



**Which best describes your position regarding the proposed changes to the conservation and sportsman permits rule?**

Strongly agree

**Do you have any comments about the proposed changes to the conservation and sportsman permits rule?**

This comment is not specifically related to this proposal, but I am not sure where to submit. Anyway, has the DWR ever considered allowing hunters to roll their once-in-a-lifetime points to a different species? Like maybe giving hunters a one-time chance to do that, and possibly charging them a cash fee plus a points fee (maybe 10% of their points?). With how long it takes to draw these tags now, I'm sure some hunters have changing circumstances or desires that would lead them to prefer a different species now than the one they originally chose 20+ years ago. But under the current system, it's tough to give up all of those points that have been accruing for years only to start at 0 if you change species, so I imagine very few hunters ever change after making their initial selection. So it could be nice to give hunters an one time option to roll points to a new species, but also a chance to raise revenue for the DWR and cut some points from the system through a points fee.



**Which best describes your position regarding the proposed Sevier/Piute Big Game Winter Range WMAs Habitat Management Plan?**

Strongly disagree

**Do you have any comments about the proposed Habitat Management Plan?**

I'm writing to respectfully urge you to exclude Causey Reservoir from the new Wildlife Management Area (WMA) access license requirement. While I understand the need to fund conservation and maintenance of Utah's WMAs, applying this rule to Causey is not reasonable or equitable for the public. Causey is a beloved recreation area that draws hundreds of visitors each summer day-many coming simply to paddleboard, kayak, swim, or hike. The vast majority of these visitors are not hunting or fishing and have never been required to purchase a license just to enjoy outdoor recreation on public land. By requiring a hunting or fishing license for every adult visitor-regardless of their activity-you place an unnecessary financial and bureaucratic burden on families, tourists, and casual outdoor enthusiasts who simply want to enjoy time in nature. This could discourage public use of a natural resource that belongs to all of us. This policy also risks disproportionately impacting lower-income families who may not be able to justify the added cost of a license just to paddleboard or hike a few times during the summer. I strongly urge you to carve out an exemption for Causey Reservoir, or at least for visitors not engaged in hunting or fishing activities. This is a public recreation area that should remain free and accessible to all.

Which best describes your position regarding the new license requirements to enter WMAs?

Strongly disagree

Do you have any comments about the new license requirements?

As a birder, I do not want to purchase a consumptive license. I take nothing. I'm willing to contribute to WMA upkeep through a "wildlife watchers" license. The bird rest area at the entrance to Farmington Bay is huge for birders and should be exempt.

**Which best describes your position regarding the new license requirements to enter WMAs?**

Somewhat disagree

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**Do you have any comments about the new license requirements?**

I do not think I should be required to purchase a consumptive license as a wildlife watching citizen. I do support and would purchase a wildlife viewing pass if that were an option. Providing such an option would also provide useful data on how these lands are used by various constituent groups.

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**Which best describes your position regarding the proposed changes to the Dedicated Hunter Program?**

Strongly disagree

**Do you have any comments about the proposed changes to the Dedicated Hunter Program?**

Causey has way more non motorized boating and paddling than fishing. Why should kayakers a paddle board users have to buy a fishing license?  
It's a ridiculous money grab by the state.





**Which best describes your position regarding the new license requirements to enter WMAs?**

Strongly disagree

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**Do you have any comments about the new license requirements?**

As someone that doesn't do much hunting or fishing, but does enjoy viewing wildlife in these area, I think it is preposterous that I should have to buy a hunting or fishing license to access these lands when I plan to do neither. I don't make a ton of money, and this will limit my opportunities to enjoy Utah's greatest asset - its outdoors! Please do not pass this law.

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**Which best describes your position regarding the new license requirements to enter WMAs?**

Somewhat disagree

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**Do you have any comments about the new license requirements?**

I already pay for and hold an annual pass to access American Fork Canyon and highway 92 which includes the trailheads and access to the trail systems on Timpanogos. Will this pass cover the new DWR pass requirements? If not, would I need to purchase both passes? That seems excessive and a financial burden to myself and others who use those areas.

