

## **APPENDIX B – ALTERNATIVES**

The GCP is the course of action that DNR is proposing in order to address the issues brought to our attention. However, there are a number of possible alternatives to the GCP that address some of the problems, each to varying scope and degree. Five alternatives that we considered are beyond the authority of DMLW/DNR and would fall to other agencies or boards to implement. Four of the alternatives considered, including the null, or change nothing alternative, fall under DMLW authority and are evaluations of the different ways in which the GCP could be implemented. These alternatives are not exhaustive but are several of the options that have been identified through public comments and agency discussions.

### **Non DMLW Alternatives to the Proposed GCP**

There are a couple of alternatives that relate to regulating the seasons, bag limits, or permit systems for non-residents. The allocation of wildlife resources is under the authority of the Alaska Board of Game and their regulatory process. The BOG's statutory authority to adopt regulations is given under AS 16.05.255. The regulations they create can be found under 5 AAC Chapters 84, 85, 92 and 99.

The guiding industry must follow wildlife hunting regulations created by the BOG. There are two non-DMLW alternatives that fall under the authorities of BOG.

- The first BOG alternative to the GCP is for the board to further restrict non-resident hunting opportunity. This could be accomplished by expanding the drawing and/or registration permit systems for non-residents, while simultaneously reducing or eliminating non-resident general harvest seasons and bag limits. This alternative would help to address the issues of quality of experience and conflicts between users by decreasing the number of non-resident hunters in the field. It may also address wildlife conservation concerns in cases where overharvest is an issue.
  - The advantages of this alternative include: the regulatory system is already in place and the BOG has the authority to regulate non-resident opportunity. Changes to non-resident hunting opportunity can be implemented piecemeal or statewide to address all scales of issues and concerns. This is the method currently used by ADF&G, the BOG, and the public to address concerns and issues related to non-resident hunting.
  - The disadvantages of this alternative include: changes to non-resident hunting opportunity do not address land stewardship concerns because non-residents are not the responsible party for land use authorizations; this alternative does not address issues involving other user groups such as local residents and the guides themselves; this would have a financially adverse impact to guides and the industry since they could only guide

clients who obtain permits; and finally, this alternative would result in a reduction of revenue to ADF&G from decreased non-resident license and tag sales.

- The second BOG alternative to the GCP is for the board to establish a specific harvest level for non-resident hunters. The BOG would allocate a percentage of the harvestable surplus, such as 10%, to non-residents, potentially statewide and for all species, and the vehicle for this system would likely be drawing permits. This is different than the first alternative in that the allocation to non-residents would be fixed at a percentage of surplus rather than just reducing opportunity as needed.
  - The advantages of this alternative are: again, the regulatory system is already in place and the BOG has the authority to regulate non-resident opportunity. This alternative provides a more predictable allocation of game to non-residents and allows guides to plan more effectively. It simplifies the allocation of wildlife to non-residents and may make it simpler for wildlife managers to plan and set harvest objectives for all users.
  - The disadvantages of this alternative include: this limits business opportunities for hunting guides and outfitters as it would reduce overall non-resident hunting opportunity; setting a flat percentage of harvest in a broad area or by species would result in restricting hunting opportunity unnecessarily in areas where wildlife populations are increasing; similar to the first BOG alternative, this alternative does not help encourage land stewardship and also reduces revenue to ADF&G from reduced license and tag sales.

The guiding industry is also regulated through the Big Game Commercial Services Board. It is important to note that the BGCSB statutes (AS 08.54) authorize the board to license and regulate the activities of providers of commercial services to big game hunters. The statutes do not authorize the board to limit the number of licenses issued or limit the number of guides within a Guide Use Area (GUA). However, the board does have authority over the requirements to acquire and maintain a license (AS 08.54.600), over the boundaries of GUAs and some details of use area registration (08.54.750). There are three alternatives that fall under BGCSB authorities.

