

# Testimony in Support of LD 2054

## An Act to Clarify the Laws Regarding Moose Hunting Permits for Hunting Outfitters

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Senator Baldacci, Representative Roberts and members of the committee:

Thank you for the opportunity to submit testimony for the record in support of LD 2054

My name is **Mark Donaghy**, and I'm a current **Master Maine Guide**, previous owner of an outfitting service in Maine, recent non-resident to Maine and member of SAM. I am not submitting testimony today over the past and current, controversy in the Lodge Tag program. That's for the residents of Maine, IFW and the Outfitters to decide.

I am submitting testimony for the **25k non-residents** who applied to the moose lottery last year, a near record number! This number of **non-residents** represents a major contribution in funds to the State of Maine and the **Economy**. Current statute allocates moose permits at no more than **8% to non-residents**, no more than **2% to Lodges** and the remainder **90% to residents**. At face value, that's what most **non-residents** assume how all the permits for **each WMD and season** are allocated. A number that is consistent with many **non-resident** lotteries across the country.

**However**, sadly that has not been the case since implementing the Lodge Tag Program. Under **Title 12 § 11154 “Subsection 14 Permits for hunting Lodges-E**. Permits allocated under this subsection may not exceed **10%** of total permits issued per year for each season, sex and wildlife management district permit type.” This is the fine print that **No non-residents** research before or read, when deciding to apply. **IFW’s** own language on the moose permit page website is **misleading** to this clause. Essentially, making **non-residents** permits **null and void** with a **0%** chance in many of the WMD’s/season offering

**Bull** permits. Many of **non-residents** have applied unknowingly, for only the WMD's/season that offer **ZERO non-resident** permits with the **Lodge** tags consuming them all before the lottery. These are considered the top trophy permits in the State and offer some of the highest success rate. It should be **IFW's stance** to research these applications and issue **Refunds** to those applicants! Your application process allowed this, allows unlimited chances to be purchased and per the moose permit site...encourages purchasing multiple chances to **Increase** odds. There was no odds for these WMD's.

To gather some insight on how **non-residents** apply and their decision-making process in application, I've conducted a recent poll on the Maine Moose hunting Facebook page.

## Results

- **92% assume permits are allocated at 8% to non-residents, 2% Lodge**
- **55% responded they would NOT apply if less than 8% of permits were issued to non-residents per WMD/per season.**
- **Only 34% apply accepting a Cow permit**
- **17% only apply for September Bull permit**
- **1.5 % applied unknowingly to only September WMD's that issued ZERO non-resident permits for several years now!**

The current level of 2% Lodge permits is based on total permits including **COW** permits. Including the **adaptive cow permits, 82 Lodge** permits were issued in 2025 at a rate of **1.99%**. **Without** including the adaptive hunt, 2025 **Lodge** permits were issued at a rate of **2.3%**. In the history of the **Lodge** permits, **Zero** permits have been issued for a **COW** permit! This **2%** value should be solely based on the total number of **Bull** permits only, coinciding with how **Lodge** permits are purchased.

## Closing

**LD 2054** is a chance for **IFW** to fix some of the loopholes in the Lodge tags, fix how they have misled the **76% of non-residents** who apply for only **Bull** permits in the lottery and give all the guides/outfitters a chance at the revenue these **non-residents** bring to the State of Maine. Not just the select few, who figured out the loopholes in the **Lodge Tags**. This is a chance to **KEEP** record amounts of **revenue** and **non-resident** applicants in the lottery. A large proportion of these applicants would likely leave, if **Bull** permits aren't issued at 8% going forward and it becomes public knowledge.

- **Change so mandatory 8% non-resident permits are issued in each WMD/season/sex**

- **Cap total number of Lodge permits at 2% per WMD/season/sex (this language fixes all the issues with non-resident permits)**
- **Base 2% lodge permits on only the total number of BULL permits offered**

I would like to thank you for your time and consideration

#### Appendix A 2025 Lodge Tags vs Non-Residents

WMD	WMD	2025		INPUT	Oct 13-18		INPUT
		Sept 22-27			Sept Bull	Oct Bull	
		NonRes	Lodge		Total	NonRes	Lodge
1	1	7	15	225	22	0	225
2	2	15	2	175	17	0	175
3	3	1	9	100	9	1	100
4	4	7	13	200	20	0	200
5	5	0	12	125	12	0	125
6	6	1	9	100	10	0	100
7	7 & 13	0	0	0	9	5	140
8	8	0	0	0	17	3	200
9	9	0	0	0	12	0	125
10	10	0	3	30	3	0	30
11	11	0	2	25	1	1	25
12	12 & 15	0	0	0	4	0	40
13		0	0	0	0	0	0
14	14 & 17	0	0	0	3	1	40
15		0	0	0	0	0	0
16	16	0	0	0	0	0	0
17		0	0	0	0	0	0
18	18	1	1	20	2	0	20
19	19	0	3	30	3	0	30
20	20	0	0	0	0	0	0
21	21	0	0	0	0	0	0
22	22	0	0	0	0	0	0
23	23	0	0	0	0	0	0
24	24	0	0	0	0	0	0
25	25	0	0	0	0	0	0
26	26	0	0	0	0	0	0
27	27 & 28	0	2	20	2	0	20
28		0	0	0	0	0	0
29	29	0	0	0	0	0	0
30	30	0	0	0	0	0	0
Total		32	71	1050	146	11	1595

