



unapologetically **FOR ALASKAN RESIDENTS**

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Re: Board of Game Proposal 151

We wanted to make the board aware of some issues that came up regarding proposal 151, which asks the board to close the loophole in nonresident draw permit regulations allowing guides with guide concession areas on federal refuge lands to have their clients completely skip the draw permit process.

5AAC 92.0661(3) – special provisions for brown bear permit drawing hunts – regulations clearly state that the Department “**shall enter** in a guided nonresident drawing, each complete application for a nonresident who will be accompanied by a guide.” It then goes on to state that the Department “**may** enter an application and issue a drawing permit for the general hunt only to a successful nonresident applicant that presents proof at the time of application that the applicant will be accompanied by a guide.”

As shown in our proposal 151 in this advertisement we showed and quoted (**EXCLUSIVE! NO DRAWING KODIAK BROWN BEAR HUNT – GIANTS OF KODIAK ISLAND, ALASKA. SKIP THE PERMIT DRAWING PROCESS AND HUNT THE WORLD’S LARGEST BROWN BEARS!**), guides on Kodiak Island within the Kodiak National Wildlife Refuge are having their nonresident clients completely skip the permit process. We also showed where a nonresident must-be-guided Kodiak draw permit hunt in which the application period was Nov 1 – Dec 15, 2021 was auctioned off by the guide with that concession area in February of 2022.

The “alternate list” within 5AAC 92.061 was intended to be just that, a list of alternates who had applied for a draw permit but were not chosen, so if a client who had won a permit needed to cancel, that hunt could still be awarded to someone else. But that isn’t what is happening. It is crystal clear what is going on; some guides choose to have their clients skip the draw permit application, skip paying application fee, and skip having their name on the public record. This was not the intent of the regulation. The same thing is happening with the Nowitna NWR nonresident must-be-guided draw permit hunt under 5AAC 92.069.

I mentioned in my testimony that these draw permits on federal lands with guide concessions actually go to the guide, not the hunter, to do with what they wish, and that some guides choose to not utilize the permits awarded to them.

Afterward, some guides testified that was not true, that the permits were not awarded to the guide, but at the same time stated that they choose to “take permits off the table” sometimes because they didn’t feel there were enough trophy bears for client satisfaction at that time, or for other reasons.

How can a guide take a permit “off the table” If the permit doesn’t actually go to the guide with that concession area? This is purely semantics; the permits are awarded to a concession area in which that guide has complete control over how to utilize them.

It also came up that the shows where guides advertise and recruit clients are typically in the early months of the year, well ahead of the draw permit application period, somehow alluding that therefore

guides are not able to get clients during the draw permit application period, which is why there is an allowance to skip the draw permit application process.

None of this was intended in the regulations, to allow guides and their clients to skip the draw permit application process. All we are asking in proposal 151 is for guides and their clients to follow the intent of the regulations. In no way do we see, as many guides attested, any harm to guides in following the intent of the regulations, nor does this have anything to do with allocations, as some guides indicated. These permits were never intended to be like Governor tags to bring in increased funding to the Department. It is clear in looking at the draw permit supplement every year at the number of zeros in the applications what is happening. It's just as the advertisement we showed in our proposal, guides are making deals with certain clients that allow them to skip the draw permit process completely, show up on Kodiak and pick up an OTC tag.

This should be fixed, and nonresidents should be required to go through the same draw permit application process as residents.

Thank you for your consideration,

Mark Richards
Executive Director Resident Hunters of Alaska