

Linda Hay

From: Rep. Eric Feige
Sent: Wednesday, March 06, 2013 2:11 PM
To: Linda Hay
Subject: FW: HB158,

From: Mike and/or Karen Cowan [<mailto:crosshairsofalaska@yahoo.com>]

Sent: Wednesday, March 06, 2013 1:39 PM

To: Israel Payton; Representative.Alan.Austeman@akleg.gov; Rep. Bill Stoltze; Rep. Wes Keller; Rep. Bob Herron; Rep. Charisse Millett; Rep. Eric Feige

Subject: HB158,

Dear Representatives,

I'm strongly opposing this HBO 158, Based on the fact that there has been only hear say about the problems at hand. We have a problem with the entire user groups as a whole. They want to limit and and put strong fees on registered hunting guides and not restrict residents or air charters that saturate each unit with hunters (clients.) You have to remember that the **NON- Resident** hunters pay a lot of money to the State of Alaska that **Truly** funds our Fish and Game departments and other departments throughout the state.

When you take away **2/3rds** of the Guides you eliminate a great deal of that revenue. Not only will you lose that revenue, but you will force the guides to raise their prices so high that you're middle class non-resident will not be able to afford to hunt in Alaska.

Just off the top, before you can even operate you have to come up with at least \$15-\$20,000.

Now that my friends, is bad business!

This economy right now is so unstable and unpredictable. People are holding on to their money. So my solution would be to raise our DNR fees higher and not put the burden on a few guides to fund a program which only benefits a few. The APHA only has 125+ members; they do not represent the whole guiding industry.

If you took a vote right now from each and every guide I will bet you will have more opposing this program than you would have agreeing with it.

There is 1,338 give or take a few Registered, Master, Ass. and Class A guides. Your offering only 300 **Exclusive** guide use areas. Its **Exclusive**, one, because I will be one of the only ones licensed in that unit if I'm awarded the area.

Its all about the money. Clark Cox(DNR) asked me how much I pay for my fee's and when I told him, he said, and I quote - "That's nothing!" I replied, "So it's all about money then?" And he was silent when I made that comment.

Additionally, you will have the cost of living increases and so forth - when will it stop? This program will be way too expensive. The numbers show that!

You are banking on the guides to book hunts each year in order to fund this program. If this was a perfect world than you have nothing to lose, but its not. Every year is different, some better than others. You are putting all your eggs into one basket. One day those eggs will brake.

Now let's say there's not enough monies coming into this program for another year. So lets raise more fee's. This just does not add up **PERIOD.**

Plus there is no Emergency Transferability in case of a Heart attack, Death or major illness in place. What happens to clients and loved ones. Oh I'm sorry but your area has been given to the next guy in line. **Law Suits!! to the poor family who has no chance to have their family memebbers who are licensed to help out.** Think about that one.

I have been guiding in this state for over 30 yrs. I do not want more government control over free enterprise then we already have. It's simply not fair! This country has been built on free enterprise and the liberty of life.

Another point, you will probably have to cut other programs in order to come up with \$600,000 + dollars. How unfair is that, knowing other programs will suffer. The general fund only has so much in it. So let's not waste it on a program that only fuels a few. Why try to fix something that's not broken?

Sincerely,
Mike Cowan

Safety First in Hunting & Fishing
Mike Cowan/Registered Guide & Outfitter
Alaska Hunting & Flyout Fishing trips
35555 Kenai Spur Hwy
Soldotna, Alaska 99669
(907)394-2924

Northwest Missouri Hunting
Whitetails, Turkey's & Snow geese
26432 X ave.
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www.crosshairsoutfitters.com

Linda Hay

From: Rep. Eric Feige
Sent: Thursday, March 07, 2013 5:55 PM
To: Linda Hay
Subject: FW: House Bill 158

FYI
Mike

From: Carolyn Nichols [<mailto:carenichols@hotmail.com>]
Sent: Thursday, March 07, 2013 5:39 PM
To: Rep. Mia Costello; Rep. Eric Feige; Rep. Alan Austerman; Rep. Bob Herron; Rep. Jonathan Kreiss-Tomkins;
reprwsentative.Charisse.Millett@akleg.gov
Subject: House Bill 158

I am in favor of house bill 158.

This Bill benefits resident hunters by controlling the number of Guide operations in any given area.

This will also benefit the long range wildlife conservation. It is crucial to the stability of the Big Game Guide industry which provides a lot of jobs of various types in many communities, both large and small throughout the state.

I have an assistant guides license and work for a guide in the interior in a federal area and I am a resident in Sitka who enjoys hunting very much. I see and understand this Bill from both aspects and support it.

Thank You

Carolyn Nichols
111 Knutson Drive
Sitka, AK 99835

Linda Hay

From: Rep. Eric Feige
Sent: Saturday, March 09, 2013 11:50 AM
To: Linda Hay
Subject: Fwd: HB 158

FYI
Mike

Begin forwarded message:

From: Mark Miller <mark@talaheimlodge.com>
Date: March 9, 2013, 9:52:26 AM AKST
To: <rep.eric.feige@akleg.gov>
Subject: HB 158

Dear Rep Feige,

I would like to express my concern over HB 158. I've been a registered guide (#390) since 1978. I've seen guide areas come and go. The last time we had guide areas it was like land dealings. Areas were sold and bought. I am not against guide areas entirely, but I am not for the DNR to implement it. We already have a Guide Board that was put in place to look after guides, so this should be taken care of by this appointed board. After attending several of the DNR meetings on these guide areas I came down to the conclusion that the best lier wins. I think if there are to be guide areas, the guide board should address this issue. Most guides already deal with about five government agencies at a minimum, why add another. Please consider my request when bringing up HB 158.