## Appendix B 2024 Lodge Tags vs Non-Residents

WMD	combined	NonRes			Lodge			Total		
		NonRes	LSB	SBT	NonRes	LOB	OBT	NonRes	Lodge	Total
WMD	WMD	NSB	LSB	SBT	NonRes	LOB	OBT	NonRes	Lodge	Total
1	1	6	16	225	22		225			
2	2	13	4	175	17		175			
3	3	2	8	100	10		100			
4	4	9	11	200	19	1	200			
5	5	0	12	125	11	1	125			
6	6	0	10	100	10		100			
7	7 & 13	0		0	8	6	140			
8	8	0		0	19	1	200			
9	9	0		0	12		125			
10	10	0	3	30	3		30			
11	11	0	2	25	1	1	25			
12	12 & 15	0		0	4		40			
13		0		0	0		0			
14	14 & 17	0		0	4		40			
15		0		0	0		0			
16	16	0		0	0		0			
17		0		0	0		0			
18	18	0	2	20	2		20			
19	19	0	3	30	2	1	30			
20	20	0		0	0		0			
21	21	0		0	0		0			
22	22	0		0	0		0			
23	23	0		0	0		0			
24	24	0		0	0		0			
25	25	0		0	0		0			
26	26	0		0	0		0			
27	27 & 28	1	1	20	2		20			
28		0		0	0		0			
29	29	0		0	0		0			
30	30	0		0	0		0			
Total		31	72	1050	146	11	1595			

## Appendix C 2023 Lodge Tag vs Non-Resident

WMD	2023		INPUT	Oct 9-14		INPUT
	Sept 25-30			Sept Bull	Oct Bull	
	NonRes	Lodge	Total	NonRes	Lodge	Total
WMD	NSB	LSB	SBT	NOB	LOB	OBT
1	4	18	225	22	0	225
2	9	8	175	17	0	175
3	5	5	100	10	0	100
4	9	11	200	20	0	200
5	0	12	125	11	1	125
6	1	9	100	10	0	100
7	0	0	0	9	5	140
8	0	0	0	19	1	200
9	0	0	0	11	1	125
10	0	3	30	3	0	30
11	0	2	25	1	1	25
12	0	0	0	4	0	40
13	0	0	0	0	0	0
14	0	0	0	4	0	40
15	0	0	0	0	0	0
16	0	0	0	0	0	0
17	0	0	0	0	0	0
18	0	2	20	2	0	20
19	0	4	31	3	0	30
20	0	0	0	0	0	0
21	0	0	0	0	0	0
22	0	0	0	0	0	0
23	0	0	0	0	0	0
24	0	0	0	0	0	0
25	0	0	0	0	0	0
26	0	0	0	0	0	0
27	2	0	20	2	0	20
28	0	0	0	0	0	0
29	0	0	0	0	0	0
30	0	0	0	0	0	0
Total	30	74	1051	148	9	1595

## Appendix D 2022 Lodge Tag vs Non-Resident

Sept 26-Oct 1			INPUT	Oct 10-15			INPUT
WMD	Sept Bull		Sept Bull	Oct Bull		Oct Bull	
	NonRes	Lodge	Total	NonRes	Lodge	Total	
WMD	NSB	LSB	SBT	NOB	LOB	OBT	
1	6	16	225	22	0	225	
2	10	7	175	17	0	175	
3	3	7	100	10	0	100	
4	6	14	200	20	0	200	
5	0	12	125	12	0	125	
6	4	6	100	9	1	100	
7	0	0	0	7	5	125	
8	0	0	0	18	2	200	
9	0	0	0	12	0	125	
10	0	3	30	3	0	30	
11	0	2	25	2	0	25	
12	0	0	0	2	0	25	
13	0	0	0	1	0	15	
14	0	0	0	3	0	30	
15	0	0	0	0	0	0	
16	0	0	0	0	0	0	
17	0	0	0	1	0	10	
18	0	2	20	2	0	20	
19	0	3	30	3	0	30	
20	0	0	0	0	0	0	
21	0	0	0	0	0	0	
22	0	0	0	0	0	0	
23	0	0	0	0	0	0	
24	0	0	0	0	0	0	
25	0	0	0	0	0	0	
26	0	0	0	0	0	0	
27	2	0	20	2	0	20	
28	0	0	0	0	0	0	
29	0	0	0	0	0	0	
30	0	0	0	0	0	0	
Total	31	72	1050	146	8	1580	

