

# **Testimony neither for or against LD 2054**

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

**Christopher M. Richards**

**Owner 274 Northwoods Guides**

Senator Baldacci, Representative Roberts, and members of the Committee:

Thank you for the opportunity to testify today neither for or against LD 2054.

My name is Christopher Richards, owner of 274 Northwoods Guides and a very proud and dedicated moose hunting guide. Outside of my guiding time I am someone who is known to work extensively and voluntarily towards the preservation of our outdoor traditions and guiding heritage through my extensive involvement in a number of outdoor organizations.

I submit testimony today on LD 2054 with 3 key items I wish to address and thank the committee for taking the time to consider my feedback. LD 2054 currently only has two small items that I will offer my thoughts on; however I also have suggestions that I must insist that the committee review and consult with the Maine Department of Inland Fisheries and Wildlife along with other key organizations with serious and long standing concerns with this program to address the major issues the lodge tag program currently has.

- 1.) This bill currently has language related to not allowing for the deferring of moose permits issued as a part of the lodge tag bill. I agree with what is likely the sentiment of this suggestion; which would be to eliminate this as a pathway to manipulate the program which is a concerning practice that currently takes place. However I strongly feel there should be flexibility within the law to defer a permit in the case of a major medical emergency or a significant family event. The birth of a child or a potential major family catastrophe should be considered as appropriate deferral items and I strongly feel the vast majority of outdoor folks would agree with this statement.
- 2.) I strongly agree with the change to make it explicitly prohibited for a lodge tag sub permittee position to be sold.
- 3.) I would like to now highlight the following concerns with the program and offer some key suggestions that I believe would bring meaningful change.

What on its face was launched as an amazing piece of legislation, with a wonderful “spirit”, has become one of the most disruptive outdoor pieces of legislation this state has ever seen. The program's structure is painfully lacking and needs to have barriers put in place to bring some sense of reasonableness to what should be major concerns for all of us. I want it to be clear I

believe in this program and want to see it sustain for decades to come. This bill was introduced under the context of the immense loss of the northern Maine deer herd, following the early 2000s winters as a piece of emergency economic legislation. The idea being that historic sporting lodges in northern Maine that had seen nearly all of their deer hunting business disappear could, through a lottery system, could get a tag out of their facility to sell as a high dollar over the counter experience as a major economic investment in these facilities that are so essential to our heritage as a people and as a state.

In addition, I believe this program is wonderful in that it is the only big game hunting program in Maine which actually requires the employment of Maine guides. While certainly many hunters hire guides for their moose hunting experience, there is no actual requirement or law to do so outside of this program.

So what is the program?

The requirements for getting a permit are to have a sporting camp and recreation license. Once you have that you can apply for a permit- IN ANY ZONE IN THE STATE. That's right- in order to be eligible you need a facility, you are supposed to have a certified kitchen, you need to have a number of items and pass inspections- however you can take a permit 300 miles away and run an outpost hunt and cook tailgate meals. Is that actually a true "lodge tag hunt"? Why do you need all these facilities or licenses or state inspections to get a tag but you don't need to use those actual things to deliver the experience? Was the intention of this bill for a lodge in southern Maine where there are no moose hunts to get a tag for zone 1? I don't believe that is the case.

**Solution- leverage the rule making feedback on September seasons to expand the September seasons for western Maine zones and then after its implementation enact adjacency regulations that a lodge can only get a permit in the WMD their lodge exists or in an adjacent zone to where their lodge exists.**

Was the intention for lodges to apply, only to get a tag and then transfer it to another outfitter? Some lodges have been able to acquire upwards to as many as 20-25% of the total tags in a given year for only one operation through inter-lodge transfers. While on the surface this may seem harmless as every party is being paid so what is the real harm in that sort of transaction? But I challenge us to consider this in the context of this presence of demand from a select few lodges and outfitters is incentivizing a level of interest in this program that is increasing the number of applicants and risks displacing true historic northern Maine lodges, that this program was created for. This is occurring because a lodge over 200 miles away is getting the tag nowhere near the actual zone their facility exists in; with the only intention they have being to resell it to another outfitter for a quick buck and to walk away from it.

**Solution- implement adjacency for the issuing of permits and make it clear a moose permit may not be transferred to another outfitter and must be sold and the hunt conducted out of the facility in which the lodge tag was issued.**

My final concern is the reality of how the lodge tag program selects winners. The lodges fill out essentially the same general application that all hunters do. However, they submit their applications in December and get the results in January/Early February, meaning they get to pick off the top of the pile with no competition and essentially get whatever they want for a permit. This means up to 100% of the non-resident tags in a given zone in a given week could be gone before the actual lottery. 2% of the TOTAL permits (cow and bull permits combined) are allocated to the lodge tag program and ALL the tags come out of the non-resident portion. I know this was never an intended item and this needs immediate and urgent attention as I'm concerned about this reality not just for our moose hunt but for our reputation as a state from a recreational standpoint.

**SOLUTION- Put in place a 50% cap; meaning that the number of non-resident tags in any given WMD within any given moose season can never exceed more than 50% of the total non-resident tags for that given season.**

The lodge tag program is an amazing piece of legislation that ensures the sustainability of some of our most important outdoor heritage and cultural entities. There is no reason it can not co-exist with the rest of the guiding and outdoor industry- but it can only do so with meaningful change. The program's weight on the non-resident tag group is far beyond its intention and it is drifting from the reason it was implemented. I urge the committee to consider these concerns as major, widespread and needing addressing and urge them to make amendments to the program with input from the Department of Inland Fisheries & Wildlife who has heard the concerns since this program's beginning so we can move forward in a productive and constructive way for all hunters and for all guides.

I am happy to offer thoughts, suggestions or support the committee in any way and urge them to contact me if they feel it is necessary to implement urgent and meaningful change.

Thank you for your time.

Sincerely,

Christopher M. Richards