Thank you for the opportunity to address your Board. For the record, my name is Brian Simpson, I reside in Fairbanks, I hold a master guides license and operate on the northern Seward Peninsula between Shishmaref and Brevig Mission. I have been in the guiding industry for 27 years. I base my hunts from these villages with widespread support and active participation from these communities.

**Concerning proposal #202:**

I support shortening the non-resident caribou season in subunits 22D Remainder and 22E from August 1st to Sept 30th. This optimizes the period wherein the bulls are at their maximum trophy value and their meat and fat is at its’ prime condition. Harvesting full rut caribou bulls is a complete waste of animals.

I support reducing the non-resident bag limit to one bull per regulatory year.

I would also request the board extend the open area for both resident and non-resident caribou hunting within subunit 22E to include east of, and including the Nuluk River drainage.

The existing geographical boundary defined as east of, and including the Sanaguik River drainage was established to protect reindeer herding operations. As the caribou continue to move west, these reindeer have been absorbed into the caribou herds. The last active reindeer herd in subunit 22E occupies range west of the Nuluk River. Reindeer cannot be re-introduced onto leased range lands until the caribou are again absent.

Leaving the boundary as is results in the un-necessary loss of hunting opportunity primarily for local residents of Shishmaref in close proximity of their homes. The cost of gas remains at $7.50 per gallon, and anticipated harvest would be minimal, as this represents the current extremity of the caribou range. I am responsible for most of the non-resident harvest in the adjacent areas and project minimal, if any, bull caribou net increase in annual harvest, as we are harvesting the same animals when they wander across the subunit boundaries.

**Concerning Proposal #40:**

This ADF&G sponsored proposal is disingenuous when considered in context with the northern regions proposed concurrent management decision regarding the RM842 non-resident bull moose permits.

I thought this proposal was a routine request to maintain a hunt, that I disagree with in principle, but weighing the negligible negative impact on an otherwise overall healthy moose resource in this subunit, with the minimal benefit it provides local resident hunters, I have previously chosen to abstain from comment.

The departments’ justification for requesting routine re authorization of this cow moose hunt, quoting verbatim “we recommend continued authorization of antlerless moose hunting where moose populations are increasing and hunting pressure is low. This portion of unit 22D is relatively remote with difficult access and these factors contribute to limited hunting pressure in the area”. The justification continues citing overall growth of the population, higher calf:cow and calf:adult ratios, low annual harvest of cows and claiming that village harvest surveys carry more weight than mandated harvest tickets represent.
The conservation and sustainability of the moose resource in sufficient abundance to have a surplus over ANS requirements to allow for a non-resident hunt is critical to my operation. As our field observations concur with the departments justifications in seeking a re authorization of this antlerless moose hunt, I was shocked when recently contacted by the department informing me of their intent to close the RM842 permit hunt.

I was researching and preparing a response to the regional office when I was informed by individuals who participated in the most recent board meetings that a department representative testified before this board that the local guide was informed and concurred with the decision to terminate the RM842. As the only licensed guide registered in this game unit I can categorically state that I am vehemently opposed to this department action and do not appreciate being misrepresented by the department. If department staff where held to the same statutory and ethical standards as licensed guides, they would face severe consequences for this type of behavior.

I hereby petition the board to halt the departments proposed action to terminate the RM842 permits on the following grounds:

This is an allocation issue, which are routinely deferred to the board by the department.

This action must first be presented in the form of a proposal by the department, in the proper regional cycle, allowing sufficient and reasonable time for public comment and normal board deliberations.

The department submitted proposal #40 before the board with justifications for a positive finding which directly contradict any possible justifications to terminate the RM842. The serious conflict in the department’s positions should be solved in an open forum to assure the public of its’ competency.

Comments Concerning General Sheep Issues:
1 – The recurring theme from testimony before this board touches on the issue of the cost of non-resident sheep licensing. Non-resident sportsmen from the other 49 states are already funding 90% of Alaska’s fish and game budget through funding from the Pittman- Robertson Act, non-resident hunting licenses and the costs of the various locking tags required for all species hunted. And yet the repetitive refrain from most residents who purchase $50 or $5 SA licenses and a no cost yellow sheep harvest ticket alludes to a scenario wherein non-residents are not already overwhelmingly supporting our hunting opportunity despite the fact that 99% of them never come here to hunt.

2 – Another repeated statistic is that 40% of the Alaska annual sheep harvest is by non-residents, and to level the field they should be reduced to some undefined but “fair” percentage between 10 and 20% of the annual harvest. The board can allocate opportunity but it cannot determine individual competence or the outcome for any given hunt. A guide who maintained a 10 to 20% success rate would not be in business long. The board is doing its job in line with our state constitution when it manages and regulates to provide the maximum amount of opportunity for the maximum possible number of interested hunters without harming the resource sustainability.

3 – Formulating statewide restrictions applying to all sheep hunters, for the use of aircraft in the field as actual hunting tools on sheep hunts, vs. simply used as vehicles to transport hunters and gear into otherwise inaccessible locations, would alleviate many legitimate grievances, and is in line with fair chase ethical hunting standards.