Sincerely,

Mark Miller

Mark Miller
Lodge Owner
PO Box 190043
Anchorage, Alaska 99519
www.AlaskaTalaheimLodge.com
(907) 248-6205 office
(907) 440-0614 cell



Linda Hay

From: Joey Klutsch <joeyklutsch@gmail.com>
t: Wednesday, March 06, 2013 10:03 AM
To: Rep. Mia Costello
Cc: Rep. Eric Feige; Rep. Alan Austerman; Rep. Bob Herron; Rep. Charisse Millett; Rep. Dan Saddler; Rep. Mike Hawker; Rep. Craig Johnson; Rep. Kurt Olson; Rep. Paul Seaton; Rep. Peggy Wilson; Rep. Geran Tarr; Rep. Chris.Tuck@akleg.gov; Rep. Wes Keller; Rep. Neal Foster; Rep. Gabrielle LeDoux; Rep. Bob Lynn; Rep. Charisse Millett; Rep. Lance Pruitt; Rep. Max Gruenberg; Rep. Bill Stoltze; Rep. Alan Austerman; Rep. Mark Neuman; Rep. Scott Kawasaki; Rep. Steve Thompson; Rep. Tammie Wilson; Rep. Les Gara; Rep. David Guttenberg; Sen. Cathy Giessel; Sen. Fred Dyson; Sen. Peter Micciche; Sen. Click Bishop; Sen. Lesil McGuire; Sen. Anna Fairclough; Sen. Hollis French
Subject: DNR Guide Concessions Program
Attachments: DNR Guide Concession Program - Joey Klutsch.docx

Please see attached document.

Respectfully,

--

Joey Klutsch
Registered Guide
Katmai Guide Service

PO Box 222
King Salmon, AK 99613
(907) 439-3030

Dear Representative Costello,

My name is Joey Klutsch and I am a Registered Guide (RG 1277). I guide on the Alaska Peninsula, Kodiak Island, and the North East Brooks Range, all on Park Preserve and National Wildlife Refuge lands where some form of a sole guide use area system is in place. I have been both a fishing and big game hunting guide my entire working life and intend on making it my life long career. Guiding is my exclusive employment. I have grown up in the guiding business working primarily with my father, Joe Klutsch, as well as a select few other well respected guides. I have a passion for the guiding profession and it is of the utmost importance for me to see that quality guiding in Alaska is preserved for future generations. It is for this reason that I ask for your full unwavering support of the DNR Guide Concession Program.

I remember when I first became a Registered Guide back in 2009. It was one of the most important accomplishments of my life at that time, and I was eager to start my own guiding business. However, I immediately came to the conclusion that contracting my own hunts on open State Lands would not be beneficial. I saw the problems on State Land and did not want to be a part of them. I instead chose to work for long established guides who had Concession Contracts or Special Use Permits on Federal Lands where access was limited to one or two Guides and the quality of experience was extremely high for the clients. I did not want to take someone hunting on State Lands that are often overcrowded with other guides, thus limiting my hunter's quality of experience. Having a State Land Concession program would greatly improve quality of experience by eliminating overcrowding altogether.

In addition to overcrowding, State Lands often experience overharvest of game because of the high level of guided effort. This is something which the DNR program will address. It is perhaps the most important issue that the DNR program will resolve. At present, there is no check to the number of guides that can register to conduct hunts on any given State Land area, and in many cases there is no restriction to the level of harvest in those areas. As a result, many game populations have suffered, especially in Dall Sheep areas, and more recently even in Brown Bear areas. The last thing we want is for the health of our game populations to be put at risk. The DNR Guide Concession program will alleviate this problem by limiting the number of guides registered in an area, placing caps on the number of animals that may be harvested by guides in an area, and encouraging good stewardship through a competitive renewal process. Much like on Federal Lands, it will be in the best interest of the guide(s) permitted to hunt a given State Land Concession to ensure healthy game populations. Guides will be required to work under strict operations plan at an extremely high standard in their given area. They will be held accountable for their actions. It works on Park Preserve and National Wildlife Refuge Lands, and it will work on State Lands if this program is implemented.

As a young Registered Guide (I am 27 years old) as well as a full time Rural Resident and subsistence user in King Salmon, Alaska, I often see the contention between resident hunters and guides. I will say with complete confidence that a great deal of this animosity comes from the high level of hunting pressure on State Lands brought on as a result of too many guides operating in a given area. As you know, on Park Preserve and National Wildlife Refuge Lands there are concession contracts or special use permits in place to limit the number of guides in an area. This has proven extremely effective at keeping hunting pressure down as well as nearly eliminating user conflict between subsistence or general

resident hunters and non-resident guided hunters. If guiding in this State is to survive it is extremely important to reduce conflict in the field amongst user groups, especially between guides and subsistence users on State Land.

Overharvest of game and competition for those animals with residents on State Land will inevitably lead to permit drawing for non-residents being implemented. Non-resident allocation will continue to shrink and the guiding industry will suffer greatly. Eventually it will no longer be viable. We may even see all non-resident allocation being eliminated. This is the situation that guides will face if the DNR Guide Concession program is not implemented.

I understand that as a young guide in Alaska, I have less experience than some of my mentors and am therefor less likely to benefit in the short run if the DNR Guide Concession Program is implemented. Although I am a top notch guide, there are others with many more years' experience than I have who stand a better chance at winning one of the newly created State Land Guide Concessions, simply because of their extensive years in the business. There will be many younger people like myself who may suffer the same fate of not being able to win one of these newly created areas right off the bat. However, this not a bad thing, in that it will ensure that we are dedicated to the profession and are willing to work for long established guides for longer periods, gaining valuable experience in the process. It will also weed out the people who are less serious about making guiding a career. More importantly, the DNR Concession Program will get rid of unscrupulous guides who seem to inundate State Land. In summary, we will all benefit in the long run.

We have an amazing opportunity to fully implement a Guide Concession Program on State Lands similar to those which have proven so very effective on Fish and Wildlife Service and Park Preserve Lands. This will guarantee that guiding remains a viable way of life in this great State, and that the quality of experience which is so important to our non-resident clientele is ensured. It will reduce conflicts with other user groups, especially subsistence users and reduce animosity towards guides in villages. Most importantly, perhaps, it will safeguard our game populations on State Lands from overharvest by limiting use. I appreciate your consideration in this matter and ask for your full support in this program and the funding necessary to implement it.

With Best Regards,

Joey Klutsch

Registered Guide 1277

Linda Hay

From: Loren Karro <lorenk@mtaonline.net>
t: Tuesday, March 05, 2013 6:51 PM
Subject: Rep. Eric Feige
HB 158

HUNTER CREEK GUIDE SERVICE

Loren Karro, Reg. Guide # 941

26239 E. Buckshot Drive

Palmer, AK 99645

908-745-3712

lorenk@mtaonline.net

Dear Rep. Feige;

I would like to thank you for co-sponsoring House Bill 158, Authorizing the DNR to implement a Guide Concession Program. As a professional big game guide, I strongly back the DNR GCP as a necessary tool to decrease resident/guide and guide/guide conflicts in the field, to work to benefit the long term conservation of our precious wildlife resources, and to keep the big game guiding industry in Alaska healthy and stable. I operate out of the Mat Su Borough and Port Heiden. I see first-hand the economic benefits of the guiding industry in Alaska, in communities big and small. My partner and I spend close to \$200,000 annually in support of our business, and virtually all of it is spent in Alaska. We purchase our supplies and equipment from local stores and industries, we hire local people and we help keep small rural businesses alive. We utilize local road houses, country stores and service people. We also contribute both wild meat and excess food stuffs to local families within the small villages of Alaska.

