

Form Name:
Submission Time:

May 2021 RAC Feedback
May 5, 2021 8:32 am

Which best describes your position Somewhat agree
regarding the 2021 Waterfowl
Management Area and crane
recommendations?

Do you have any additional comments about these recommendations?

Utah Waterfowl Association
To Preserve Utah's Waterfowl, Waterfowl Habitat and Waterfowling Heritage

May 3, 2021

?The Utah Waterfowl Association submits the following comments regarding the regulation of commercial guiding on Utah's waterfowl management areas. Regulation is needed as there has been a recent proliferation of commercial guiding, mostly on the Great Salt Lake, that is damaging the public hunting opportunity for which the WMAs were created. While some guides operate very professional businesses, we are concerned that the lack of regulation fosters (a) a profusion of guides that place excessive pressure on the resource, (b) the practical exclusion of the average hunter, and (c) unfortunately, room for unscrupulous operators. While we recognize that any regulatory framework will require future modification based on experience and data, action is necessary now.

?With the foregoing in mind, we propose that the following be included in the regulations: (We use the word "guide" as a catch-all to include any person or company that transports hunters to or through WMAs for commercial gain regardless whether the guide remains physically with the hunter during the hunt.)

1. Guided hunters may not hunt within the boundaries of WMAs. Guides may only transport hunters from WMA launches or through WMAs.
2. The number of guides, boat trips, and hunters utilizing WMAs should be limited.
3. The guide must keep a record of the number of boat trips, hunters, and birds harvested and report this information to the DWR.
4. Boats utilized by guides and the clubs referred to in #7 below must have a prominent registration number.
5. Restrictions on use of parking lots to avoid overcrowding.
6. Safety and insurance requirements.
7. Entities that act like guides, such as commercial clubs that primarily provide transportation services to and through WMAs, should be subject to the same boat trip and use/harvest reporting requirements and restrictions as guides. As an exception, a club that has been in existence continuously for more than 40 years can transport its members and non-paying guests within or through the Willard Spur WMA but is otherwise subject to all registration and reporting requirements.
8. These rules and a complaint process should be publicized so that all hunters are aware of the DWR's efforts.
9. These rules should be issued by the DWR rather than asking each manager to create his or her own set of rules.

In addition, we are concerned that the rapid increase in guiding has placed excessive pressure on certain populations of waterfowl such as greenwing teal. We encourage the DWR to utilize the data obtained from the foregoing regulations to assess whether this is the case. Such a study could play a role in managing this resource that is enjoyed and valued by so many of the state's waterfowlers.

Thank you for considering our comments.

Which best describes your position regarding the 2021 Waterfowl Management Area and crane recommendations?

Strongly disagree

Do you have any additional comments about these recommendations?

I am an avid hunter here in Utah and over the years have spent thousands and thousands of dollars on hunting permits, gear, firearms, archery equipment, ammunition, fishing gear, and other items that have directly benefited wildlife conservation through taxes, fees, etc. I have participated in the dedicated hunter program, which requires 32 hours of community service that directly benefits the wildlife habitats here in Utah. All this to say that I am dedicated to our lands, our animals, and the sustainability and perpetual success of hunters and anglers and I am proud to do my part.

I recently got into waterfowl hunting. And quite honestly, it would have been impossible without the assistance of a guide. Hunting in some of our WMAs requires a significant amount of equipment which is simply an impossible barrier to entry for most people. With the help of a guide, people without the financial resources can still enjoy our wilderness resources. Limiting guiding, even if requiring permits, will significantly reduce the availability to these resources and that's not good for Utah.

Utah has world class duck hunting. People literally fly in from all over the world to hunt in Utah. Ramsey Russell, one of the most world-renown duck hunters, came to Utah 2 years ago and hunted multiple WMAs with the use of a guide and then raved about it on social media and podcasts. He would have been completely unable to hunt this area without one. Last year, my father flew out from Illinois to come hunt on a guided WMA hunt. The following day, our guide had hunters come in from Georgia.

Simply put: If you limit guiding, specifically on WMAs, you severely hurt Utah business, tourism, hunting license sales, etc. It is a domino affect. This is not what Utah needs.

