystem and relations with local Alaska Native communities.

AFN also highly encourages the incorporation of consultation with major landowners, including Alaska Native corporations, within these units. This consultation will ensure that the unique perspectives and rights of these stakeholders are considered when issuing guiding permits and will promote a more inclusive and effective management strategy that respects traditional land uses and supports local economies.

AFN believes that these changes are essential for balancing the diverse needs of all Alaskans, ensuring that our wildlife resources are managed responsibly for future generations. As such, I urge you to support SB 253 and HB 396 and help establish a fair and sustainable management system for Alaska's state lands that respects the rights and traditions of Alaska Native communities while fostering economic opportunities for all.

Thank you for your leadership on this critical issue. Please do not hesitate to contact me to discuss this issue in more detail.

Sincerely,



Julie Kitka
President