- The first BGCSB alternative to the GCP is for the board to reduce the number of GUAs a guide could register for. Currently a guide in the state of Alaska can register in three GUAs per year (not including Predator Control Areas). Reducing the number of GUAs a guide can register for could reduce the number of guides in a GUA, which would address the issues of quality of experience and user conflicts. However, like the BOG alternatives, it does not impact any activities related to land stewardship. This alternative also does not address wildlife

conservation concerns as it has no impact on how many clients a guide serves or how many hunts are conducted.

- The advantage of this alternative: the BGCSB has the authority to make this registration change (AS 08.54.750) with minimal additional cost.
  - The disadvantages of this alternative include: it may not reduce the number of guides within a GUA, as guides may choose to focus on the most productive and desirable GUAs, leading to an increase in competition in areas that are already overcrowded; the reduction of areas available to a guide could reduce a guide's ability to have an economically viable business.
- The second BGCSB alternative to the GCP would be to increase the overall number of GUAs by subdividing or reducing the size of existing GUAs. Guides would still be able to register for three areas but would have to choose between more, albeit smaller areas. This alternative could result in fewer conflicts among users by spreading out hunting pressure.
    - The advantage of this alternative include: the BGCSB has the authority to make this change (12 AAC 75.265) with minimal additional costs.
    - The disadvantage of this alternative is: the reduction in the size of a GUA may not reduce competition since there would be no limit on the total number of guides in one GUA. The most desirable GUAs would still have a high number of guides registered.
- The final BGCSB alternative to the GCP is to greatly increase the mandatory qualifications for obtaining an assistant, registered or master guide license. These may include, but are not limited to, increased years of apprenticeship, adding an exam and/or higher requirements to be an assistant guide, increased qualifications for master and registered guides, demonstrated knowledge of the BGCSB and BOG regulatory processes, demonstrated knowledge of land owner permitting processes, and demonstrated biological knowledge of wildlife. These could all be tested or documented through written, oral, or practical evaluations. Many of these ideas are currently being considered or have been implemented by the BGCSB and could be developed further.
    - The advantages of this alternative include: may increase the quality of the guided hunting experience; may increase guided hunter success; may reduce wildlife and land ownership violations.
    - A disadvantage of this alternative include: increased time required for individuals to develop their business; more time, money and staff would be needed to develop and revamp the big game licensing process

## DMLW Alternatives to the Proposed GCP

There are also proposed GCP alternatives to consider that are within the proposed program framework. These include leaving the existing permit and lease system in place (null alternative), implementing the program only in high conflict areas, a program design that would apply to only specific wildlife species, and changing the current DMLW permitting and leasing process for commercial big game guiding operations.

- The first DMLW alternative (null alternative) to the proposed GCP is to leave the existing DMLW permitting and leasing program as it is. Currently DMLW issues an unlimited number of land use and commercial recreation permits (AS 38.05.850) and leases (AS 38.05.070) to licensed registered and master guides who plan to operate on state land. Land use permits (LUPs) authorize the use of camps in the same location for 6 months to a year on an annual basis and may be issued for up to five years. Commercial Recreation Permits (CRPs) allow guides to establish short term, portable camps on state land for up to 14 days at a time only.

The process for issuing all types of permits is generally a non-competitive process, involves a simple application and review, and fairly minimal fees. Permit stipulations do include terms for land stewardship and are revocable. Commercial operators who do not need to establish a camp and will not overnight on state land must register for Commercial Day Use. Commercial Day Use Registration is required per 11 AAC 96.018 for all commercial recreation purposes on a day-use basis with no camp or facility, whether occupied or unoccupied.

Leases are issued for varying terms, usually at least 10 years, and are designed for more substantial improvements on state land, such as lodges. They are considered to apply to more permanent structures and convey an interest in state land to the lease holder.

- The advantages of the current system are: the program is currently in place; relatively low cost to the average guide; and the process is simple and fair, allowing all guides to conduct their businesses on state lands.
- The disadvantages of the current system are: does not address wildlife management concerns, quality of experience, overcrowding or user conflicts, or enforcement issues.

