



STATE OF ALASKA
DEPARTMENT OF
COMMERCE
COMMUNITY AND
ECONOMIC DEVELOPMENT

Division of Corporations, Business and Professional Licensing

Sean Parnell, Governor
Emil Notti, Commissioner
Lynne Smith, Director

December 19, 2009

Commissioner Tom Irwin
Department of Natural Resources
550 West 7th Avenue, Suite 1400
Anchorage, AK 99501

Re: Support to establish a program limiting the amount of guide/outfitter activity that occurs on State lands.

Dear Commissioner Irwin;

The Big Game Commercial Services Board (BGCSB) is very supportive of your efforts and public process to implement this important and much needed program. BGCSB is responsible for developing regulations that provide the framework for guide/outfitter activities, ethics and to protect Alaska's wildlife resources. Alaska's professional hunting guide/outfitter industry has been an integral part of State history and economy by providing professional assistance to many visiting hunters from around the world who choose to hunt in Alaska. Alaska's extreme climate, terrain, vast wilderness, waterways, certain big game animals and logistical challenges pose serious levels of danger to visiting sportsmen and women who are often not prepared for these endeavors. Non residents hunters attracted to Alaska by professional guide services also support wildlife management. Non residents contribute more than 80 percent of the fees collected from licenses and tags sales in our state. Thus, the professional guide/outfitter industry provides a necessary service.

Although the purpose of this letter is to voice our support for the guide/outfitter regulatory process, the BGCSB continually receives negative testimony related to high activity levels by transporters and air taxi operators. Concerns over these operations will continue to intensify, especially in the more subsistence dependent areas of the state.

Additionally, the Board of Game representative on the BGCSB reported that the Board of Game (BOG) continues to receive numerous proposals that come before them asking to limit the impact on game populations by guided hunters, as well as numerous proposals requesting ways to limit the number of guide/outfitters that operate on State lands. As a result of these proposals, BOG and Department of Fish and Game's Wildlife Conservation Division have had to spend a significant amount of time and effort creating complex regulatory oversight and subsequent programs to address this concern.

Department of Interior (DOI) National Park Service, U.S. Fish and Wildlife Service and the U.S. Forest Service agencies in Alaska recognized in 1988 the potential for failure of stewardship due to loss of the former guide area system and took action to address this concern. The result was the co-operative development between the guide industry and DOI of a system that effectively restricts guided hunt activity within certain DOI lands. It is important to understand that once the development of an area system was established on DOI lands, BOG had few proposals brought before them with issues or concerns dealing with guide/outfitter use on these Federal lands.

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 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 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 program, will effectively address many conservations and hunter opportunity concerns.

Responding to these situations the F&G Wildlife Conservation Division has had to establish several, costly public planning committees. Committees were facilitated in rural communities attempting to find balance regarding these situations. The planning committees commonly are filled with a contentious atmosphere brought on by the inability to limit the amount of guide/outfitter activity that occurs on State lands.

Additionally, BGCSB has heard numerous testimonies from the public reflecting instances of poor land and water resource conservation generated by guide/outfitters and their clients on State lands. Complaints are generally related to solid waste, human waste, garbage, fuels and abandoned camps. Since there are limited permitting requirements to keep track of who is operating on these lands, it is difficult to determine who the guilty parties were.

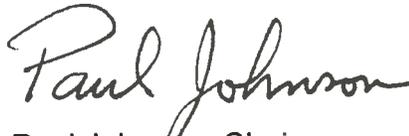
The lack of an effective program to limit the number of guide/outfitters on State lands makes enforcement of existing regulations difficult, since there is no effective method to keep track of which guides are operating where and when. Limited enforcement staff and extremely large regions allow for heightened abuse opportunity for guide/outfitters that seek to operate outside of the law. An area system defining who is authorized, when and where, would provide the Alaska Wildlife Trooper Division a much improved opportunity to enforce wildlife conservation regulations, public safety and industry oversight.

In Closing:

The Big Game Commercial Services Board strongly supports the public process and development of an area system limiting the number of guide/outfitters who can operate on State lands. Furthermore, it should be not only developed with a land management theme but should also include provisions for wildlife conservation oversight from Department of Fish and Game. We are also supportive of a well defined conservation plan (by species) requiring guide/outfitters to anticipate their level of annual harvest commensurate with local population status and health. Our concern is that the potential exists for a guide/outfitter to harvest at higher than acceptable levels in the last few years of his/her lease.

We wish you well in this important endeavor and offer our assistance in whatever manner possible.

Best Regards,

A handwritten signature in black ink that reads "Paul Johnson". The signature is written in a cursive style with a large initial "P".

Paul Johnson, Chairman
Big Game Commercial Services Board

cc: Clark Cox, Natural Resource Mgr.
Dept. of Natural Resources