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Draft Response: Pertaining to RM 842 - RM 853 moose quotas

Tony,

Thank you for your call and Emails concerning your possible management decision to cancel all 10 RM842 non-resident registration permits for GMU 22D Remainder. I share your overall conservation concerns for the health of the moose resources in both units 22D Remainder and 22E as much as anyone affected by hunt closures. The moose are very important to my livelihood, in terms of meeting a large extended family's needs and in the terms of my guiding business.

The sustainable long term health and the ability to utilize this (and all other wildlife resources in these units) has always been of primary importance in our operations planning. We are a somewhat rare and unique guiding operation in that we are intertwined in the local village economy, accepted and well supported.

An RM842 closure decision by ADF&G does not only effect this business but also creates large and negative impacts in the local area, as defined by many residents in the immediate local area, and many more from as far away as the Nome area.

I have researched and quantified the data for the harvest history for these units from both the ADF&G website and my own records and created two spread sheets with this information. The purpose was to quantify and illustrate the level of harvest in relation to moose population trends in these units, and to quantify who is doing the harvesting.

I do not have access to the full fall 2014 harvest data, other than the disposition of harvests for RM842 and RM853 from our operations. Nonetheless, creating a spreadsheet of data illustrates interesting patterns of harvest.

The moose have dramatic seasonal migrations between both units 22D and 22E. As we spend many months during all different months in the year, we have observed these movements first hand. There is a definite mass movement from the east to west, across the continental divide during the spring. This same movement reverses in the fall from the west to east back into unit 22DR.

There are large concentrations of moose within the divide itself, particularly in the fall, wherein the bulls and cows will cross back and forth regularly and can be observed doing this on a daily basis. This makes it difficult to justify closing one side of the divide because it is the same moose population that is defined by an arbitrary line drawn on the map defining two subunits for regulatory purposes.

We have not seen any decline in moose densities, nor a decline in the age structure of mature/older bulls. On the contrary we have seen an increase in mature bulls.

On the data for 22DR I included years prior to the RM842 with such data as I can substantiate to find an average of 5.4 bulls harvested by non-residents in this subunit over the past 13 years. With such small overall numbers the level of harvest is remarkably statistically consistent over a fairly large length of time when comparing the 13 year

average to annual non-resident harvest.

Of the total 5.4 bull annual average harvest by non-resident hunters in 22DR, the annual average of 1.4 moose or approximately 20% is harvested by hunters not associated with our operations. I have always been concerned to the degree some or perhaps many of these hunts are in compliance with Alaska wanton waste, same day airborne and guiding regulations. My concerns are based on personal observations from myself and those associated with our operation.

For example, subsequent to the 9/11 aircraft grounding we were visited by a trooper for a hunt camp field check. The following year, we had a drop camp within a couple miles from us, with non-resident hunters associated with that individual trooper. We were requested to help them to get out from the field due to very poor weather and their lack of pre-trip planning. Our own pilot flew over their general camp area and we spotted a moose carcass left in the field, with just the antlers and one front leg salvaged. The same with a caribou bull. We declined to have anything to do with this party.

We have also observed a four wheeler with a party of both known Nome residents and unknown persons, probably non-residents, hunting and heading west, away from the road system with just moose antlers tied to the ATVs. It is very unusual to travel over rough terrain with antlers when hunting and not shuttling them out of the field. If the antlers are removed before all the edible meat is salvaged, it is a serious offense.

I have also been boasted to by Nome residents of taking non-resident moose hunters into unit 22DR and locating, harvesting bull moose in trade for four wheelers and river boat/outboard combination. This is most likely a violation of the Big Game Commercial Services Board regulations concerning guide/outfitting without a license.

Another disturbing incident was encountering a potential musk ox hunter at the Nome airport who told me he booked with another local Nome "guide" because he was "cheaper", when there were no "other" licensed and registered guide in guide unit 22-02 (22DR). Why would a person willing to act as an unlicensed guide and willing to enter into a commercial service musk ox hunt and not consider the same service for a moose hunt?

These are some examples of why I have a legitimate concern of the strong potential and probability of the abuse of the resources. I would submit that lessening or eliminating activities that are not legal within conservation regulations would result in less moose being harvested by non-residents in 22DR, and this step should be taken before eliminating opportunity to legitimate non-resident hunters and big game service providers.

It has always been my policy not to become involved in meddling with potential incidents that are not connected to my own operation, for which I am legally, ethically and morally responsible for all activities. The only two exceptions to this policy, where illegal incidents that were caused by other persons but had a potential negative spillover to our operations, namely a musk ox wounded (and subsequently died) by an arrow in close proximity to our operations and a large brown bear shot and left, which could have been blamed on us.