As a mother, I particularly value the good work ethics and appreciation for Alaska's wildlife and habitat that my family has learned through their exposure to this industry. Many of my family have worked with me, three generations from siblings to nephews to grandchildren. Family time in Alaska's great outdoors is perhaps our greatest legacy, and sharing this love and appreciation with our clients is a privilege and a joy.

I see the Guide Concession Program as the best way to protect long term wildlife resource conservation and to help local hunters by decreasing crowding in the field. In addition it will help to preserve the excellent worldwide reputation of the professional guide industry in Alaska, and thus will help to protect the economic benefits it produces throughout Alaska. I support the Guide Concession Program and have worked hard for 5 years to see that it is brought to fruition. Hopefully HB 158 will be one of the final steps towards its implementation.

Sincerely,



Lauren Karro

Registered Guide # 941



Linda Hay

From: Brian Peterson <brian.peterson4@att.net>
To: Tuesday, March 05, 2013 1:51 PM
Subject: Rep. Mia Costello; Rep. Eric Feige; Rep. Alan Austerman; Rep. Bob Herron;
representative.charrise.millet@akleg.gov
House bill 158

Representatives,

My name is Brian Peterson and I am a Master Guide and Outfitter in the state of Alaska. I would like to send my support for house bill 158 to save the guiding profession in the state of Alaska.

I am a full time resident who operates a hunting and fishing lodge on Kodiak Island. The guiding profession has been under attack by "hobby guides" for the last couple of decades. These guides are part timers, who generally arrive in an area and operate on top of the well established operators causing conflict and over harvest of resources. I personally have had four new "hobby guides" start operating on top of me in the last five years. I have been in the same location the last 29 years with substantial investment in the area.

If the DNR guide concession program is not implemented in the very near future the board of game will greatly reduce non resident harvest, reducing state income, and guaranteeing the entire industry becomes hobby guides, hoping to draw a permit for a client on rare occasion.

The industry has over seven years of developing the best option to save the profession. The DNR GCP is what has come out. While not perfect, it is the only legal option that can save the profession from the hobby guide industry.

To those who oppose this program, ask if they would prefer drawing permits for all non resident allocation and how long they have been operating in the same area. Also ask them what investment they have. This program has been a long time in being developed and is presently the only option that can save the profession.

You will find those who are opposed to this are generally part of the problem and do not offer a solution.

Thank you for your consideration.

All the best,

Brian Peterson

Alaskan Master Guide 114

Linda Hay

From: Rep. Eric Feige
Friday, March 01, 2013 12:56 PM
To: Linda Hay
Subject: FW: DNR GUIDE CONCESSION COMMENT - Nate Turner

From: Nate Turner [mailto:alaskanate@gmail.com]
Sent: Friday, March 01, 2013 12:23 PM
To: Rep. Eric Feige
Subject: DNR GUIDE CONCESSION COMMENT - Nate Turner

Dear Representative Feige,

I am writing in support of continued funding for the DNR Guide Concession Program. I have heard recently that there has been discussion regarding continued support of this program by the finance committee, and I feel compelled to weigh in while I have opportunity. My family and I have lived primarily a subsistence lifestyle in the Western Interior for more than 23 years now. I came to Alaska when I was 17 with my father, and I finished my final years of schooling through correspondence programs.

I have been involved in the Big Game Commercial Services Board processes since this board was reinstated in 2005. I have co-chaired a subcommittee on licensing standards for a number of years and have helped, I believe, bring forward some meaningful suggestions to raise the bar for qualifications to both obtain and hold any class of guide licensing. I am also currently the Vice Chairman of the Board of Game.

Other than trapping, and sometimes commercial fishing, there remain few viable methods for Alaskans to envision having a future living close to the land these days. A life changing and very rewarding opportunity came to me in my mid twenties when I was asked to help a neighboring trapper by working with him as an assistant guide in my own trapping area each fall. One opportunity lent itself to another over the years, and I now have the ability to support my young family both in town and while in the woods for a good portion of the year as a Registered Guide, employing a number of rural bush residents in my part of the interior to help guide and accommodate my hunters while they are in the country, and to also share the harvested meat from my hunts with those who have been unsuccessful in their own efforts during their fall hunts. The guiding industry has provided a rich and rewarding way of life for my family and I and has additionally benefited many rural residents in my part of the interior. I know this is true in various other parts of the state as well.

What has enabled me to do this, I believe, is that the remote area I guide in is inside of a National Wildlife Refuge where I competed for and obtained a 10 year tenure to have the sole right to offer big game hunts in a portion of the area. Having the ability to provide a guided hunt without competition from other guided hunters allows for my clients

to enjoy their time in the Bush, not feel hurried to “beat the other fellow to the game “, and be more selective in their harvest of game. It provides me a reasonable assurance of what kind of experience I can expect to be able to offer my clients from year to year, and no regrets for “the one that got away” (he may very well be there next year). The State and areas not too distant from me are under high competition and the stories I hear of conflict and competition for the opportunity to harvest animals in those areas genuinely makes me ashamed at times to have the guides in those areas ‘representing’ to the public what it means to be a professional hunter in Alaska. This problem is not statewide, but where it exists it is pervasive and ultimately uncontrollable without a program similar if not identical in nature to what DNR is currently proposing as the Guide Concession Program.

The currently proposed Concession program has been laid out before the public several times now, and it has been essentially shaped and refined through widely represented public input in combination with carefully addressing the legal mandates that had to be addressed as well. It is not a perfect program yet, but it is a very good one as proposed, which should provide continued opportunity for the majority of current guide services to stay in business. It will certainly cause each of us to adjust how we do our hunts, and will sometimes limit and other times even expand opportunities for the concessionaires who receive these areas. Ideally, most areas will not change much unless there are identified conservation of conflict concerns that need to be met. Ultimately, it is resident hunters who will benefit most from this program, with providing them an assurance that there will be a limited amount of professional competition they will encounter in the field in a given area, and an avenue to address conflict or other issues if they encounter it in the field. A secondary beneficiary of the creation of this program will be visiting hunters to our state. They will have a much better hunting experience in a guide concession, as our federal areas have already proven, and I believe the state will be better represented by service providers who will have to adhere to a preset standard of ethics, resource conservation, and professional conduct if they wish to keep their areas.