Please do not implement restrictions or permit requirements for Utah's WMAs.

Which best describes your position regarding the 2021 Waterfowl Management Area and crane recommendations?

Strongly disagree

Do you have any additional comments about these recommendations?

I think that guides should be allowed to use WMA property. They are taking public hunters out so banning them from using WMA land is in a way banning public hunters. My daughter and I hunted Swans with a guide on WMA property. It was a fantastic trip and such a great experience to set over a big decoy spread. There is no way that a guy like me could justify the expense of such a setup when we only hunt swans every few years. reputable guides provide a great service for those people that are not full time waterfowlers.

Please do not vote for HB295

Form Name:
Submission Time:

May 2021 RAC Feedback
May 7, 2021 10:54 pm

Which best describes your position Strongly disagree
regarding the 2021 Waterfowl
Management Area and crane
recommendations?

Do you have any additional comments about these recommendations?

Dear Wildlife Board and/or RAC member,

As an avid waterfowl hunter I am deeply concerned about the proposal from the DWR regarding the use of Waterfowl Management Areas (WMA's). Please bear with me I have many thoughts on the subject and will try to express them all.

Let me start with my background so that you know where I am coming from. I am not a commercial hunting guide (I don't take folks out waterfowl hunting for a living), but because I do take friends and acquaintances out and by legal definition as written in Utah Code 58-79-102 there are times that I could be considered a hunting guide or outfitter, because someone that I took hunting paid for fuel for the truck or boat and it exceeded the \$100 dollar amount. On one occasion I have even been given cheese and maple syrup from Wisconsin by a hunter from Wisconsin that I met through social media. I didn't take him out for compensation but at the end of the day he offered and it would have been impolite not to accept his gift. I have hunted the marshes of Utah for over 40 years almost exclusively on our public WMA's. I have introduced countless people to the sport, some of which I still hunt with to this day. I am not a casual hunter that might get out once or twice, or even a handful of times. Depending on the year I may be in the marsh 30-50 days a season. Last season was 40+ days. I have walked, biked, used a canoe, a kayak, a mud boat, an airboat (not my own, I wish). I share this information to help you get a sense how many potential encounters I have in regards to the concern with guides and guiding on our WMA's. I have never had a negative encounter with someone guiding. I am not naïve enough to think that just because I haven't had a bad encounter doesn't mean they don't happen but rather they might not be as prevalent as they are being made out to be. The reality is that we don't actually have any hard data.

It seems that we are reacting to an issue that is isolated to a few specific locations with a few guides at a few times during the season. Rather than propose regulation that addresses those specific issues we get a proposal to ban guiding on all WMA's. Why not regulations specific to those problem areas. HB 295 states that guiding is not allowed without a permit and then we turn around and say "sorry no permits". Seems rather underhanded. Let's not forget that the hunters being taken into the marshes by the guides are "public hunters" with as much right to use the marsh as any other hunter. They have just chosen to pay someone to take them out. Blair states in his presentation that only 13% support guiding, but what you don't was the reaction to the survey on social media. Many of those that expressed opposition to guiding did not realize that guiding is currently allowed. They feared that we would get an influx of new users on the WMA's (any duck hunters nightmare). Because so many didn't realize we already have guides using the areas it signals to me that they are not as big of an impact as we are being lead to believe. What happened to the other data. Blair also states that roughly 1% of the land area in the state is wetland and that opportunities for the public to use it is why the WMA's were created. If we exclude the hunters that guides are taking out from using the WMA's where are they supposed to go. The assumption here is that guiding is forcing the public hunter from being able to use the areas

and that is not true. More hunters is actually making it more crowded, not the fact that some of the hunters have hired a guide. Even a guided hunter is still a "public hunter" on public land.

