

**YUKON FISH AND WILDLIFE
MANAGEMENT BOARD**



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November 24, 2020

Honourable Pauline Frost
Minister of Environment
Government of Yukon
Box 2703
Whitehorse, Yukon
Y1A 2C6

Minister Frost:

***Re: Yukon Fish and Wildlife Management Board Final Recommendations on Proposed
Hunting and Fishing Regulation Changes***

I am writing to you today to address concerns regarding communications, and conservation relating to the new Dall Sheep management approach implemented in the summer of 2020 for Game Management Zone 7 East.

In the past, the Board worked closely with Environment Yukon following the 2015-2016 Yukon *Wildlife Act* regulation change process. We addressed a regulation change proposal advanced by the Government of Yukon to place the remaining (non-permitted) Game Management Subzones in Zone 7 East on Permit Hunt Authorization (PHA).

Due to complications with the regulation change, the Board formulated a Thinhorn Sheep Working Group following the public review. The working group consisted of three Board members and three Environment Yukon Fish and Wildlife Branch staff members. Following several productive meetings, the Working Group made recommendations to the Board, and the Board advanced the same four recommendations to you on December 15, 2017.

This issue was revisited in 2020, and following a presentation given by Fish and Wildlife Branch staff on February 19, 2020, the Board advanced formal recommendations to you on February 24, 2020. Here is an excerpt from the letter and a list of our recommendations:

"the Board is supportive of the implementation of our initial recommendations. We hope that within the communication initiatives for this regulation change, it is made clear to Yukoners that this is not an increase in opportunity but rather a conservation-oriented proposal that will redistribute permits in specific subzones, to ensure a balanced approach."

The Board's recommendations from the letter were as follows:

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

The Board was pleased with your response sent on May 1, 2020, stating that our recommendations would be formally accepted. You indicated that these would be implemented in advance of the 2020 hunting season, and these changes would be communicated to Yukon hunters through a media release, various social media platforms, the Yukon.ca website, and directly through your Client Services staff.

Following your letter, a substantive change to Dall Sheep management was implemented in Game Management Zone 7 in the summer of 2020. The Department now manages harvest in Game Management Zone 7 East by issuing Permit Hunts via Sheep Management Units, rather than Game Management Subzones (as recommended by the Board). This is a very significant change in harvest allocation, and has raised several biological and sociological concerns. The changes implemented within Game Management Zone 7 East do not reflect the scope of the Board's initial recommendations, and contradict them along with your formal response letter sent on May 1, 2020.

Unfortunately, the Board was only made aware of this change to Dall sheep management in Game Management Zone 7 East when members of the public began raising concerns with Board members and staff. In addition, the public and some Associations stated that the Board had ignored an essential portion of its mandate under 16.7.6 of the Umbrella Final Agreement, "*The Board shall make provisions for public involvement in the development of its decisions and its recommendations.*" This misplaced scrutiny put us in a complicated situation and has unnecessarily eroded the public's confidence in the Board.

When members of the public began questioning Department staff about the origins of the change, the Department's response was to state that the change had been publicly reviewed by the Board in 2015-2016, and were based on a set of recommendations from the Board and/or the Thinhorn Sheep Working Group. As you can see from our original set of recommendations and your accompanying letter this is not the case.

At one time, the Board did discuss managing Dall Sheep in Game Management Zone 7 via Sheep Management Units after survey work and analysis was completed by the former Sheep/Caribou Biologist in 2014 or 2015. However, the intent was not to alter the approach which allocates PHA's via Game Management Subzone, but to improve population monitoring by identifying groups of subzones that could reasonably represent a population of sheep. By using this approach, we could utilize each sheep management unit as a distinct population, and then apply total permit numbers to Sheep Management Units. Through this approach, we intended to continue utilizing Game Management Subzones to manage hunter access, success, and quality of experience. This was the original intent of the working group.

With this current change, some of the areas in the larger Sheep Management Units (i.e., Arkell), are now at risk of overharvest, particularly in the most easily accessible portions. It is biologically naïve to assume that harvest pressure will be evenly distributed across a Sheep Management Unit without some mechanism in place. As a result, hunting efforts will likely be concentrated on areas with pre-existing trails and easy access. Managing with PHA's within Game Management Subzones has proven effective for over 20 years, and ensures we do not have to rely on hunters to distribute harvest pressure.

The Board raised these issues with your staff on multiple occasions and we have yet to resolve this matter. Therefore, due to the severity of this issue we are formally bringing this to your attention. We must make provisions for public involvement prior to making a decision on this management change as specified in the Umbrella Final Agreement (16.7.6). Depending on the outcome our discussions, and a potential public review, it may be necessary to re-evaluate administering Dall Sheep permits via Sheep Management Units and potentially return to the original system.

Finally, the Board formally requests that the Department of Environment staff re-evaluate their communication on this change, and cease conveying to the public that this change was a recommendation of the Board or the "Thinhorn Sheep Working Group".

If you have any questions or require further clarification, please contact our Executive Director Graham Van Tighem at (867) 667-5835.

Thank you,

A handwritten signature in blue ink, appearing to be 'CS', with a small arrow pointing to the right.

Sincerely,
Carl Sidney, Chair

Cc: John Bailey, Deputy Minister Environment