I do find it particularly disturbing that legitimate opportunity for legal and ethical hunts to be eliminated due to illegal and unethical activities. Reducing the harvest stemming from illegal activities must come before eliminating legitimate harvest opportunity.

I am also concerned with the department relying heavily on reported harvests from "subsistence" surveys that are not consistently conducted. We both know that there is a certain amount of harvest that is conducted locally but not reported on the green harvest tickets, or for that matter probably there was no 5A hunting license or harvest ticket issued prior to the hunts.

That said, unless these surveys are conducted unit wide and have some degree of consistent structure, it is difficult to place much weight on accuracy to their findings. I am concerned that an inflated number of harvests are credited to these surveys, and again, illegal harvest rates are being guessed at for total numbers and this guess is counted as factual against the minimum opportunity allocated for legal and reported non-resident hunters.

The RM842 hunt authorizes up to 10 bulls per season to be harvested. The actual average seasonal harvest is 5.4 bulls. The department is proposing eliminating ten permits and all non-resident opportunity to achieve a reduction of 5.4 bulls in a unit that has only averaged a 19.6 bull harvest from all hunts. The scale of loss of legitimate opportunity is very disturbing in relation to the minimal degree that this action would lead to any meaningful increase in the bull:cow ratio, or to any meaningful decline in moose density.

This ratio is further diluted statistically from the fact that at least half, if not more, of the bulls harvested under RM842 would also be accurately described as 22E moose. The removal of illegal harvest and quantifying an accurate number of local un-reported harvest would do much more to meet department management goals, protect the resources and continue the essential economic and dietary benefits that these few RM842 moose harvests represent than removing the opportunity.

It is very critical for the department to consider certain unique aspects associated with the majority of the 8.4 bull moose average harvested under the combined authority of RM842 and RM853:

- 1) These bulls are harvested during their annual prime health, weight and fat content. This factor is of critical importance to the local rural population whom are the direct beneficiaries of the resource. Virtually ALL of the meat, fat and organs, are salvaged and transported to the Villages of Shishmaref, Brevig Mission and the city of Nome.
- 2) The fact that the animals are harvested by non-residents, who take the antlers and capes out with them, does not in any way detract from the fact that many local elders and families, who have no means or access to these prized foods at this time of the year, because the larger bulls provide the prized aqutak fat in large quantities. Moose harvested later in the fall and winter have little or no fat and lose a lot of body mass and weight.
- 3) By breaking down the average harvests of moose in these units illustrates the large percentage of resources that should be included in the "subsistence" surveys (namely 5,000 lbs. of prime meat delivered to the local homes). To ignore this fact, and to create management policy based solely on the residence zip code of who harvests the animal versus the residence zip code of who utilizes the animal is faulty and incomplete.
- 4) It is noteworthy that the concept of proxy hunting for individuals who cannot themselves hunt but need the meat from certain animals is popular. In this

particular hunt, the end result of the RM842 is identical to a proxy hunt, in that local people receive the benefit of a highly prized food source that is difficult to obtain during the early fall season.

- 5) In fact, the non-resident harvested meat is far more meaningful to local residents than meat removed to relatively distant Nome, or through illegal activity.
- 6) The hunting operations also provide meaningful and practical economic benefits to many local residents who have few alternate opportunities. The loss of the musk ox hunting operations resulted in the loss of substantial income and resources to local residents. In fact, outside of government jobs and public assistance and the local stores, the guiding economy, now entrenched for 25 years is the single largest private source of income, and the important benefit of the increase in sale of local arts and crafts). This proposed closure will result in destroying much of what is left of this opportunity. We have placed a great deal of effort and resources into training and cultivating local people in this industry, and many have taken advantage of this. In fact, one of the reasons our guided hunts are so popular in these two units is because of the unique and good experiences the non-resident hunters enjoy with their local guides and operations staff.

By graphing the harvest rates over time, it is difficult to quantify increasing pressure from Nome area hunters. The overall harvest remains remarkably static, without an annual increase of general harvest reported kills. There may well be talk of increased interest in the Nome area, and there may well be increased efforts, with varying degrees of legality and competence, but the actual data does not support an actual increase in volume of harvest. I assume that the department is not relying on "subsistence" surveys in Nome to determine harvests by Nome area residents for these subunits.