As a Board of Game Member, I can additionally say that we have been challenged with trying to mitigate the negative aspects related to these in-field conflicts, lack of conservation based hunts by some operators, and generally poor quality hunting services provided to clients in a number of areas of the state. This is especially true related to Dall Sheep sport hunting opportunities today, but there is reason to believe that these or similar issues may translate into other types of hunts as the hunting fields grow ever more crowded through our states increasing and ever more active hunting population.

My request is that you continue to support this program and its continued funding until it is able to stand on its own feet , if you will, and by doing so help us address these issues that both the public and the various boards involved with this industry have identified.

Sincerely,

Nate turner

Registered Guide #1036

Turner's Alaskan Adventures

PO Box 646

Nenana, Alaska, 99760 USA

Phone/Fax: 001 907 479 7535

Cell Phone: 907 451 0369

web: www.alaskan-adventures.net

Alaska Chapter SCI
PO Box 770511
Eagle River, AK 99577
(907) 980-9018



February 27, 2013

The Honorable Dan Sullivan, Commissioner
Department of Natural Resources
Division of Mining, Land and Water
Attn: Guide Concession Program
550 W. 7th Ave., Suite 900C
Anchorage, AK 99507

Dear Commissioner Sullivan:

The Alaska Chapter of Safari Club International wishes to express our appreciation for the opportunity to comment on the Department's proposed guide concession program. We believe this proposal is a positive step toward resolving a classic "tragedy of the commons" situation.

Safari Club International (SCI) is the world's leading hunting organization, and the Alaska Chapter is a leading chapter within SCI. The Alaska Chapter is also a leading hunting group here in Alaska having led the fight to preserve Alaska's hunting heritage for the last ten years as demonstrated in our efforts to stop anti-hunting initiatives at the ballot box, among other issues.

SCI Alaska Chapter strongly supports the formation of a guide concession area program. We believe that such a program will have lasting benefits for wildlife and for those wishing to continue the hunting tradition here in Alaska. We also believe that such a system will benefit the guide industry as it will elevate the professionalism of the industry and give non-resident hunters increased certainty that the hunt they are coming on will have a reasonable chance of success.

Although we believe the guide concession proposal is much improved over last year, we believe there are still areas that need improved or addressed. One such area involves the fees being proposed related to species hunted. SCI Alaska Chapter is opposed to these fees for three reasons.

We believe that under the agreement the State of Alaska has with the U.S. Fish and Wildlife Service regarding Pittman-Robertson funds that such a fee structure may be illegal and could jeopardize our funding for wildlife management from that source. Second, we feel that the imposition of such fees will jeopardize future initiatives by the Department of Fish and Game should the need arise for increased tag fees. Last of all, we understand the need to finance the proposed system, but we remain unconvinced that the Department needs additional funds to do so beyond the \$2000 fee being proposed for the concession areas.

SCI's Top Gun Chapter

For the remainder of our comments, we would like to note that they are given in the form of suggestions and should not be construed to be for or against the concession area proposal. We would like to note that there seems to be some redundancy in the framework of DNR's proposal. For instance, does the DNR really need a staff biologist assigned to this program? Why couldn't you utilize the same system being employed by the Board of Game to ascertain biological concerns and sustainability for each area.

We also noted that there seems to be a glaring lack of input from the industry in this process. We understand that you meant to keep as much bias out of this proposal as possible, but there are retired guides out there who could have been consulted. Venerable guides such as Dick Gunlogson is one such resource that could have been consulted.

The final item we thought to suggest is that the State already has a professional standards board to deal with the guide industry. It seems to us that avenue could have been included in this process to streamline the system and reduce costs to the Department by allowing that entity to participate in the allocation process.

Again, we appreciate the opportunity to address this important topic and would like to reiterate our support for the program. If there is anything we can do to assist you in this effort, please don't hesitate to call on us.

Sincerely,

Eddie Grasser

Eddie Grasser
Region 33 Representative

ALASKA

PROFESSIONAL HUNTER ASSOCIATION, INC.

310 K Street, Suite 200 ~ Anchorage, AK 99501

Phone: (907) 264-6619 ~ (907)-264-6602

Email: office@alaskaprohunter.org ~ www.alaskaprohunter.org

February 28, 2013

Department of Natural Resources
550 W. 7th Ave, Suite 1260
Anchorage, AK 99501-3557

2013 Guide Concession Program Management Framework Written Comments

The Alaska Professional Hunters Association's represents many of the most successful and viable guide businesses in Alaska. What follows are our comments on the most recent proposed DNR Guide Concession Program. These comments are the result of an intensive and exhaustive internal discussion amongst our profession members and they represent a collaborative effort to adapt a viable, foresighted program. The APHA is proud of its efforts to develop and implement this program, while, at the same time, leery of a GCP that ignores or threatens proven, historic guide-business models. Our members, variously, have the full gamut of land use authorizations; Federal, State and private. Many of our members already operate under competitively awarded special use permits administered by the Department of Interior, similar to the proposed GCP. APHA members who operate on private lands enjoy exclusive lease agreements that are outside of the public oversight but are usually directly authorized by a specific native corporation. APHA members who operate on DNR lands and have viable business models have become a minority of our membership while our members that have limited, or sole use concessions (Federal or Private) increasingly enjoy a competitive advantage and are more economically stable, in spite of the more stringent permit stipulations and higher fee structure that they operate under. It is for these reason, economic stability and incentivizing landowner participation in competitively awarded Big Game Guiding Services that reward the best-qualified service provider, that the APHA strongly supports the further development of a viable GCP.

The recently released Guide Concession Program Management Framework by the DNR is close to being a viable and successful program for Alaska's historic guide industry to thrive within. Good examples of constructive changes in the recent offering are the lowered fee structures, the ability to apply for 3 GUAs and the number of assistant guides in "full concessions" being raised to 6. We still feel there is more work to be done on these issues as well as others. The APHA has attempted to prioritize its requests and we ask the DNR respond accordingly. Our comments have been well vetted during two group teleconferences (45 members commenting) and then re-affirmed and organized by our Board of Directors. We hope that the DNR is receptive to our comments and views them as constructive, stewardship based, inputs to promote and maintain this programs'

ALASKA

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short and long term potential. We hope the DNR recognizes that our comments will enhance stewardship and help accomplish the core rational of the GCP to provide a sustainable future for Alaskan guide businesses and minimize user conflicts in the field. Our comments, if accepted, will help the DNR fairly rank and score applicants while setting reasonable parameters for implementation, oversight, and remuneration to the State. It also bears mentioning that, as the GCP becomes more acceptable to Alaska's Professional Hunters it becomes more likely to pass public muster, at large. The APHA humbly request that the DNR carefully consider and implement each and every comment that we put forward and understand that we have listed our priorities in order of importance.