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**Which best describes your position regarding the new license requirements to enter WMAs?**

Strongly disagree

**Do you have any comments about the new license requirements?**

You are using this to preclude people from enjoying these areas. People should not have to pay money for more taxes to gain access to these areas. This is a money grab by the state pure and simple.

**Which best describes your position regarding the new license requirements to enter WMAs?**

Strongly disagree

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**Do you have any comments about the new license requirements?**

This disgusting and an affront to what it means to live in Utah. This does not represent the will of the People, and those responsible have no place here. My family should not be required to have permits for things we don't do, to simply walk in the King's forest. Shame on all of you. You've taken your control too far. This is absolutely disgusting. Look at yourselves. This is un-American. Our children would watch nature behind fences because of people like you. Land free for all of history and mankind, ripped away from humanity for your profits. Shame on you.

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**Which best describes your position regarding the new license requirements to enter WMAs?**

Strongly agree

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**Do you have any comments about the new license requirements?**

I agree with the license requirements as all users should contribute to costs, BUT the idea for a non-hunter/fishman to purchase a license when they don't hunt is off-putting. The license should be name as an "access pass" or some other terminology, other than "license". You're having non-consumptive users buy a license that they would never participate in. Just call in a "usage pass" or "WMA Access Pass". It will be easier for them to accept.

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Which best describes your position regarding the proposed outfitters, guides and spotters rule?

Strongly agree

Do you have any comments about the proposed outfitters, guides and spotters rule?

how about regulating how many outfitters can be in a unit. we drew mt dutton a few years back and the guides and outfitters were on every ridge. also at 1 point shooting over are heads . it took 15 years to draw they ruined are hunt.

**Which best describes your position regarding the new license requirements to enter WMAs?**

Somewhat disagree

**Do you have any comments about the new license requirements?**

While I can appreciate the change, I don't agree with the legislature requiring a license to access WMAs. There should be an alternative license for wildlife viewing - especially for those of us who do not hunt; those of us that are bird watchers, not hunters, should be able to buy a license that is for fishing or hunting. Also, for those who pay for the state wildlife license plate, that should also allow access to these WMAs.



**Which best describes your position regarding the proposed changes to the Dedicated Hunter Program?**

Somewhat agree

**Which best describes your position regarding the proposed changes to the conservation and sportsman permits rule?**

Neither agree nor disagree

**Which best describes your position regarding the proposed outfitters, guides and spotters rule?**

Neither agree nor disagree

**Do you have any comments about the proposed outfitters, guides and spotters rule?**

BAN ALL GUIDING ON PUBLIC LAND IN UTAH!!!!!! they are a plague, disease and feel extremely entitled to the animals and other natural resources that belong to the public and state of Utah. it's time for them to make a living on private lands or find a new career! private money should not be made from public natural resources. I'd also like to see anyone or "influencer" who uploads a wildlife related video to social media that is monetized, pay a percentage of the annual money made to a conservation or habitat project fund. these people have helped put an incredible strain on Utah's wildlife over the last decade as a result of their "career". they need to pay back into what they are taking from.

**Which best describes your position regarding the CWMU recommendations?**

Strongly disagree

**Do you have any comments about the CWMU recommendations?**

ZERO public land should be allowed to be hunted on a CWMU permit. this land does NOT belong to them; they should not get exclusive hunting rights on it.

**Which best describes your position regarding the new license requirements to enter WMAs?**

Strongly agree

**Do you have any comments about the new license requirements?**

love this! its way beyond time the freeloaders can now help pay for these properties and projects! they should have to purchase a duck stamp to access waterfowl management areas as well!

