

# ALASKA

## PROFESSIONAL HUNTERS ASSOCIATION, INC.

P.O. Box 240971 ~ Anchorage, AK 99524

Phone: (907) 929-0619

Email: [office@alaskaprohunter.org](mailto:office@alaskaprohunter.org) ~ [www.alaskaprohunter.org](http://www.alaskaprohunter.org)

April 11, 2024

Representative Tom McKay  
State Capitol Room 128  
Juneau AK, 99801

RE: Letter of Support for HB396

Dear Representative McKay,

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,

*Dedicated to the conservation of our wildlife resources.*

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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

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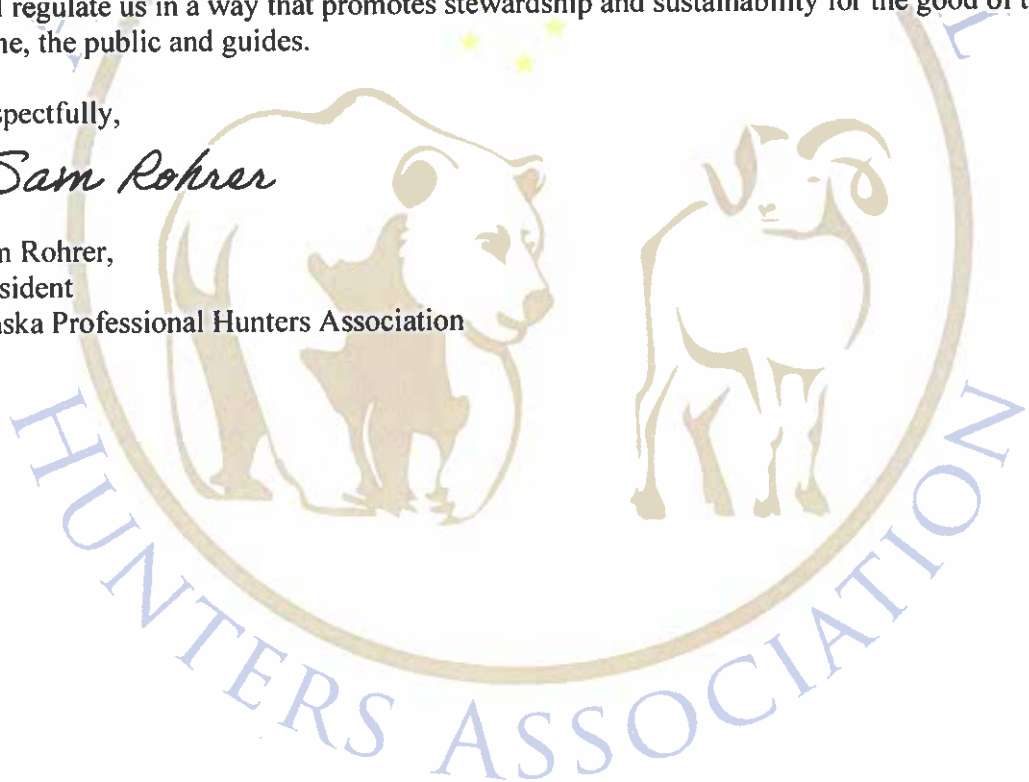
species and then the guides in those areas have the ability to take a limited opportunity and add value to the resource. Limiting guides in an area allows the BOG to reduce nonresident opportunity in a unit while small guide businesses remain viable because they will have a predictable number of hunts.

APHA is deeply thankful for HB396 and we offer 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



*Dedicated to the conservation of our wildlife resources.*



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

April 11, 2024  
Representative Tom McKay  
House Resource Committee  
State Capitol Room 128  
Juneau AK, 9980

Representative McKay,

I'm writing in support of, and to thank you for sponsoring, HB 396.

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

## Azabel Ordaz

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**From:** James Smith <huntersmith54071@msn.com>  
**Sent:** Sunday, April 14, 2024 11:16 AM  
**To:** Rep. Thomas McKay  
**Cc:** Azabel Ordaz  
**Subject:** Letter of support for HB 396

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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 others include: Jake Fletcher, Thor Stacey and Wade Renfro. 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  
Registered Guide # 128878  
You Can't Put A Price Tag On A Good Time.

## Azabel Ordaz

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**From:** Jay H. Stanford <jay.stanford18@gmail.com>  
**Sent:** Sunday, April 14, 2024 5:49 PM  
**To:** Rep. Thomas McKay  
**Cc:** Azabel Ordaz  
**Subject:** Letter of support for HB 396

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Representative McKay,

First off I want to thank you for sponsoring HB 396 (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 HB 396.