1. Guide or Industry Rep on the Scoring Panel:

The most important question that the GCP attempts to answer is: "who is the most qualified guide for any given area?" This is handled through a competitive scoring, ranking and award process. This is especially important in the first GCP offering when many guides who have operated on DNR lands exclusively are suddenly subject to a prospectus offering. Many of these long standing operators are the most qualified in a given GUA but may be the least experienced in writing a prospectus, due to the simple, over the counter, land use authorization the DNR currently has in place. We understand applicants will be scored on criteria set out by the DNR and the highest-ranking applicant will get the concession in question. We feel strongly that to avoid "injustice" and accomplish the basic goal of getting the most qualified guide in each area, a person knowledgeable about the guide industry, preferably a former guide, be included on the ranking panel. This industry expert will assist service employees in sorting through applicants, with an eye to the practical. We feel there may be "guide culture" specific terms in these applications that service employees will be unable to discern or correctly ascertain. This "expert" input will give a much needed "interpretive" aspect to prospectus ranking as well as a realistic control on what is practically feasible in a proposed "plan of operations." We feel that this "expert" should be disqualified from ever holding a DNR concession and should be paid, on a contract basis by the DNR and subject to standard ethical disclosures and constraints. Our goal is that this person or persons, assist the panels in getting the most qualified guide for any given area but that does not mean that they have to actually rank applicants. They can be strictly advisors but every panel and every application should have this oversight. We feel that this will be crucial to preventing legal questions and will ultimately reinforce the legitimacy of the competitive selection process. Along these same lines, we would like each panel to have the ability to call applicants to clarify any and all aspects of their proposed offerings. Applications should not be viewed as a test, but an objective effort to get the most qualified, ethical, steward of Alaska's resources!

ALASKA

PROFESSIONAL HUNTER ASSOCIATION, INC.

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2. Violations:

The DNR GCP application addresses violations, citations, and convictions on "Form D" of the application package. That section references the loss points for offenses, including disqualification if 100 points are lost, with no definition of how many points can be lost for what types of violations, citations, or convictions. In developing that correlation between lost points and the relative seriousness of the offense, it is important that this be a joint effort between DNR, BGCSB, Public Safety, and the Guiding Industry. There should also be an opportunity for review of any proposed system for lost points prior to its implementation. The point system needs to be fair and clearly defined, with points lost in keeping with the seriousness of the offense, and with a limited amount of discretion left to the review board or whoever is going to review Form D.

We believe strongly that any strict liability violation, with a penalty of \$200 or less should not be a consideration in any guide concession permit application. This type of violation is analogous to a parking ticket, with no consideration given to intent, and with no opportunity for a jury trial. To be fair, only offenses at the misdemeanor level and up should be considered in reviewing guide concession permit applications.

We also believe that violations, citations, and convictions of employees or clients should not be considerations when reviewing an application unless the offense also resulted in actions against the applicant. Against, we are aware of no other occupation in the State where actions of an employee can impact a professional employer to this degree.

Finally, we believe that intent should weigh heavily in the determination of lost points for violations and citations. In the field "things happen" beyond the personal control of the guide. Although the guide may responsible for what occurs on a hunt, when an unintentional violations takes place, followed by self-reporting of the incident, this should be a significant consideration when deducting points from an application.

3. Financial:

We can live with the \$1000.00 annual fee for limited concessions and \$2000.00 annual fee for the full concessions, but feel a \$500.00 credit allowance should be included towards an LAS for limited concessions and a \$1000.00 credit allowance towards an LAS for a full concession.

We are concerned that DNR does not have the authority to "sell animals" by implementing an animal fee. We feel day use fees are a better idea and will be more defensible, because then you are paying for land use instead of selling animals. Also it

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would be easy to calculate because the information could come straight off the hunt records. We didn't think the guide required vs non guide required is a fair calculation, because sheep, moose and interior grizzly hunts sell for similar prices.

Option 1: We think a flat \$30.00 - \$35.00 fee per client day is the best and most defensible, however we know some will be concerned that it is not fair to pay the same price for deer hunts as for coastal brown bear.

Option 2: We also considered a scale of:

- \$20.00 per client day for deer, wolf, black bear and caribou hunts.
- \$30.00 per client day for goat, moose and brown/grizzly bears in units other than 8, 9 and 10.
- \$40.00 per client day for Dall sheep.
- \$50.00 per client day for coastal brown bear in units 8, 9 and 10.

Again, the problem we see with this is that it looks like DNR is selling animals instead of land use.

4. Assistant Guides:

Many of our Members feel there should be no restriction to the number of assistant guides that a full concession operation can employ. There are too many varied circumstances in the state to impose such a limitation. DNR has stated that they came up with the number of 6 based on study of historical hunt records. Some current operations already employ more than 6 assistants. Many operations in the current unlimited competition environment on state lands have self-restricted their scope. One of the primary goals of the concession program is to reduce conflicts between guides. This does not at all mean that the total number of assistant guides in the field and the number of hunters they serve needs to be reduced. Such a restriction can only result in the industries inability to fully serve the public and will likely result in a reduction of overall hunter participation. As the concession operations on state land become more robust, to fill the void left by the reduction of contracting guides in a given area, more assistants may be needed than operations have had in recent history. A margin of growth and expansion should be encouraged for the concession holders not restricted. Least is not necessarily best.

This restriction begs answers to several questions:

- What will a guide do in a random draw situation when they are awarded more than six permits?
- Is this any random six at any one time or it the same six assistants within a given week, month, or year?

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- How does the cook, packer, any helper get counted if they also have an assistant license, but are not on contract?
- How does this limit assistant guides who are still in training, but not yet allowed in the field alone with clients?
- How will this restriction be calculated and enforced?

We suggest that the employment of assistants should be held to within the scope of each proposed operations plan. Each operation is different and by prospectus a guide should be able to justify a range of employee numbers they might require.

