



# Ta'an Kwäch'än Council

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April 28, 2020

Honorable Pauline Frost, Minister of Environment  
Government of Yukon  
[Pauline.Frost@gov.yk.ca](mailto:Pauline.Frost@gov.yk.ca)

Dear Minister Frost,

**Re: Ta'an Kwäch'än Council comments on 2019 Wildlife Act regulation changes for moose management**

Ta'an Kwäch'än Council (TKC) would like to provide feedback on the proposed 2019 Wildlife Act regulation changes that will affect moose harvest in TKC Traditional Territory. TKC staff within the Lands, Resources and Heritage (LRH) department have participated in public engagement processes, consulted with the Southern Lakes regional biologist, and hosted a community dinner with the Laberge Renewable Resources Council with the Fish and Wildlife Management Board in attendance. Views and feedback gathered from TKC Citizens during these processes strongly support conservation measures to decrease hunting pressure and increase moose populations within TKC Traditional Territory.

**Proposal 1: Adaptive Management of Moose in Yukon**

TKC supports this proposal to allow for moose management by game management subzones or groups of subzones. According to data from Yukon Environment most moose management units within TKC Traditional Territory are experiencing harvest levels which may be near or above the limits of a sustainable harvest level. This decline in moose populations has raised concerns within TKC and we feel harvest restriction measures to slow this decline are necessary. TKC LRH staff have heard concerns from Citizens and Elders regarding the declining number of moose seen in TKC Traditional Territory and the increase in licensed harvesters on the land. More proactive measures to limit harvest of moose are necessary to preserve moose population levels. TKC is in support of greater management of subzones through permit hunt authorizations. The population of Whitehorse has continued to grow, and hunting continues to be a popular

recreational activity. As such, TKC's Traditional Territory and wildlife are experiencing unprecedented pressure from recreational users. Limiting the number of hunters on the land will become necessary to preserve wildlife populations, especially in moose management units that are easily accessed through backcountry travel by boat or off-road vehicle access.

TKC is also in support of this adaptive management measure as it allows Renewable Resource Councils to make community specific recommendations to the Minister. TKC LRH staff regularly coordinate with the Laberge Renewable Resources Council on wildlife management issues and are in support of measures which allow long term wildlife management to be undertaken on a community level.

### Proposal 3: Sustainable harvest in the Sifton-Miners Range Moose Management Unit (MMU)

TKC supports this proposal to manage licensed harvest for the Sifton-Miners Range Moose Management Unit. Data from Environment Yukon suggests that harvest in this MMU is above sustainable levels. TKC is supportive of enacting both a permit system and strongly supports off-road vehicle restrictions. As with other MMU's in TKC Traditional Territory, this area is easily accessible to hunters and recreationalists due to its proximity to Whitehorse and high prevalence of trails within the area. Citizens have commented about the loss of hunting opportunity over the years in this area, due to an increase in hunter presence and off-road vehicles.

The Sifton-Miners Range MMU overlaps with TKC Settlement Land R-9A and many hunters travel through R-9A to access alpine areas. TKC Citizens and other local area residents have repeatedly expressed concerns about the growing number of off-road vehicle users in the area. Moose in this area are within 40 kilometers of the City of Whitehorse, and off-road vehicle users can access wetland and alpine areas in a two-hour trip. It is feasible for many hunters to access this area with an off-road vehicle, harvest a moose, and return home to Whitehorse within a day. This ease of access to the area has unnecessarily increased the trail network through R-9A and has caused degradation to established trails. The cumulative impacts of recreational land use, including unsustainable harvest pressure through off-road vehicle use, have led to habitat fragmentation and degradation of moose habitat in this area.

While TKC supports enacting a permit hunt system and off-road vehicle restrictions, we are uncertain of an antler restriction provision. During feedback gathering processes, TKC Citizens questioned the practicality of antler configuration requirements for both Proposal 1 and Proposal 3. There were also many concerns regarding how this provision would be enforced, and the potential wastage of meat in the event of accidental shootings. We look forward to further consultation with YG regarding the use of this tool if necessary.

We thank you for the opportunity to provide comments on this important Wildlife Act regulation change. Moose have always been and will remain an important traditional food source for Yukon First Nations. TKC shares in the concerns of Environment Yukon regarding the status and overharvest of moose in the Yukon. We look forward to continued consultation regarding conservation of moose populations for future generations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kristina Kane', written over a horizontal line.

Chief Kristina Kane,  
Ta'an Kwäch'än Council

CC: Graham Van Tighem, Executive Director, Yukon Fish and Wildlife Management Board