The department should consider eliminating the October/November season, primarily due to the fact that bulls harvested during the late rut and post rut are of inferior quality and body weight. It would be a better use of the resource to harvest the bulls at their peak health, or later in the winter when they have time to recover and far more palatable. October/November moose are normally the time for trophy, not subsistence hunting.

The RM853 hunt also has up to a 10 bull harvest, with an average of 3 bulls harvested annually during the life of this hunt authorization. This is a minimal average annual harvest and with our operation we will focus on concentrating as much harvest as possible to this unit. I remain concerned for the legality and ethics for the non-resident hunts outside of our operation as the hunts are directly related to activities within RM842. The same concerns apply, particularly concerning potential violations of the BGCSB regulations. The reason for the strict guide/outfitting regulations is to reduce the incidents such as wanton waste, same day airborne, etc.

The current and projected majority of bull harvests occurring under the RM842 and RM853 hunts are in those portions of these units that experience intensive seasonal migration. There is an average of a 42% harvest rate for the

combined 20 permits offered, or a total of 8.4 bulls. It is extremely difficult to understand how eliminating half the opportunity would result in any meaningful gain to the departments goals for this resource in unit 22DR.

I request that the department does not cancel the RM842 at this time. The data and information that would justify this closure is not sufficiently substantiated in relation to the harm done to local residents. The totality of the numbers harvested will not result in harm to the bull:cow ratio or moose density in unit 22DR. Therefore taking no action will not result in actual harm to this particular moose population. Taking steps to collect meaningful, consistent and accurate subsistence surveys, insuring that illegal hunting is not inflating the non-resident harvest and taking steps to encourage reducing predation should proceed before taking such a step.

Our operation will also make it a priority to harvest on the 22E side as much as possible to minimize the 22D harvests, albeit, many of the moose hunted are "dual" residents of both units.

Sincerely,
Brian Simpson

RM842 - 22D remainder	22D R General Season	Total Harvest	Year	RM853 - 22E	22E General Season	Total Harvest
6 of 10 permits	(12)?	(18)?	2014	6 of 10 permits	(12)?	(18)?
3 of 10 permits	13	16	2013	9 of 10 permits	11	20
6 of 10 permits	12	18	2012	1 of 10 permits	13	14
9 of 10 permits	24	33	2011	2 of 10 permits	10	12
4 of 10 permits	12	16	2010	1 of 10 permits	13	14
3 of 10 permits	16	19	2009	1 of 10 permits	20	21
7 of 10 permits	13	20	2008	1 of 10 permits	17	18
5 of 10 permits	19	24	2007	N/A	17	17
8 of 10 permits	8	15	2006	N/A	6	6
6 of 10 permits	15	21	2005	N/A	9	9
4 of 10 permits	9	13	2004	N/A	9	9
3	18	19	2003	N/A	7	7
6	13	17	2002	N/A	7	7
70	184	254	Total	21	96	117
5.4	14.2	19.6	Average last 13 years	3	13.7	16.7

Average
last 7 years

RM842 - 22D Remainder	RM842 - 22D Remainder	Total Harvest	RM853 - 22E	RM853 - 22E	Total Harvest	Year
My Guided Non Resident	Other Non Resident		My Guided Non Resident	Other Non Resident		
6 of 10 permits	? Of 10 permits	6	6 of 10 permits	? Of 10 permits	6	2014
2 of 10 permits	1 of 10 permits	3	9 of 10 permits	0 of 10 permits	9	2013
6 of 10 permits	0 of 10 permits	6	1 of 10 permits	0 of 10 permits	1	2012
5 of 10 permits	4 of 10 permits	9	2 of 10 permits	0 of 10 permits	2	2011
3 of 10 permits	1 of 10 permits	4	0 of 10 permits	1 of 10 permits	1	2010
3 of 10 permits	0 of 10 permits	3	0 of 10 permits	1 of 10 permits	1	2009
5 of 10 permits	2 of 10 permits	7	0 of 10 permits	1 of 10 permits	1	2008
3 of 10 permits	2 of 10 permits	5	N/A	N/A	0	2007
6 of 10 permits	2 of 10 permits	8	N/A	N/A	0	2006
4 of 10 permits	2 of 10 permits	6	N/A	N/A	0	2005
4 of 10 permits	0 of 10 permits	4	N/A	N/A	0	2004
1	(2)?	3	N/A	N/A	0	2003
4	(2)?	6	N/A	N/A	0	2002
52	18	70	18	3	21	Total
4	1.4	5.4	2.6	0.4	3	Average
	8.4 Combined					
	42% Combined					