

Brian Simpson
 P.O. Box 61210
 Fairbanks, AK 99706
 907-322-9841
 Email: noainc@mosquitonet.com

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Board of Game Comments
 P.O. Box 115526
 Juneau, AK 99811-5526
www.boardofgame.adfg.alaska.gov

Proposal #28: OPPOSE

I oppose eliminating the non-resident moose hunts in the subunits of 22D and 22E.

Upon careful consideration given to this proposal I request the BOG **oppose or take no action** on proposal #28, and allow the non-resident RM855 season to continue in **both** subunits.

Overview: Proposal #28 was submitted by the Seward Peninsula Subsistence Regional Advisory Council. Proposal #28 seeks to end all non-resident hunting in subunits 22D and 22E, **and yet:**

During the October 2015 meeting in Nome, the SPSRAC passed **WP16-46 Executive Summary** wherein they requested that the **closure** of moose harvest by non-federally qualified users in subunit 22E be **rescinded**.

Opening federal lands to all users for moose harvest was justified by the SPSRAC due to the “recovery of the moose population in the area”.

The Board of Game has also made regulatory changes, including:

- A) In 2008 for subunit 22E **establishing** a winter season for one antlered bull **January 1 to January 31**. The Board of Game also established a **non-resident registration hunt with** a ten (10) bull quota.
- B) In 2010 the Board of Game adopted WP10-79 changing the harvest limit from one bull to one antlered bull, and **extending** the season from August 1 to December 31 to **August 1 to March 31**.
- C) The SPSRAC unanimously voted to submit a proposal requesting opening federal public lands to all users at its’ February 2011 meeting, **based on the recovery of the moose population**.
- D) The Board of Game in January 2014 extended the resident winter season from January 1 to January 31 to January 1 to March 31 in subunit 22E **in response to an increasing moose population**.

The Nome ADF&G, as quoted through Tony Gorn (information quote years 2010, 2014 and 2015), state management goals for subunit 22E are to increase and stabilize the moose population, moose populations have increased from 504 in 2003 to 701 in 2014, the population is “well above” state management goals, and currently believed to be stable. Gorn reported that recruitment rates in 2014 were at 13%.

Gorn also reported that the moose harvest is under reported in this region, which makes reported data of harvest unreliable. Whatever the actual harvest rate is, the moose population is increasing.

Subunits 22D and E are separated by the continental divide mountain range and it is an observable fact that the moose migrate during the fall (mid-September to mid-October) from the north flowing drainages in subunit 22E to wintering areas in the south flowing drainages of subunit 22D.

Conversely in the spring (mid-April through May) the moose migrate back into the north flowing drainages of subunit 22E for the summer season.

Moose population surveys do not accurately portray the population as the definition of set numbers of moose in both units is not static, and would depend on when the survey is taken.

I personally, and accompanied by many other local residents to the subunits, have witnessed the **increase** of the moose population in these subunits during the past twelve years.

Unlike relying on the ADF&G population surveys, and ADF&G admitted under reporting of harvest by resident hunters, my field observations are ongoing throughout many months and season cycle changes of each and every year since 1993.

I clearly remember, during a previous proposal in the ongoing multi-decade effort by a select few individuals to eliminate non-resident moose hunting in this area, counting more moose in one single wintering yard located in subunit 22D than the Nome ADF&G claimed for the entire subunit. There are witnesses to this event.

The **WP16-46 Executive Summary** was also supported by Kawerak “due to the current data indicating the moose population is healthy and in the rise”.

Aside from **WP16-46 Executive Summary** the Seward Peninsula Subsistence Regional Advisory Council also submitted **WP16-47 Executive Summary** which proposed creating a cow season for subunit 22E.

It is difficult to comprehend the discrepancy in logic and conservation considerations for the SPSRAC to submit proposals to open the area in every way possible to additional moose harvest opportunity due to “a stable and increasing moose population” as recently as October 2015, and then propose eliminating the extremely limited and highly regulated and accurately reported non-resident season in 2016.

Support for continued non-resident harvest: Local residents in the communities of Shishmaref and Brevig Mission have been and continue to be very supportive of the guided non-resident moose hunts in this area. In fact, it would be impossible to have integrated guided hunting based in these communities without the active support of the elders, period.

These village based non-resident guided hunting operations are now 34 years in continuous operation.

The ongoing attempts to eliminate a very limited and highly regulated non-resident moose hunting quota, while at the same time conducting continuing and ongoing efforts to increase the hunting opportunity for moose harvests has been in the interests and efforts of a very small number of individuals.

If there were any conflicts between non-resident and local interests, the BOG

would be flooded with proposals to eliminate non-resident harvest.

And yet each regulatory cycle finds one proposal, supported by faulty or in fact contrarian biological background information aimed at eliminating non-resident opportunity.

Conservation: The non-resident harvest under the RM855 permit system is very limited with a total of three (3) permits for 22D and ten (10) for 22E. The SPSRAC suggests the moose in these units be managed as one population, which reflects the opinion I have raised over many years to the ADF&G and the BOG.

In response to the stable and increase of the overall moose population as cited by the Nome ADF&G and the SPSRAC, and the benefits to local residents in the terms of employment and access to the resource of prime, fat meat, delivered to local households, the total of 13 moose harvested by non-residents does not negatively affect this resource.

Nor does it decrease the opportunity of resident hunters. The issue for resident hunters, both local to the units, or statewide, is the lack of reasonable access due to the remoteness, lack of air access and river access and logistic support in most of these subunits during the early fall season.

Resident hunters who are willing to make the effort and willing to bear the high costs to access these areas can do so. The efforts by a very few individuals to eliminate non-resident harvest of moose is not motivated due to conservation concerns.

Rural Economy: The local economy is extremely depressed, and providing guided services to non-residents has become a dependable and essential source of income to local residents. This includes wages, equipment leases, lodging, groceries, gas, and a market for local handicrafts, fur items and artwork, which helps distribute the economic benefits throughout several communities.

The BOG must consider that eliminating the non-resident moose season will strongly and negatively affect many local residents by the loss of income and many tons of fat, prime condition game meat, harvested when the animals are in their best physical condition and delivered to local families. Many of these families do not have an able bodied hunter, or do not have access to these prime bull moose during the early fall season. Instead, many local families end up with much inferior animals harvested during the late rut or early winter when they are skinny and sub-prime.

Eliminating the moose season will also negatively affect the local residents who have become licensed and experienced to be able to guide non-residents and find seasonal employment in a region which lacks almost any employment opportunity.

Summary: The Seward Peninsula Subsistence Regional Advisory Council has made this proposal using a justification which is the exact opposite of their actions and statements in the preceding years.

Each regulatory cycle the BOG is requested to eliminate the non-resident moose season, with varying themes of the same justification of a decreasing population which is contrary to the actions to increase harvest seasons, extend or implement new cow seasons, or in this cycle to eliminate protections for federally qualified users.

During the past 12 years or more, every regulatory cycle the BOG is faced with one proposal to eliminate non-resident moose hunting in either or both subunits 22(D)

and 22(E). These proposals are never generated by local residents of the specific communities in the region of the subunits.

In fact none of the previous proposals in years gone by, nor the proposal #28 before your consideration currently, represent actual biological, conservation or non-resident, guided hunter conflict with local residents concerns.

Proposal #28 is unique to the proposals over the past years in that the core argument and logic used to justify the elimination of non-resident opportunities, which is a stable and increasing moose population, is the exact opposite of how the facts were used to argue for an increase moose harvest, add a cow season, and remove federally qualified user protections on federal lands.

Sincerely,
Brian Simpson