Form Name: May 2025 RAC Proposals Feedback  
Submission Time: May 14, 2025 2:54 pm

**Which best describes your position regarding the new license requirements to enter WMAs?**

Strongly disagree

**Do you have any comments about the new license requirements?**

Why in the world is the state legislature passing bills about restricting access to WMAs? I can't imagine our representatives are being flooded with calls from constituents voicing their desire for more regulation of our public lands that really aren't "public" anymore with encroachment like this continuing to happen. 90% of the legislators don't seem to hunt, fish, or know much about these things anyways. Did they actually read this bill before voting on it and do they understand what it will mean for them, too? They'll be among the hundreds of citizens ignorantly violating this new law while trying to enjoy a weekend morning hike on the foothills above their home where they've hiked freely their entire lives.

**Which best describes your position regarding the proposed changes to the Dedicated Hunter Program?**

Strongly agree

**Which best describes your position regarding the proposed changes to the conservation and sportsman permits rule?**

Neither agree nor disagree

**Which best describes your position regarding the proposed outfitters, guides and spotters rule?**

Neither agree nor disagree

**Do you have any comments about the proposed outfitters, guides and spotters rule?**

No guide or outfitter should be allowed to operate on public lands.

**Which best describes your position regarding the CWMU recommendations?**

Strongly disagree

**Which best describes your position regarding the new license requirements to enter WMAs?**

Neither agree nor disagree

**Which best describes your position regarding the recommended sage-grouse translocations?**

Neither agree nor disagree

**Which best describes your position regarding the recommended changes to Administrative Rule R657-4?**

Neither agree nor disagree

**Which best describes your position regarding the proposed Sevier/Piute Big Game Winter Range WMAs Habitat Management Plan?**

Neither agree nor disagree

**Which best describes your position regarding the proposed changes to the Dedicated Hunter Program?**

Strongly disagree

**Do you have any comments about the proposed changes to the Dedicated Hunter Program?**

I think this is a program that needs to be done away with

**Which best describes your position regarding the proposed changes to the conservation and sportsman permits rule?**

Strongly agree

**Which best describes your position regarding the proposed outfitters, guides and spotters rule?**

Neither agree nor disagree

**Which best describes your position regarding the CWMU recommendations?**

Strongly disagree

**Do you have any comments about the CWMU recommendations?**

Don't like seeing public land that isn't land locked included in a CWMU. Especially Ingham peak, the trade lands are not near as good as the the land the public would give up

**Which best describes your position regarding the new license requirements to enter WMAs?**

Neither agree nor disagree

**Which best describes your position regarding the recommended sage-grouse translocations?**

Neither agree nor disagree

**Which best describes your position regarding the recommended changes to Administrative Rule R657-4?**

Neither agree nor disagree

**Which best describes your position regarding the proposed Sevier/Piute Big Game Winter Range WMAs Habitat Management Plan?**

Neither agree nor disagree

**Which best describes your position regarding the new license requirements to enter WMAs?**

Strongly disagree

**Do you have any comments about the new license requirements?**

First off I would like to say that the rules, exemption s and boundaries are way too complicated for the general public to comprehend and readily understand. The YouTube video was beyond confusing. Only a lawyer could understand what Chelsea Duke explained. Secondly, I have no desire to visit wma spaces, however some wma's are adjacent to national Forest land. Do the current easements allow the public to pass through a WMA to access adjacent public property and adjoining trails within the National Forest without a fishing license?

**Which best describes your position regarding the proposed changes to the Dedicated Hunter Program?**

Somewhat agree

**Do you have any comments about the proposed changes to the Dedicated Hunter Program?**

This is a great option for those who are 100% positive they'll draw a tag for that year, but it is a bit annoying that hours can't be banked from year to year until the tag is drawn. I don't see why the division wouldn't allow those hours to roll over other than for greed reasons; wanting to get free labor. That part doesn't seem ethical!

**Which best describes your position regarding the proposed changes to the conservation and sportsman permits rule?**

Neither agree nor disagree

**Do you have any comments about the proposed changes to the conservation and sportsman permits rule?**

Once in a lifetime hunts and Antelope Island permits are such an unrealistic goal for average Utahns, any change to this department won't make any difference to our drawing odds.