5. Limited Concessions:

We appreciate the progress that has been made in regards to the Limited Concessions; however we still have some concerns. Primarily our concerns are for areas that have drawing permits. If a specific area only has only a few tags available there is a very real concern that all of the tags could go to the Limited Concessionaire. For this reason we recommend that Limited Concession holders not be allowed to compete for opportunity within any ADF&G drawing permit hunts within the Guide Concession they have been awarded. Remember, the intent of the Limited Concessions is to provide an opportunity for new guides to get a foot in the door. It is less important that the Limited Concession be economically viable and more important that they provide experience for the Concession Holder.

6. Predator Control Areas:

Our recommendation is to allow a maximum number of predator control permits in each guide use area as the number of full concessions allowed, and preferably half that number. We don't want guides who win a concession to be driven out of business by predator control. We would recommend a similar fee structure as for limited concessions. We would envision the same initial requirements be met as with a full or limited concession, but instead of a complex prospectus, we would propose an application deadline of April 1st with a drawing of all applicants shortly thereafter, with an effective date of January 1st of the next year. Other conditions that could be considered specifically for predator control areas are:

- If a concession becomes a predator control area, any previous limit in a concession holders operation plan for that predator control species, should be waived for the current concessionaire(s).
- a lesser application fee, perhaps \$100.00 per application, since we are proposing a drawing award instead of a full blown prospectus.
- Allowing qualified applicants to apply for up to 5 predator control areas and to receive as many as 3.

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- A shorter duration should perhaps be considered for Predator control permits – maybe 3 to 5 years - since they are evaluated fairly often by the department and conditions can change from time to time.
- A client limit of 4-6 per concession for brown and grizzly bears and no limit for black bears or wolves.

APHA recognizes that this program has improved drastically from previous drafts, we appreciate DNR's willingness to work through the Public Comment Process to develop a well vetted Program. Thank you for your consideration of our comments on the Guide Concession Program Management Framework and we look forward to the implementation of this important Program.

Sincerely,

APHA Board of Directors

Sam Rohrer, President
Tony Lee, Vice President
Brad Dennison, Treasurer
Joe Klutsch
Mike Litzen
Wayne Kubat
Sam Fejes
Joe Schuster

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February 2, 2013

Dear Representatives T. Wilson and Costello,

I'm writing you in an effort to answer the question that Rep. Wilson posed to ADF&G Commissioner Campbell at the end of the Dept. overview in H. Finance on 01/30/13. This same question was posed to DNR Commissioner Sullivan, on the same day, in the DNR Finance Subcommittee by Rep. Costello. The question is (paraphrased in its original form to Commissioner Campbell):

"If numbers of game are healthy, then why do we need a **Guide Concession Program**? And if we do, why can't ADF&G administer it? Why DNR?"

Both Commissioners accurately answered this question from their respective departments perspective, however I think you will find it helpful and appropriate if I provide you with some additional background information that supports their answers. I have attempted to provide you some bullet points below that help clarify the "tools" the public has in its "hunting guide oversight box:"

1. **Big Game Commercial Services Board**-professional licensing, investigations, regulatory authority on professional standards, licensing disciplinary actions, assess and collects professional fees.
2. **ADF&G**-asses biological parameters of game and habitat, provides harvestable surplus to BOG, collects hunting/fishing license and tag fees.
3. **BOG**-subject to AK. Statutes for preferential uses, allocates harvestable surplus to public, regulatory authority to adapt seasons & bag limits, can not tell ADF&G how to use its money, does not collect fees, funded by ADF&G
4. **Land Owner**-issues land use permits in-line with its intent or goals (Private, Federal, State), manages liability exposures, collects "trespass" fees.
5. **Public Safety**-enforces State wildlife law, collaborates with land managers (State, Private), assists/recommends BGCSB investigations

I hope you find this information helpful in answering the question that was put forward in committee.

Sincerely,

Thor Stacey

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The real sense of urgency to implement an acceptable GCP is partially captured in the following excerpt from the December 2012 Big Game Commercial Services Board meeting minutes. This is member Spraker's clarification of an earlier statement that he made in the meeting, off record, and is in response to Registered Guide Brian Peterson's testimony thanking the BOG for resisting rash action on proposals to severely restrict non-resident opportunity. Spraker is the Board of Game member on the BGCSB and the newly chosen chair of the BOG. This quote also expresses some of the limitations that frustrate the BOG in regard to the political dimensions of **land use authorizations**.

"Mr. Spraker said he wants to clarify what he said. He said the board of game has been challenged during the last three or four cycles with more and more proposals to change the season date and reduce the number of permits (given to non-residents). He wants to be clear that he thinks the time is coming, because of crowded situations and sheep will be the first one, and the board will have so much testimony from residents with conservation concerns. The guides asked for permits in 13D because they couldn't offer any type of quality hunt. The board will not be forced but challenged. We have a different makeup on the board with new members and a new legal counselor. He hopes the board of game can maintain the use of sound science and conservation and stay out of allocation issues that are political."

The "13D example" is also referenced in a Jun 29th BOG letter to Governor Palin requesting the development of a DNR GCP.

"The Board recently had to deal with a clear example of the necessity for a competitive lease program. As few as six to eight years ago, only six guides offered sheep hunts in a portion of Game Management Unit 13D, south of the Glenn Highway between Palmer and Glennallen. We learned at our March meeting that 38 guides are currently operating in that area. The majority of these guides attended the Board meeting and testified in support of a Department proposal to reduce hunting opportunity by changing the current regulation from unlimited general hunt to a limited-entry drawing permit

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hunt for resident and non-resident hunters. Drawing permit hunts are rarely supported by the guiding industry because they cannot guarantee a client will draw a permit. This area was so heavily over-hunted there were no other options. This Board action may solve the over-hunting in this area but these guides will simply shift to another fully utilized area to take their clients."

This passage fully encapsulates the tragedy of the current situation on State Land:

1. Rising guide numbers contributing to resource depletion
2. BOG action resulting in restrictions on BOTH resident and non-resident hunters
3. Destabilization and loss of business viability for long-term guides in the area that had been "good stewards."
4. Guides shifting to another area, usurping current use and threatening similar BOG actions state-wide

The BOG does not have a mechanism to devise a fair system of encouraging guide stewardship because an UNLIMITED number of guides can operate in any geographical area on State Land. The BGCSB is also limited in its scope of authority. The concerns are described and delineated in this passage from a letter dated December 19, 2009 from the BGCSB to DNR Commissioner Tom Irwin:

"When suspected over harvest occurs by guided hunters, BOG is faced with the challenge of trying to define a regulatory process to limit the amount of impact on wildlife by the guide/outfitter industry. Since the BOG cannot control the number of guide/outfitters, the manner of responding to these concerns is most commonly the development and adoption of a complex set of regulations that limit hunting opportunity for *all* hunters. Changing general hunts to limited entry permit hunts, registration permit hunts or restricting

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the use by establishing controlled use areas are programs used to limit hunter effort. In short, it appears that development of a system limiting the number of guide/outfitters that can operate on State lands, similar in nature to the existing DOI (Department of Interior) program, will effectively address many conservation and hunter opportunity concerns."