Sincerely,

Jay H. Stanford  
Registered Guide 117647  
(907)764-4118

## Azabel Ordaz

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**From:** Mike Zweng <alaskaadventure@live.com>  
**Sent:** Monday, April 15, 2024 4:47 AM  
**To:** Rep. Thomas McKay; Azabel Ordaz  
**Subject:** Fw: Letter of support for HB 396

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Representative McKay ,

I am writing this letter to say thank you, and express my full support of HB 396 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 HB 396 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  
810-278-7379

## Azabel Ordaz

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**From:** House Resources  
**Sent:** Tuesday, April 23, 2024 9:20 AM  
**To:** Azabel Ordaz  
**Subject:** FW: HB 396

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**From:** Susan A <susanallmeroth@gmail.com>  
**Sent:** Monday, April 22, 2024 10:31 PM  
**To:** House Resources <House.Resources@akleg.gov>  
**Subject:** HB 396

I am writing to express my strong opposition to House Bill 396, titled “DNR Big Game Guide Permit Program.” While I recognize the importance of wildlife management and conservation, I believe this bill has significant implications that warrant reconsideration.

### Reasons for Opposition:

**Potential Impact on Local Guides:** HB 396 may disproportionately affect local guides and small businesses that rely on big game guiding services. Restricting access to concession areas could hinder their livelihoods and economic contributions.

**Complexity of Implementation:** The establishment of a big game guide concession area permit program introduces administrative complexities. Ensuring fair allocation of permits and managing competing interests will be challenging.

**Balancing Conservation and Access:** While wildlife conservation is crucial, we must strike a balance between protecting natural resources and allowing responsible access for hunters and guides.

### Appeal:

I urge you to engage with stakeholders, including local guides, conservationists, and outdoor enthusiasts, to refine HB 396. Let us create legislation that preserves Alaska’s wilderness while supporting sustainable outdoor recreation and economic opportunities.

Thank you for your attention to this matter, and I trust that you will consider the diverse perspectives on wildlife management as we move forward.

Susan Allmeroth  
Two Rivers

## Azabel Ordaz

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**From:** Kurt Whitehead <kurtpowguide@gmail.com>  
**Sent:** Tuesday, April 23, 2024 8:18 AM  
**To:** Azabel Ordaz  
**Cc:** Rep. Thomas McKay  
**Subject:** HB396

Representative Tom McKay,

Please vote YES on HB396. The guide concessions bill is very important for the long term sustainability of our resources and for the guide industry.

The hunting guide industry had been a proponent of this legislation since I started guiding in 1997.

This will improve our industry by decreasing conflicts, creating stability, lessen the competition among guides and resident hunters and decrease pressure on the resource.

Please vote yes on HB396.

Thank you very much.

Kurt Whitehead  
Klawock, AK  
907.738.5000



Dear Representative McKay:

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.

A handwritten signature in blue ink that reads "Kevin J. Kehoe". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kevin J Kehoe, President  
Alaska Wild Sheep Foundation  
(907) 441-6323  
[kevinkehoe@alaskan.com](mailto:kevinkehoe@alaskan.com)



**SCI Alaska Chapter**  
**Eagle River, Alaska 99577**  
**Cell (907) 903-8329 Tel: (907) 980-9018**  
[www.aksafariclub.org](http://www.aksafariclub.org)

April 12, 2024

Alaska Legislature  
State Capitol  
Juneau, AK 99811-0001

Re: SCI-AK Support for a Guide Concession Program on State Land.

Honorable members of the House Resources Committee,

The Safari Club International Alaska Chapter supports House Bill 396 DNR BIG GAME GUIDE PERMIT PROGRAM and its senate companion, 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."

HB 396/SB 253 are 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 these bills 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. HB 396/SB 253 take 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. The bills 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 applaud the sponsors 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 the bills and fully support the legislation.

Thank you for your consideration.

*John Sturgeon*

**SCI Alaska Chapter President**

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

## Azabel Ordaz

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**From:** House Resources  
**Sent:** Thursday, April 18, 2024 10:42 AM  
**To:** Azabel Ordaz  
**Subject:** FW: HB 396 House Resources Committee

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** LIO Tok <Lio.Tok@akleg.gov>  
**Sent:** Thursday, April 18, 2024 10:17 AM  
**To:** House Resources <House.Resources@akleg.gov>  
**Cc:** wisemanwolf@gmail.com  
**Subject:** FW: HB 396 House Resources Committee

Forwarding on behalf of Jake Reakoff.

