
From: Steven H. Perrins II <guide88@hotmail.com>
Sent: Tuesday, May 13, 2025 9:13 AM
To: House Finance
Cc: Steve Perrins
Subject: SB97 - Guide Concession Area

Hi Committee Members,

Thank you for taking a moment to review some additional thoughts before you hear SB 97 today. As the second-generation owner of Alaska's oldest hunting lodge est. in 1937, former APHA board member, and former Legislative Staff, it is with deep knowledge of the guiding industry that I write these comments. I have always generally supported a Guide Concession Bill and think it is needed in our State. Overall, this bill is good, and I think it will work. If we can make two minor tweaks to it, it would be a great law in my opinion. I do not want to do this at the risk of killing this piece of legislation, like I mentioned it will work as is, but I believe when making laws we should be prudent to put the best words into statute as possible as it's difficult and costly to change them after.

ITEM #1 - Page 6, lines 2-7 state:

*(3) "limited big game guide concession area permit" means a concession permit made available by the department through **a random draw application process** that provides more restrictive limitations than a full big game guide concession area permit on the number of clients that a permit holder may provide big game guided hunts to in the area and limits the species the permit holder may provide guided hunts for in the concession area.*

The issue here is that to award the limited concession based on a random draw does not get you the best operator in the area. If conservation, land stewardship, client experience, good business practices, less problems with legal issues etc. is your goal than this spot should be awarded based on the next highest score in the developed criteria. When dealing with our resources it is important to have good competent people there to help protect and manage it. A random draw of anyone who applies could get you a variety of people who could very possibly be bad actors and extremely harmful to our resources.

My suggestion would be to either change the wording to **the next highest score** or simply state that the limited concession permit will be decided by regulation. I always find it better to put details like this in regulation so the departments who better know the details of the industry can form the proper wording to avoid unintended consequences.

ITEM #2 - Page 4, lines 7-10 state:

*A concession permit issued under this subsection is valid for 10 years from the date issued. **A concession permit issued under this subsection may not be extended or renewed without the same open and competitive process provided by the department for the issuance of a concession permit under this subsection.***

For similar reasons stated above I would suggest deleting the section I put in bold and leave the first section with added wording that the departments will create regulation for acceptable ways to re-award the permit (whether that's for the existing permit holder or a new one). This is not to say that the department won't use the same open and competitive process, but there may be a better way to do it that they can decide in

regulation that meets the standards of the Owsichuk lawsuit of 1988. The main problem with this exact wording locked into statute is that it encourages poor conservation, costs the department more money, and does not promote good business practices. Besides, what other business in Alaska is limited to a 10-year life span?

Poor conservation - If a guide knows he's at the end of his 10-year term and could lose his area, he may be likely to book extra hunters and overharvest so that he can secure his financial future and provide for his family.

Higher costs - By forcing in statute a competitive process like this every 10 years you are forecasting more costs and higher workload for government employees when a simpler, less expensive, and still fair option may be available and worked out in regulation.

Good business practices- Many hunters are booking 2-3 years in advance for trips like this. If you start this process 3 years before the permit expires the guide will be able to book out those clients if he's awarded the permit, but if he's not awarded the permit, he'll be encouraged to overharvest the last few years to secure his financial future.

This part is better decided in regulation by the departments and industry who better know the repercussions of these words.

I know you have a lot on your plate so thank you for your time and consideration in this matter.

Please continue to pass this bill along into law.

Respectfully,

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~God Bless~