This letter goes on to discuss the contentious nature of public committee and planning groups because of their frustrations with the inability to limit the number of guides in a geographic unit. While the APHA is an organization of professional hunting guides, please give some thoughts how these "complex set(s) of regulations" affect resident hunting opportunity and the average Alaskan's ability to enjoy *their* land.

Non-resident license and tag sales account for approx. 80 percent of the fees collected by ADF&G. The guide industry is an integral part of this funding as we provide a safe, professional conduit for the use of these out of state hunters who are unfamiliar with Alaska's wilderness, vast spaces and sometimes dangerous animals. In addition to the fees collected by the department, the guide industry provides *new* dollars to Alaska's economy in, what amounts to, a value added visitor service. But just like any type of resource development or use, commercial hunting needs visionary management to remain sustainable. Resource stewardship, on an individual level, is a one of the most important aspects of that. But ethical, stewardship based, decisions require a regulatory framework that protects and encourages self-restraint. Currently this framework does not, nor can it exist on State land without a concession program. This conundrum is described in this passage from a BOG letter dated January 11, 2008 to DNR Commissioner Irwin:

"It is difficult for the BOG to develop programs that limit hunter effort in a manner that will protect guides who strives to be a good steward of the wildlife resources, the consumer and the industry. These persons also present

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numerous proposals to us asking for regulations that will protect their efforts to be good stewards. Unfortunately, the programs the BOG has developed to address the wildlife conservation concerns have little ability to provide for one service provider over another. The service provider who operates under good stewardship principles finds their industry efforts limited by restrictive regulation and cannot survive. **Thus, the current system disaffects those guides who strive to be good stewards."**

This issues identified above are some of the most important to consider as you consider whether or not the "status quo" is acceptable.

In summary I would urge you to read or have your staff brief you on the [Owsichuk vs. State Decision](#). This decision is what Commissioner Dan Sullivan was referencing in committee as to why the GCP has fallen to DNR to develop and implement. Since that statutory authority already exists, and Alaska's game resources and professional hunters are in peril, please consider our call to action URGENT and NECESSARY.



100 2-25-13

ALASKA LAZERTOURS

To Mr. Eric Feige,

2-22-13

I am a master guide. I have been in the guiding business ever since I got my asst. guide license in 1969!

I am in TOTAL opposition to DNR's Guide Concession Program (G.C.P.)!

Do not listen to APHA. They only have about 125 members. There are about 1339 guides in Alaska. (539 registered-master, 723 asst. guides and 117 Class A guides.)

In my 40+ years, in the guiding industry, we (registered & master guides) have never been able to vote on any law or regulation brought forward by the State or Guide Board!

DNR is way out of line here and retarded!!
The guide board needs to be put under the Sunset Law again!
but that is another subject!

For now please VETO the G.C.P.!

Thank you.

David L. Lazer

Linda Hay

From: jmogen@alaskapremieroutfitters.com
t: Friday, February 22, 2013 10:59 AM
Subject: Rep. Eric Feige
FW: Guide Program (DNR)

-----Original Message-----

From: jmogen@alaskapremieroutfitters.com
Sent: Friday, February 22, 2013 2:56pm
To: Rep.Mia.Costello@akleg.gov
Subject: Guide Program (DNR)

Funding this program will be nothing but a waste of resources. The intent of the GCP is to address the "overcrowding" issues that may happen in only a few Guide Use Area's. Not all areas have this problem and in some cases there is very little hunting pressure in the area. It is becoming more clear that the real intent is to protect the long term stability of Master Guides making sure that their future is secure, this program would do just that. New guides would stand little chance of ever getting an area as they would never gain the experience necessary to become competitive.

It does nothing to address the real problem of overcrowding which is unregulated Transporters, drop off hunting/float trip companies & residents from Anchorage/Wasilla and Fairbanks. These groups can come in anywhere and drop off up to 20 camps in a day. If this program comes into effect these same groups would still have access to the entire State of Alaska and the overcrowding issues would remain the same.

.Also it forces us to take all of our animals out of one area instead of a few animals out of an entire area. I view this program as a disaster for the future of the guiding industry and many other guides share this same view. I believe we can find alternative options to resolve the areas that have become overcrowded.

I have invested everything I have in my business I treat it as a full time job and then some, I am finally at a point were I want to expand to build a lodge I have local guides that depend on me every year for income I have spent countless hours training young guides I spend thousands of dollars supporting the local economy in fuel, barge service, flying, land leases and general labor wages. Now I am suppose to fill out a DNR prospectus and leave everything I have worked for in the fate of a DNR panel that knows nothing about who I am or what I do, as if I am some cheap commodity that can be traded or sold.

On two other occasions this type of program got shut down and I am urging anyone who has the power to stop this program to listen to our voices and support this movement to end the funding for the GCP.

Thank you for your time.

Jason Mogen-Registered guide #1144

AlaskaPremierOutfitters

Box 74

Ekwok,AK 99580

-464-6023

Linda Hay

From: Bill Stevenson <akbill4ever@gmail.com>
t: Wednesday, February 13, 2013 6:22 PM
TO: Rep. Eric Feige
Subject: guide area letter to Eric Feige.docx
Attachments: guide area letter to Eric Feige.docx; ATT00002.txt
Categories: Linda

To: Rep. Eric Feige,

Thank you for taking the time to listen to a few concerns regarding the State Guide Use Area Program.

In my opinion it would be a good move to have a guide area system in place in the State of Alaska on State lands such as the Federal Guiding Program. Common sense tells us this would increase the over all quality of the guiding as an industry.

The catalyst behind the guide area program is over crowding of guides in GMU 13D and GMU 14A in the sheep-hunting arena of the Chugach Mountains. June 22 2007 The first letter to then Governor Palin from Chairman Judkins of the Alaska Board of Game indicated an urgent problem of over crowding of guides in the area of GMU 13D. Governor Palin responded by saying yes she was in agreement and had been contacted by the APHA indicating a need for a guide program not only for unit 13 but other units as well. December 19, 2008 Chairman Johnson of the big Game commercial services board weighs in with support of a guide area program as well due to over crowding of guides.