### **Rochelle Grgyb**

Tok Legislative Information Officer  
907-883-5020

*-The Tok LIO does not endorse or oppose any views.-*

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**From:** Jack Reakoff <[wisemanwolf@gmail.com](mailto:wisemanwolf@gmail.com)>  
**Sent:** Wednesday, April 17, 2024 8:51 AM  
**To:** LIO Tok <[Lio.Tok@akleg.gov](mailto:Lio.Tok@akleg.gov)>  
**Subject:** HB 396 House Resources Committee

Hello Tok LIO,

I want to send the following comment of support to be filed with the House Resources Committee regarding HB 396. There is a hearing today at 1:00 PM. I do not see how to get into the teleconferencing. This is my comment:

My name is Jack Reakoff, Thank you members of the House Resources Committee for the opportunity to make comments on HB 396, as I have also regarding companion Senate bill SB 253.

The current guiding situation for the last 25 years on DNR and BLM Lands has been in need of limiting the number of guides in problem areas, especially in areas associated to road systems with access for large numbers resident hunters.

The current failed unlimited guide participation system is not in the best interest of the Alaskan public, Alaska resident hunters, the hunting guides, or the game resources of Alaska.

Therefore, it is imperative to move a House Bill 396 version forward to address this problem.

I am very familiar with this issue. I live in Wiseman Village, one of these problem areas located in Central Brooks Range associated to the Dalton Highway. The make up of the land is predominantly DNR and BLM Lands in game management units 24A, 25A, and 26B. Both agencies use the open unlimited access guide area system administered by the state.

I am a lifelong Alaskan 66 years old. I've lived in Brooks Range and participated in guiding in this area with my dad from the time I was 13 years old. My dad held guide use areas issued by the state previous to their elimination in 1988. I held a registered guide license, but stopped guiding when guiding competition flooded in. Unlimited guiding promotes poor ethics among guides, resident hunter displacement, and resource over use. There is no incentive for competitive guides to conserve game resources.

I have always been a subsistence hunter, trapper, and fisher. 99% of the meat protein we use is from fish and wildlife.

For the last 30 years, I have been a member of the Koyukuk river in Advisory Committee, and am current chairman. I have been a member of the western interior regional advisory council for 31 years, and I'm current chairman. And I am very familiar with the Alaska fish and game management process.

I have listened to the last two senate resource committee, hearings regarding SB 253 as well as public comments

The positive aspects of this bill and its final form should address these issues and to meet legal mandates:

1. Developing a selection process to score applicants that have demonstrated adherence to guide ethics regulations. Applicants that have game violations, instructed clients to take sub-legal animals, or employed unqualified, assistant guides who I have taken sub legal game, or other violations, or have client complaints for unethical conduct, should be scored low and eliminated from obtaining a guide use area on DNR and BLM Lands.
2. Guides who have demonstrated they possess the quality standards to hold a state guide concession permit should be scored high and pooled. Preference for guides who are Alaska Resident should be considered. If there are more than one of these quality applicants, they should be randomly drawn to hold a permit. Lottery drawings are used nationwide for wildlife allocation to limit participation. State guide use area permits should only be issued for five years. Longer permitting time frames would not allow adequate evaluation of the permit holders current progress.
3. Issuance of a Guide use permit should be only on merit, and not through a monetary purchase system. A highly qualified ethical guide, who is poor, should have equal opportunity to obtain a guide use area on DNR and BLM land.
4. If a Guide, who holds a use permit that can not continue to utilize the area, due to health, death, or other reasons, should have the area reassigned to the next highest pooled quality applicant who wishes to participate, or if more than one guide is in the pool they would again participate in the lottery to be drawn for the area. I do not feel that guides that receive a DNR guide use permit should be able to sell the right to another guide.

Thank you for your consideration of these comments, sincerely,

Jack Reakoff

Wiseman, Alaska

Jack Reakoff  
Wiseman, Alaska

## Azabel Ordaz

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**From:** Paul Johnson <gull.cove@hotmail.com>  
**Sent:** Wednesday, April 17, 2024 5:05 PM  
**To:** Azabel Ordaz  
**Subject:** Guide concession Bill.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good afternoon, short and brief comment. This bill has to pass!!!! Way way over due! Thank you. Happy to answer any questions, I know you heard lots of reasons why! My very best. Paul Johnson. Thanks