



January 8, 2021

Carl Sidney, Chair  
Yukon Fish and Wildlife Management Board  
Box 31104  
Whitehorse, YT Y1A 5P7

Dear Mr. Sidney:

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

Thank you for your letter dated November 24, 2020 outlining your concerns related to communications and the new management approach for thinhorn sheep in Game Management Zone 7 east. I appreciate the time and energy the Yukon Fish and Wildlife Management Board has invested in this initiative since the 2015 regulation change proposal submitted by the Department of Environment.

As I reflect on our previous correspondence on this topic, it appears that there has been a misunderstanding of the expected outcomes of the Board's initial recommendations that were provided to me in a letter from then-Chair Frank Thomas on December 15, 2017. In this letter, Chairman Thomas provided some important preamble to the recommendations you have repeatedly referenced in subsequent communications:

*"Following our last working group meeting, the group addressed the outstanding issue of establishing Permit Hunt Authorizations in the remaining subzones in GMZ 7 east. After an extensive review of the information provided, and considering the Department's intent to move from Game Management Subzone specific management to a broader "Sheep Management Unit" approach – which will better accommodate movement of Dall's sheep between subzones – the working group has the following recommendations:" (emphasis mine).*

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This statement led me to believe that the working group, and subsequently the Board, considered and were supportive of the Department of Environment's suggested Sheep Management Unit approach for the biologically relevant reason cited. In fact, I believed the four recommendations that followed this excerpt were linked to the Sheep Management Unit approach.

Consequently, harvest opportunities were designed accordingly – to allow access to sheep that moved between subzones. If the Board was not supportive of the Sheep Management Unit approach to permit allocation, I expected that would have been clearly stated in the recommendation correspondence. Further, the positive feedback the Board provided to staff after conferring with you at your February 2020 meetings indicated we were in agreement about how your recommendations on this matter would be implemented.

With respect to your 16.7.6 Umbrella Final Agreement obligations, I note, the Board did not publicly engage on any of the recommendations provided to me via the December 2017 letter. I gave you the benefit of the doubt that your obligation had been achieved through your initial public engagement efforts undertaken as part of the regulation change process. I am well versed in the content of the Umbrella Final Agreement, and respect the spirit and intent of the various provisions contained within – including the creation of the Board and its role in fish and wildlife management in Yukon.

After a highly unusual 2020, I am pleased to report that sheep harvest in Game Management Zone 7 east was within sustainable guidelines (i.e. less than 4 per cent of non-lambs), including all the Sheep Management Units in this zone (ranging from 1.5-3.5 per cent), and the Arkell unit (2.4 per cent) where you specifically expressed concern. Your letter states that sheep are now at a risk of overharvest by allocating permits at the scale of a Sheep Management Unit. Fundamentally, I disagree with this assessment, as permit numbers in each Unit were conservatively allocated in recognition of the number of available sheep – to specifically protect them from overharvest. In addition, in a year where Yukoners accessed outdoor recreation opportunities at an unprecedented rate, the harvest was sustainable.

I invite you to revisit this sheep harvest management discussion with officials in the Fish and Wildlife Branch. If you have other information that indicates that there is a conservation concern, I urge you to provide this information to the Branch in the course of those discussions.

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With respect to communications concerns, I understand that Departmental officials have already reached out to the Board towards establishing a communications protocol. Please contact Marc Cattet, Director, Fish and Wildlife Branch ([marc.cattet@gov.yk.ca](mailto:marc.cattet@gov.yk.ca) 867-667-5715) to work towards a positive resolution of this issue.

Mahsi,

A handwritten signature in blue ink, appearing to read 'Pauline Frost', written in a cursive style.

Pauline Frost  
Minister of Environment