

**YUKON FISH AND WILDLIFE
MANAGEMENT BOARD**



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April 18, 2018

Honourable Pauline Frost, Minister of Environment
Department of Environment
Government of Yukon
Box 2703 (V-3A)
Whitehorse, Yukon

Minister Frost,

Re: Thinhorn Sheep Sheep Working Group

Thank you for your February 22, 2018 response regarding the recommendations based on the work undertaken by the Thinhorn Sheep Harvest Working Group. As you know, the Yukon Fish and Wildlife Management Board has been actively involved for many years in issues related to conservation of wild sheep, most recently with the Department of Environment as members of the Thinhorn Sheep Harvest Working Group created out of the 2015-2016 regulation change process.

Please find below our final recommendations in consideration of your response.

1. Place the remaining Game Management Subzones (7-13, 7-17, 7-20, 7-24, and 7-26) in Game Management Zone 7 East on permit for Dall's sheep as per the regulation change proposed in 2015-2016.
2. Following appropriate consultation with affected parties (including First Nations, RRCs, and the outfitter of the area), the Minister should revoke the 1993 Commissioner's agreement regarding special conditions placed upon the outfitter for Game Management Subzones 7-23 and 7-25 in Outfitting Area 17.
3. Advance a regulation change to open Game Management Subzone 7-15 for limited entry harvest opportunities.
4. In partnership with the Board and Department staff, redistribute Permit Hunt Authorizations throughout Game Management Zone 7 East to accurately reflect the most recent population data, and this redistribution should include creating opportunities in game management subzone 7-19.

In your response, you have indicated that you support Recommendations 1-3, and that you accept Recommendation 4. We are in agreement with this response, and where you "support" the recommendations we gather you will champion these recommendations and bring them

forward for Cabinet approval as soon as practicable. It should be noted that the original regulation change regarding the placing Game Management Subzones (7-13, 7-17, 7-20, 7-24, and 7-26) in Game Management Zone 7 East on permit for Dall's sheep came from the Department of Environment in 2015, and as such we understand that it continues to be reflective of the Department's current position on this issue.

In relation to your responses to the additional issues identified by the Working Group, please see our comments below.

1. Access/ATV – hunters and non-hunters

Increasing access to wilderness is one of the most important issues with respect to conserving our fish, wildlife, and habitat for future generations. While ORV use is in essence a land-based activity, and not all ORV use is for hunting, it cannot be downplayed that a common intention of ORV use is for access to hunting areas. The Board believes that ORV use should be addressed in a broad fashion, by the Department of Environment and the Department of Energy Mines and Resources, and any regulations developed should address the impact of ORV use by hunters on wildlife populations and their habitat. The Board has been involved in the ORV use regulation development since the beginning of the process (before the current public engagement period), and is determined to continue our involvement.

2. Harvest pressures/distributions to other GMZ

We all know that if hunting is limited or closed in one area, harvest pressure is distributed to other areas. With this principle in mind, permitting or closing hunting areas in GMZ 7 should be done in conjunction with improved monitoring for the sheep populations in the surrounding GMZs, in order to mitigate the effect of harvest pressure redistribution.

3. Public Education and Ethics

The Board is eager to be involved in the development and/or review of any hunter education and ethics materials for the public, especially as they relate to encouraging respectful harvest practices. We will continue to work with Jim Welsh and Conservation Officer Services Branch on this issue.

4. Outfitter Quotas

Outfitter harvest and presence in GMZ 7 was identified as a strong issue with the public during the 2015-16 regulation change engagement, and as such the Board is happy to see the Department showing interest in reviewing the quota guidelines. Should changes to the outfitter quota process be considered, the Board must be involved as per our mandate under Chapter 16 of the Umbrella Final Agreement.

5. Regional vs Territorial approaches to thinhorn sheep management

The above point about harvest pressure distribution also ties in to the need for proactive, adaptive management that considers thinhorn sheep at the territorial level, not only at the GMZ level. The Science-Based Guidelines for Management of Thinhorn Sheep in Yukon are a fantastic tool but are not the only source of knowledge to consider in sheep management – First Nations, RRCs, outfitters, and the public should be.

6. Communications with First Nations harvesters

In agreement with your response, the Board is eager to work with First Nations governments, as well as Yukon government, to develop communications materials about Yukon's wild sheep directed at First Nations harvesters. Notably, the term "thinhorn sheep" does not sit well with some First Nations members of the Board – using the term Dall's sheep or the more general wild sheep was preferred.

We thank you for your time in considering this letter, and we look forward to continuing to work with the Department of Environment to conserve Yukon's wild sheep for generations to come.

Sincerely,



Frank Thomas

Chair, YFWMB