**Which best describes your position regarding the proposed outfitters, guides and spotters rule?**

Strongly agree

**Do you have any comments about the proposed outfitters, guides and spotters rule?**

I listened to the southern Utah RAC meeting and it's very evident the ones on the Southern Utah RAC board are all tied up with Guides and outfitters in some capacity. They opposed these changes because it's affecting their bottom line. As a citizen and hunter of southern Utah who doesn't utilize outfitters or join the 'Pay to Play' cancer, I totally agree with these changes allowing our DWR to hold outfitters accountable for their actions of harassing the average hunter to get their client "THEIR" animal. The Guides and Outfitters are acting like they are an innocent victim in this change, but they are the cause for the rule change. If they would have been acting responsibly and ethically in the first place, there wouldn't be a problem. They are the Cancer to our sport of conservation, and any further fees or regulation placed on them and their "Trophy Hunting" clients, is more than warranted. It's about time they get restricted for the benefit of the average sportsman! I hope your board can see through their hypocrisy when they come crying to you!

<b>Which best describes your position regarding the CWMU recommendations?</b>	Somewhat disagree
<b>Do you have any comments about the CWMU recommendations?</b>	I struggle to trust that the public will really gain access to what is proposed. Anytime the public give and inch to private industries, they seem to take a mile and the public are left to just accept the fact that they've lost more access. It all looks good on paper, but the implication usually results in more restrictions for the public.
<b>Which best describes your position regarding the new license requirements to enter WMAs?</b>	Strongly agree
<b>Do you have any comments about the new license requirements?</b>	It'll be nice to see others helping toward conservation besides just hunters. Making non-hunters who utilize public lands contribute to the conservation of those lands is great.
<b>Which best describes your position regarding the recommended sage-grouse translocations?</b>	Neither agree nor disagree
<b>Which best describes your position regarding the recommended changes to Administrative Rule R657-4?</b>	Neither agree nor disagree
<b>Which best describes your position regarding the proposed Sevier/Piute Big Game Winter Range WMAs Habitat Management Plan?</b>	Strongly agree



**Which best describes your position regarding the proposed outfitters, guides and spotters rule?**

Strongly agree

**Do you have any comments about the proposed outfitters, guides and spotters rule?**

I listened to the southern Utah RAC meeting and it's very evident the ones on the Southern Utah RAC board are all tied up with Guides and outfitters in some capacity. In the business world it is a conflict of interest in seeing all sides of the playing field. Your normal sportsman that doesn't use guides always takes the brunt of the hunting experience. Over crowded, animals being pushed day in and day out. Its all caused by the guides and outfitters. From the spotters rule: Intentionally obstructing or interfering in someone else's lawful hunt (or attempting to do so). This is a great idea. But no one to enforce it. Guides/outfitters will always have more people in the field, shoot the biggest animals, etc, etc. Make the law of no guides and outfitters in utah..... There is too many grey areas and no enforcement to keep anyone in check. Bring back the days when our public lands were there for your average sportsman to enjoy. Not for someone to gain money off of. These rules are being put in place because guides and outfitters are the problem.....

**Which best describes your position regarding the proposed outfitters, guides and spotters rule?**

Strongly disagree

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**Do you have any comments about the proposed outfitters, guides and spotters rule?**

Dear Wildlife Board Members,

On behalf of the Utah Outfitters and Guides Association (UOGA), we submit this formal letter of opposition to the recent enactment of SB149 and the subsequent implementation of R657-72. These measures transfer licensing authority for Outfitters and Guides (O/G) from the Division of Professional Licensing (DOPL) to the Division of Natural Resources Law Enforcement (DNR-Law), significantly altering the structure and oversight of our profession. We believe these changes carry serious ethical, economic, and legal consequences that necessitate urgent reconsideration.

**1. Economic Burden and Antitrust Concerns**

SB149 and R657-72 impose new financial obligations that disproportionately impact smaller operators, risking market consolidation and reduced public access to guiding services. The Federal Trade Commission (FTC) has cautioned against licensing regimes that raise barriers to entry, citing reduced consumer choice and inflated prices (FTC, 2017).

These economic effects may contravene federal antitrust law under the Sherman Act, 15 U.S.C. § 1, by fostering regulatory environments that favor dominant market actors and reduce fair competition.