In regards to the use of the WMA for swan hunting guides. We are being told that the guides are using an area day after day after day and that it is impacting the habitat, the wildlife and the infrastructure. What doesn't get said is that if the guides were not there other hunters would still be there having the same affect, because that is where the swans want to be. Let's put the swan hunt into perspective, 2750 permits, with very small percentage of those utilizing a guide to fill the permit. If the regulation goes into effect it will essentially mean "no swan guiding in Utah" because most of the swans are harvested on our WMA's or Bear River Bird refuge that doesn't allow commercial guides. The loss of public hunting opportunity that keeps getting brought up is no different than any other spot. If I want it I need to get there before someone else, guide or not. Many times I have had to set up in a different spot than I intended because someone else got there first. That is the nature of hunting public land.

Blair also mentions liability for unlicensed and uninsured guides. My response is then we need to enforce the law that we already have that requires them to get licensed and insured rather than prohibit guiding. What would I propose? Start by continuing to allow guiding with the intent to gather actual data. Require them to register and report information such as dates, numbers of people, harvest data, place used, etc. Then we will know how much use we are getting on the WMA, where the use is, the extent, and then we can make better recommendations based on that data. If we start by excluding guides then we will not be able to gather that data. We may find that in the future we need to exclude guiding in some or all of these areas but it will then be based on real data not just based on what someone thinks is going on. Another suggestion that I heard was to make sure those that are guiding are clearly identified. Not sure how we would do that but it could be a good idea.

All this from someone that doesn't guide commercially and had one of the best seasons of my life last year. We saw more waterfowl more consistently and in more areas then we ever have. Our waterfowl managers are doing such an awesome job with the WMA's, let's keep them open to all "public hunters", even those that need to pay someone to help them get into the birds.

Thanks you for your time. Feel free to contact me if you need any clarification on any of the ideas or thoughts.

Ja Eggett

Form Name:
Submission Time:

May 2021 RAC Feedback
May 13, 2021 9:27 am

Which best describes your position Strongly agree
regarding the 2021 Waterfowl
Management Area and crane
recommendations?

Do you have any additional comments about these recommendations?

The Utah Waterfowl Association, which counts thousands of waterfowlers among its members, submits the following comments regarding the regulation of commercial guiding on Utah's waterfowl management areas. Regulation is needed as there has been a recent proliferation of commercial guiding, mostly on the Great Salt Lake, that is damaging the public hunting opportunity for which the WMAs were created. While some guides operate very professional businesses, we are concerned that the lack of regulation fosters (a) a profusion of guides that place excessive pressure on the resource, (b) the practical exclusion of the average hunter, and (c) unfortunately, room for unscrupulous operators. While we recognize that any regulatory framework will require future modification based on experience and data, action is necessary now.

With the foregoing in mind, we propose that the following be included in the regulations: (We use the word "guide" as a catch-all to include any person or company that transports hunters to or through WMAs for commercial gain regardless whether the guide remains physically with the hunter during the hunt.)

1. Guided hunters may not hunt within the boundaries of WMAs. Guides may only transport hunters from WMA launches or through WMAs.
2. The number of guides, boat trips, and hunters utilizing WMAs should be limited.
3. The guide must keep a record of the number of boat trips, hunters, and birds harvested and report this information to the DWR.
4. Boats utilized by guides and the clubs referred to in #7 below must have a prominent registration number.
5. Restrictions on use of parking lots to avoid overcrowding.
6. Safety and insurance requirements.
7. Entities that act like guides, such as commercial clubs that primarily provide transportation services to and through WMAs, should be subject to the same boat trip and use/harvest reporting requirements and restrictions as guides. As an exception, a club that has been in existence continuously for more than 40 years can transport its members and non-paying guests within or through the Willard Spur WMA but is otherwise subject to all registration and reporting requirements.
8. These rules and a complaint process should be publicized so that all hunters are aware of the DWR's efforts.
9. These rules should be issued by the DWR rather than asking each manager to create his or her own set of rules.

In addition, we are concerned that the rapid increase in guiding has placed excessive pressure on certain populations of waterfowl such as greenwing teal. We encourage the DWR to utilize the data obtained from the foregoing regulations to assess whether this is the case. Such a study could play a role in managing this resource that is enjoyed and valued by so many of the state's waterfowlers.

Thank you for considering our comments.

Utah Waterfowl Association