All the letters posted on the web site as historical documents deal with the over crowding of guides, problems with trash, human waste, fuel and abandoned camps. On January 11, 2008 a letter from BOG Chairman Judkins IN CLOSING mentions AIR TAXI operations. Letter dated December 19, 2008 from BGCSB chairman Johnson has a passing mention of transporters being an issue. Before year 2000 some thing like 6 guides operating in GMU 13D, 2008 the number had increased to 38 operating in 13D.

Of the 38 guides operating in the area at the time only a couple of us had our own aircraft and we for the most part would not use areas that was already over run with other camps, we do have one guide with his own cub that would routinely drop his guided clients on camps with others but for the most part guides with their own aircraft did not go head to head with others, it did happen but not all that often.

When your guiding and you don't have your own aircraft the only way to access the hunting area is to hire Air Taxi operators to provide you

transportation, the Air Taxi operators use certain landing areas, hence the problem with over crowding. The 30+ guides out there for the most part have more than 1 client, some have 10 clients and working out of a camp with other guides that have the same hunting problems; other guides.

The almost silent problem here is the Air Taxi Operators have a ton of resident clients themselves that are hunting the same areas from the same camps. We have one such Operator in this valley that would have as many as 50 residents in the field at one time. Its easy to do when you have 4 super cubs working and a couple Cessna 185s, that is just one. there are more with cubs and Beavers. Regardless of what the paper work says back in Juneau it takes business to keep that fleet moving.

Yes a guide area system would be great to have in place but realize guides are not the entire problem, as very lightly mentioned in the historical documents transporters are a concern, but I feel not understood as how their roll plays out in the big picture. In the areas of unit 13D and unit 14A where the biggest problem played out to get the guide area program started in the first place. We are so close to Anchorage IF a guide area program was in place and the drawing for sheep was discontinued you would have the same problems as before, only with residents and Air Taxis. Same problem, only with the Air Taxi as the common thread or link, I have referred to the Air Taxi as silent problem because they are a huge problem and will not be affected with a guide area program.

In reading the concession permit application, one has to take into consideration the individuals who will be evaluating the results. The biggest concern is how far off track things are getting on some of the topics, it's going to be difficult to deal will facts and impossible to deal with the emotional based issues.

To step back and look at this from a distance you will see several user groups and all have valid places, that's not to say one has a blanket priority over the other in all situations. Basically four user groups, the first is native uses, second is residents, third air taxi and forth guides. The natives use a relatively small area near the villages, residents of the cities use the road system and ATV trails mostly and some have aircraft,

over all residents on their own is not a big conflict. Air taxi and guides are the commercial operators making up the third and fourth of the group, and here lies the problem. Air taxi operators and guides have real money invested and are here to make a living for profit. One normal guide will take 10 to 15 clients most take less and very few take more. The very smallest Air taxi operator takes many more clients than a guide.

Guide area program on state lands is simply limiting the smaller of the two user groups. The nonresident hunters take about 10% of the game but contribute about 80% of the revenues. The guiding program as it is now has many good guides with a few bad apples. As with every profession this will be the case, its called life. If you are going to limit the guides who take care of a large part of the income, like the taxpayers of this country, lets be nice to them. A guided client contributes far more than an unguided client. Over all the much larger Air taxi operators may contribute more than guides but have a much larger footprint and impact, and most of the contribution is to the oil and insurance companies.

In my opinion yes a guide area program is a very worthwhile program but only if it will increase the quality of experience for the guiding industry, with out leaving the door open farther for the air taxi operators.

FORM A

All of #1 is Good but "in the field" needs to be defined better.
#2 this is getting non-guiding issues of emotional questions with little to no use, this is a question from some one who doesn't understand the guiding business.
#3 for instance what does desert mule deer hunting experience in Mexico have to do with peninsula bear hunting? Who is to say what is relevant? Off subject.

FORM B

Mostly nonsense;

1. The state of Alaska has laws that need to be complied with concerning all this. "Wise land stewardship" and "wise wildlife stewardship" is a judgment of emotional state of mind being decided without a requirement of solid resourceful facts, only opinions from a slanted view. The intent of the question is good but it's the terms and conditions set forth by the state is what needs to be addressed and not some panel of emotional drama.
2. b. Very good questions, a few years ago at an APHA meeting the area biologist gave a speech on full curl rams, the most disturbing thing was the biologist and troopers had no idea what was a full curl ram, a legal ram by definition. The question is good but you have only opinions to judge the answers.
3. This is really a loaded question that fish and game can't answer. Again it's from emotional opinion question that would be asked by someone who thinks they know but has no clue. The State has season and bag limits already set. If you did have the answer you have no control over the other users and you have no way of knowing the survival rates from one year to the next.
4. This is a question of opinion, State of Alaska department of fish and game doesn't need these people in their business, that is the Board of Game's business. This is taken care of and has nothing to do with the guiding business. As a guide we have laws to comply with, we are regulated by the BGCSB and game laws are set by BOG.
5. Sub factor-B This does have a place in some areas but not all. For instance is you work out of a native village or around a native person, how you treat the local natives is very important. Having this as a sub-factor and only 5 points is a strong indication that getting along with the natives is not a high priority and shows disrespect. Again people who have no idea of the operating responsibility of guiding in the areas near a native village are setting this up. Huge red flag here!!!
6. Sub factor-C emotional drama, if you attend a meeting counts the same as getting along with the local people.

7. Sub-factor-D for example behind Eureka pass to the north are lots of trails and mining, this area is being used by thousands of people every year, DNR is well aware of the trails there. To award 10 points to tell of well-known conditions is not a place in the guiding application process.

FORM C

1. Good
2. Most of our real world condition are far more extensive than any training you can get in a class room, the condition we deal with each day in the field are things most of the instructors never experience, for instance a EMT instructor from LA could get full points and have never had a bear close at hand. Avoiding an accident with experience is far more important than being a EMT
3. Good.
4. Good
Sub-factor B-- Good
Sub-factor C-- Good
Sub-factor D-- Good

FORM D

All good

Eric,

Thank you for your efforts and interests in understanding the issues, this is a loosely written opinion from the way I see things, I know and understand its all over the board and maybe difficult to follow.

Sincerely,

Bill Stevenson
907-232-8115