**2. Ethical Irregularities and Due Process Violations**

We are particularly alarmed by credible reports that private interests were granted influence during the drafting of R657-72. This issue was brought up in EVERY RAC Meeting. Such actions constitute regulatory capture and undermine public trust in fair governance. The Supreme Court, in *Citizens to Preserve Overton Park v.*

*Volpe*, 401 U.S. 402 (1971), warned against administrative decisions shaped by undue private influence.

Moreover, the reclassification of our licensure in 2020—from a professional license to a trade registration—occurred without adequate stakeholder input, raising constitutional due process concerns as protected by the Fourteenth Amendment and clarified in *Goldberg v. Kelly*, 397 U.S. 254 (1970). This also justifies and provides for the foundation of a Federal Injunction to stop the implementation of this into law and also significant industry-wide damages that have resulted. (Perceptual Image, Monetary Losses, Personal and Industry Assault).

**3. Coerced Funding of Enforcement Mechanisms**

The mandate that outfitters and guides directly finance DNR law enforcement operations is problematic. This structure lacks precedent and raises concerns under the Takings Clause of the

Fifth Amendment, which restricts compelled use of private funds for public administration without just compensation (Koontz v. St. Johns River Water Mgmt. Dist., 570 U.S. 595 (2013)).

This model creates a coercive dynamic where regulated professionals are required to fund their own oversight agency, compromising the neutrality and fairness essential to lawful governance.

#### 4. Environmental Impact and Federal Compliance Issues

An influx of new Certificate of Registration (C.O.R.) holders may pressure federal agencies such as the U.S. Forest Service (USFS) and Bureau of Land Management (BLM) to increase issuance of Special Use Permits. This surge could overwhelm established thresholds under the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321 et seq., and strain land-use plans governed by the Federal Land Policy and Management Act (FLPMA).

Failure to coordinate these changes with federal environmental compliance standards may invite scrutiny from agencies such as the EPA, further complicating our operations on public lands.

#### Conclusion

SB149 and R657-72 represent a departure from transparent, inclusive, and legally sound governance. We respectfully urge the Wildlife Board to halt implementation and convene a comprehensive review, with full participation from affected industry stakeholders.

The Utah Outfitters and Guides Association stands ready to collaborate in a constructive process that protects public interests while preserving the integrity of the guiding profession in Utah. However, if that cannot occur, then we feel backed into a corner and have limited resources except to take action and seek a Federal Injunction. That is NOT what we want. We hope that this does not just silence a response. We will interpret "no response" as "posturing", in the environment of legal action, and that mediation talks are not extended.

Respectfully submitted,

Tyler Miller

**Which best describes your position regarding the new license requirements to enter WMAs?**

Somewhat disagree

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**Do you have any comments about the new license requirements?** June 2, 2025

Utah Wildlife Board Members,

The Utah Wildlife Federation, an affiliate of the National Wildlife Federation, works to promote the responsible management and sustainable use of our natural resources while advocating for policies that protect and enhance Utah's wildlife and related outdoor recreation activities such as; hunting, fishing and wildlife viewing.

We support the intent of the provision in HB 309 that requires wildlife watchers to contribute, along with hunters and anglers, toward the cost of managing our wildlife management areas along the Wasatch Front. However, we feel the requirement to purchase a hunting or fishing license by those who have no plans to hunt or fish sends the wrong message to those who access WMAs solely to watch or photograph wildlife.

We recognize that the Wildlife Board has been directed by the legislature to pass a rule that is consistent with the legislation, so we expect the requirement to be incorporated into administrative rule. With that being said, we encourage the DWR to work with the bill's sponsor to create a WMA Access/Conservation Permit that non-hunters and non-anglers could purchase (residents and nonresidents) to enjoy their watchable wildlife activities on our WMAs.

The user-pay system is appropriate, but there's a way to set it up so everyone feels that how they choose to appreciate wildlife is validated by the fee schedule.

