



May 08, 2020

Graham Van Tighem
Executive Director,
Yukon Fish and Wildlife Management Board
2nd Floor, 409 Black Street
Whitehorse, YT

RE: Moose Harvest Management Proposals

Dear Yukon Fish and Wildlife Management Board,

Tr'ondëk Hwëch'in is providing the following letter to the Yukon Fish and Wildlife Management Board (YFWMB) regarding the proposed Wildlife Act regulations changes 1-3, collectively referred to as the Moose Harvest Management Proposals.

For Tr'ondëk Hwëch'in, the COVID-19 situation has presented a number of challenges to our day to day operations, impacting communications with our citizens, limiting staff capacity, and affecting important consultation efforts and timelines. As per April 24th email correspondence sent from Fish and Wildlife Manager Lee Whalen, Tr'ondëk Hwëch'in has requested an extension to the May 15th public review timeline. We hope that this request is accommodated by the Board in order to discuss the following matters:

FN Consultation: Tr'ondëk Hwëch'in is concerned with the Board amalgamating First Nation consultation into the general public input during the public review stage. We feel that this diminishes Yukon First Nations input and participation, and is not consistent with Chapter 16 of the Yukon Final Agreements. First Nation consultation at this stage is imperative to ensuring that Board recommendations are consistent with Chapter 16 and reflect Yukon First Nation values throughout the territory.

Please note, we have repeatedly requested a direct meeting with the Board. We appreciate that the online survey is an opportunity for us to provide comments, but we feel that a meeting between TH and the YFWMB is an appropriate, and necessary, component of the consultation on these proposals.

Proposal 1: While we recognize the intention of the Adaptive Moose Management proposal is to provide a greater variety of harvest management tools to allow Yukon Government to be more reactive, we have a number of key concerns and comments on this proposal. These include:

- While Proposal 1 is intended to address declining moose populations and limit overharvesting that may occur outside sustainable limits, Ch. 16 of the Final Agreement guarantees the right of YFN's for subsistence harvest within their traditional territories. As such, use of the Adaptive Moose Management tools must consider potential consequences, such as overcrowding in unrestricted game management subzones or deferring hunter efforts to other accessible regions of the Yukon, which could have negative impacts to subsistence harvest. For example, while *antler configuration* may decrease hunter success, it could result in increased hunter effort requiring more time on the land, or force hunters to travel farther into the backcountry. Similarly, Tr'ondëk Hwëch'in is suspect of the effectiveness of *timing windows* for limiting moose harvest. The result of implementing this management tool would likely be concentrated licensed hunter presence for a shorter time during prime harvest times and moose rut.
- Monitoring: Effective adaptive management relies on a robust monitoring program. Increased efforts by managers to gather data to assess population estimates, the geographic distribution of moose, cow to bull sex ratio and calf survival rates will be necessary for an adaptive management regime to be successful. Furthermore, Tr'ondëk Hwëch'in recommends increased harvest effort information is gathered from licenced hunters as a reporting requirement, at minimum in areas with adaptive management limitations. We feel that mandatory collection of harvest effort is another important indicator of change over time.
- Threshold Hunt: Tr'ondëk Hwëch'in does not support the threshold harvest approach as an appropriate tool in the THTT. Successful moose hunting occurs within a concentrated period of time during moose rut, and introducing thresholds could result in concentrating hunting activities during this short time, causing overcrowding which would in turn impact subsistence harvesters.
- YFWMB Moose Harvest Management Framework: Although Tr'ondëk Hwëch'in was unaware of the recent review of this document, there seems to be a number of good potential tools for consideration. For example, group hunting has potential to address overharvest and overcrowding in small numbers. We look forward to upcoming consultation mentioned in the foreword of this document and welcome the opportunity to directly provide input.
- Local Conservation Concerns: While we support local RRC's considering adaptive proposals for local conservation concerns, this term should be well defined in advance of approving any proposals. What constitutes a local concern is likely worthy of some debate, especially considering regional and territorial impacts and the interplay with what may be seen as a local concern versus a territorial wide concern.

Proposal 2 & 3: While we recognize that proposals 2 and 3 intend to address local conservation concerns, there are Yukon-wide impacts that need to be considered:

- Tr'ondëk Hwëch'in is concerned that the management approach of limiting harvest opportunity in an increasing number of areas in the Yukon will result in increased

hunting pressure in our Traditional Territory. It can be clearly shown that increasing regulations in one area results in an increase of activity to adjacent areas as hunters gravitate to zones with less restrictive management regimes. With these proposals, Tr'ondëk Hwëch'in Traditional Territory will be one of the last areas in the Yukon with a large road network that does not have additional limitations to licensed moose harvest. This scenario concerns us greatly and we would like to note the potential of this management approach to further impact subsistence harvesting rights of TH citizens.

- While these proposals are a measure to address overharvest, Tr'ondëk Hwëch'in feels that Yukon Government must take a more proactive role to preserve and enhance renewable resources in the Yukon, as per Chapter 16 of the Final Agreement. By devoting more time and resources to regular moose surveys, managers would have a better understanding of population estimates to inform sustainable harvest metrics. Currently some of these estimates are based on 10 year old data, which does not reflect current realities in many MMU's.

The above summarizes the major concerns that Tr'ondëk Hwëch'in would like to discuss with YFWMB before your recommendations are submitted to the Minister as per UFA 16.7.11 . We hope that the Board will accommodate our request and take the time to consult with Tr'ondëk Hwëch'in in regards to the Moose Management Proposals.

Sincerely,



Darren Taylor
Natural Resources Director,
Tr'ondëk Hwëch'in

Cc. Dawson District Renewable Resources Council

Kyle Russell, North Yukon Regional Biologist