There have been several comments received that relate to the reported problems of overcrowding and user conflicts. Some comments and reports state that there are numerous instances of conflict that occur in the field, that there are just too many

guides, and that resource depletion and overharvest are problems. However, there are also examples of comments received that state the opposite. It is clear that the severity of the problems is not consistent statewide.

- The second DMLW alternative to the proposed GCP implementation is to only implement the program in areas where overcrowding, resource degradation, and user conflicts are occurring.
  - The advantages of this alternative include: it would reduce the scale and complexity of implementing the GCP statewide, saving time, effort, and money; the scoring system could be designed to be area specific and address the issues and concerns on a finer scale; and finally, it would have a smaller impact on the guiding industry, restricting commercial use and activity only in identified problem areas.
  - The disadvantages of this alternative include: implementing the GCP only in high conflict areas could result in simply creating new problem areas elsewhere when guides, who do not win a concession, move to adjacent areas or units where no restrictions are in place; it may be challenging to identify and quantify the problem areas that should have the GCP in place because there is not clear data documenting conflicts between users, overcrowding, and resource degradation.
- The third DMLW alternative to the proposed GCP is similar to the first but instead of implementing the GCP only in certain areas, this alternative would implement the GCP only for certain wildlife species that have been identified as being at the heart of many conflicts. Many of the comments and reports about overcrowding and resource degradation center around the pursuit and management of Dall sheep and brown bears (in this instance we mean coastal and Kodiak brown bears, not inland grizzlies). Dall sheep and coastal brown bears are highly sought after wildlife species, both to resident and non-resident hunters.
  - The advantages to this alternative include: the program would only be implemented in GUAs where Dall sheep and brown bears are found, not statewide, and this would again decrease the scale and complexity of the GCP; it could prevent the implementation of drawing permit systems in some areas (there is a 2012 proposal before the BOG to implement drawing permits statewide for Dall sheep); and this alternative would only impact those guides who pursue sheep and brown bears and would not have as large of an impact on the whole guiding industry.
  - The disadvantages of this alternative include: the implementation of the GCP for only two species would have little impact on those areas that have user conflicts and overcrowding not related to sheep or bears; a species specific approach does not address land stewardship issues nor

does it address wildlife conservation issues that are not related to sheep or brown bears; focusing the GCP on certain wildlife species only may lead to difficulty with avoiding wildlife allocation issues, which are solely under the authority of the BOG.

- Finally, the last DMLW alternative to the proposed GCP is to change the way DMLW currently regulates our permit system for commercial use of state land by guides. This could be accomplished in several ways: the establishment of buffer zones around LUPs and leases for guide camps; DMLW could limit the number of permits one guide can have or could limit the number of permits issued in an area; DMLW could limit or modify the stipulations for CRPs.
  - The advantages of this alternative include: there would be no need for DMLW to fund and implement a new statewide program; changes to the current system could address the issues of land stewardship, quality of experience, and overcrowding in some areas.
  - One disadvantage of this alternative is that DMLW does not currently have limited enforcement authority on the state lands managed by DMLW and therefore adding more restrictions or stipulations to existing permits may not be effective to address the issues. Other disadvantages of this alternative include: it would be difficult to establish buffer zones in areas where there are already camps in close proximity to one another; buffer zones may spread out the locations of camps but may not affect user conflicts and overcrowding in areas where wildlife are being pursued; not allowing short-term portable camps for LUP authorizations may cause difficulties and unsafe conditions during the pursuit of wildlife; halting the issuance of commercial recreation permits would result in a decrease in revenue to the state; and finally, implementing many of these ideas would still require creating additional regulations.

All of the alternatives to the proposed GCP have the potential to address some of the issues that have been identified. However, the proposed GCP is the preferred alternative for the DMLW because it is the only alternative that can potentially address the majority of the issues and conflicts in an effective manner. The proposed GCP, by introducing a competitive process into the commercial use of land, creates a system where guides and their businesses get rewarded for being good stewards of the land, the wildlife, and for providing a safe and quality service to their clients.