Sincerely,

Shauna Hart  
Utah Wildlife Federation, Chairman

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**Which best describes your position regarding the new license requirements to enter WMAs?**

Strongly disagree

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**Do you have any comments about the new license requirements?**

I strongly disagree with the new license requirement to access the Timpanogos WMA. The new rule effectively kills the Bonneville Shoreline Trail in that area. Trail access on public lands is a cornerstone of the Wasatch Front's high quality of life. Restricting access to paying users erodes that cornerstone. Moreover, the Shoreline Trail is one of the most accessible and heavily used urban interface trails in Utah County. I recognize that there are many considerations that go into the management of public lands, but cutting off access to the BST, especially in the foothills above the heavily populated Provo/Orem area, seems a drastic, even punitive response to underfunding or overuse. I implore the DWR to reinstate access to the trail, even if they keep the license requirements for the rest of the area.

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**Which best describes your position regarding the proposed outfitters, guides and spotters rule?**

Strongly disagree

**Do you have any comments about the proposed outfitters, guides and spotters rule?**

I have been a guide since 2021, and was, prior to the legislative change, licensed through 2026. I have zero wildlife infractions or issues in my guiding career or personal hunting experiences. First, the term spotter should be removed. Spotters are not paid in our outfit and many others. They are there to learn how to guide providing the outfitter the opportunity to vet them without having a negative effect on a paid clients hunt/experience. Furthermore, non-guided hunters in the general public, especially those with Limited Entry or Once in a Lifetime tags are allowed to enlist unlimited help from friends and family on the mountain to aid in "taking" an animal. Second, regarding the implementation timelines that were opposed by this legislation, there should be a grandfather clause for the 2025 fall/winter hunting season that allows for current DOPL approved guides/outfitters to continue operations as previously authorized to do so. Many hunts are booked years in advance for some and these changes do not afford the opportunity for long-term bookings while we wait to see if an outfitter is approved a COR. Third, costs for applying for a COR should not exceed current DOPL costs. Adding costs to cover administrative expenses related to a self-induced program ownership transfer is not the fault of outfitters or guides. Why are you not charging trail riding, fishing, or nature guides/outfitters who operate on federal/state land within Utah? This entire process has circumvented the public opinion by being tacked on to a last minute "midnight" bill when the original bill was strongly opposed by lobbyists and other representatives. Representative Shipp has stated/admitted that the language in this legislation is not perfect and probably requires an amendment or revision. If that is the case, let's postpone enforcement until we get the language right. The wildlife board should publicly recognize the Outfitter and Guides Association, listen to their concerns/feedback prior to enforcing a legislation change that was designed to specifically target a specific group of people without due process.

**Which best describes your position regarding the proposed outfitters, guides and spotters rule?**

Strongly disagree

**Do you have any comments about the proposed outfitters, guides and spotters rule?**

There are many issues with this proposed change. First and foremost, it appears to be a broad punishment of an entire group based on the actions of a few individuals. While we wholeheartedly support improvements that benefit our profession and the preservation of wildlife, this change does not achieve those goals. Removing licensure from the state and imposing excessive yearly fees is not a step forward-it's a punitive measure. Are we considered professionals or merely a group subjected to arbitrary rules meant to catch a few bad actors? While there will always be some who disregard the rules, the majority of Guides and Outfitters work diligently to comply with the constantly changing regulations imposed upon us. This effort to "improve" has missed the mark entirely, starting with the fact that it was imposed from the top down without adequate input from those directly affected. Why is feedback being sought only after the change has already been implemented? Our frustration stems from the many obvious flaws in this rule. The opposition is not to change itself but to regulations that fail to address the real problems in the Big Game guiding world.



**Which best describes your position regarding the proposed outfitters, guides and spotters rule?**

Strongly disagree

**Do you have any comments about the proposed outfitters, guides and spotters rule?**

As an outfitter in Utah I find this rule a blatant conflict of interest for the DNR/DWR to be involved in giving out Outfitter/Guide licensing/certification. There is no other state in the world that does this. I have been a licensed Outfitter in Colorado as well and they have a State licensing board that works with the Fish and Game. The Fish and Game does not have anything to do with Outfitter licensing. That is my first complaint, the second is the fee increase is absolutely exorbitant. This increase is going to directly effect small business owners pocketbooks negatively. To have to license a non resident guide for a week long hunt \$750 when they are only making \$1500 to guide is not doable. You have to understand that the majority of us outfitters are hunting OTC units and our guests are scraping together all the money they can to pay for a guided hunt. We aren't charging tens of thousands of dollars for these hunts and we aren't hiring guides that we are paying thousands to guide either. There is no way my guides can pay \$750 for a yearly license and so that is going to come directly out of my profit if I want them as a guide. This is a hardship! I wish the State would look at all the other states around us and do this correctly. Set up a state licensing board who actually works with the DNR/DWR who works with the USFS/BLM offices and do this deal right! This legislature is going to push the small business owner/Outfitter out and allow only those charging thousands to continue. What a shame that Utah has become all about the dollar when it comes to hunting. I am a full time outfitter making my living on the back of a horse and this new legislature will absolutely change the way I run my hunts. It may push me out completely or I will have to pass this along to my clients. Please consider this when dealing with this new rule. Thank you for your time.

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**Which best describes your position regarding the proposed outfitters, guides and spotters rule?**

Strongly disagree

**Do you have any comments about the proposed outfitters, guides and spotters rule?**

Utah is getting out of control on the cost to guides and outfitters. We need to stop this BS. It is already hard enough to make money as a guide, and now UT is trying to price out the ones that only do 1 or 2 clients. Since this is going through we need to keep the cost for the license the same as it is now with no increase. DWR needs to concentrate on the deer herds and other game and leave the licensing with DOPL.

**Which best describes your position regarding the new license requirements to enter WMAs?**

Strongly agree

**Do you have any comments about the new license requirements?**

I am commenting on behalf of Wasatch Audubon Society with members in Davis, Weber, Morgn, and Box Elder counties. We often visit WMAs to watch birds and other wildlife, especially Farmington Bay and Ogden Bay. We understand the need for additional funds to maintain these areas, so we're willing to do our part. The annual price of a fishing license is not prohibitive for the majority of our active members, and it makes sense that it's cost effective to use the license system that is already in place. Some already have one of the licenses. However, we'd like credit for our contributions. We ask for a method to indicate when buying the license if it will be used for wildlife-watching. Then data about WMA use and funds won't be based just on the types of licenses purchased.

From watching the video of the Northern RAC meeting, I believe that the license fees will provide federal matching funds, and would like to know more about this to inform our members.

**Which best describes your position regarding the proposed outfitters, guides and spotters rule?**

Strongly disagree

**Do you have any comments about the proposed outfitters, guides and spotters rule?**

Through the fall and winter of 2025, many hunting opportunities are already booked years in advance. The current changes do not allow for long-term planning while outfitters and guides await approval of their certificates of registration. This uncertainty puts our businesses at a significant disadvantage.

We believe that any new administrative costs should not exceed those currently imposed by DOPL. It is unfair to require outfitters, guides, and spotters to shoulder additional expenses that result from program ownership transfers-an issue beyond our control. Furthermore, we question why similar requirements and fees are not being applied to trail riding, fishing, or nature guides and outfitters who operate on federal lands within Utah. We feel this legislation unfairly targets one group without a consistent statewide approach.

The process of enacting these changes has also bypassed meaningful public input. The legislation was attached as a last-minute addition to a bill, despite strong opposition from lobbyists and other representatives. Representative Shipp has acknowledged that the language of the legislation is imperfect and may require amendment or revision. If this is the case, enforcement should be postponed until the language is corrected. We urge the Wildlife Board to publicly recognize the Outfitter and Guide Association and to actively seek our input and concerns before implementing these changes. Legislation should not target a specific group without due process or adequate opportunity for feedback.

Thank you for considering our perspective. We look forward to working together to ensure fair and effective regulation for all.

**Which best describes your position regarding the recommended changes to Administrative Rule R657-4?**

Strongly agree