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January 8, 2021

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

Minister Frost,

Re: 2020 Yukon Fish and Wildlife Management Board Recommendations for Adaptive Moose Management Regulation Changes 1-3

Thank you for your response to our set of recommendations on Proposals 1-3 of the 2019/2020 cycle regarding the set of Adaptive Moose Management regulation changes.

We appreciate the gravity of these regulatory and management changes and, therefore, feel that the additional time was well spent reviewing these proposals and considering the options discussed. We also sincerely appreciate the Department's breadth and depth of comments and meaningful dialogue to help us with our response.

Proposal 1: Adaptive Moose Management in the Yukon

The Board recommended the following:

- 1.1 The Minister set aside this proposal;**
- 1.2 The Minister establish a comprehensive moose management plan.**

As you have cited, some examples supported the "Adaptive Moose Management in the Yukon" proposal. However, the overwhelming majority of examples indicate that First Nations, Renewable Resources Councils, Associations, and the public identified significant concerns with these proposals' nature.

You have accepted recommendation 1.1, which sets the proposal aside for the time being, *"leaving the door open for the development of future regulation proposals that use tools such as threshold hunts, registration hunts, and other instruments where management needs cannot be adequately addressed using our existing tools."*

While we are glad to hear you accept our recommendation, the Board urges the Department to delay developing these regional mechanisms until we can establish and review:

- **First Nation harvest priority areas per Traditional Territory, and;**
- **Review the Yukon Fish and Wildlife Management Board's Moose Harvest Management Framework**

In the Department's Adaptive Management proposal, several examples of the Board's Moose Harvest Management Framework tools are used as examples that could be enabled within the Adaptive Management proposal. The Board expressed a desire to review the "Framework/ toolbox" document before utilizing any examples from the framework within this regulation change review.

One of the aspects of the Adaptive Management proposal that detracted from its public acceptance was the use of examples from our "Moose Harvest Management Framework" (or 'toolbox") document. The tools cited in the proposals were among the most controversial of all the possible management options, and thus, were not supported by the majority of Yukoners (i.e. antler restrictions). Including these tools led to public confusion around whether we were reviewing the Department's Adaptive Management Framework Regulation Change or the Board's Moose Harvest Management Framework.

One question that has arisen several times since our public review was why the current Permit Hunt Authorization system is not reviewed and implemented in conjunction with First Nation Harvest Priority Areas? This would allow managers to address moose harvest concerns more effectively in these critical areas, rather than treating all Moose Management Areas, such as areas adjacent to the communities, Elder hunting areas, and remote sites, as equal for harvesting priority and access.

Proposal 2: Sustainable Harvest Management of Moose in the South Canol Moose Management Unit

The Board recommended the following:

- 2.1 The Minister set aside this proposal, deferring it to the next regulation cycle.**
- 2.2 The Department conduct a new survey in the area**
- 2.3 The Department reconfigure the Moose Management Unit.**

Your response was to **vary** the Board's recommendations (above). However, by placing the area on permit with Ministerial discretion on permit numbers, refusing to allocate resources to survey the area, and keeping the Moose Management Unit configuration the same, you have effectively **set aside** our three recommendations for this proposal. These recommendations were advanced with our Board's utmost consideration – citing a fundamental lack of public support for this approach and considerable objection and concern by the public, RRC's, Associations, and First Nations. By and large, there was very little support for this change. In our extension of the public review, only 21.1% of survey respondents found Proposal 2 to be amenable. This is mainly owing to how the information was presented to the public, along with issues relating to an evident lack of recent survey data, mere speculation of harvest levels from First Nations, a lack of First Nation harvest reporting, and steady licensed harvest numbers continues to raise many questions about the validity of, and the need for changes outlined in this proposal.

As for harvest pressure, the licensed harvest has remained steady for the past ten years. This continuity demonstrates that the area is likely not being over-harvested. Otherwise, harvest numbers would undoubtedly be decreasing. Providing a more recent survey will provide the much-needed perspective and current information on whether the moose population within the management unit is declining, stable, or increasing – rather than merely identifying the harvestable surplus as you have done to date.

As stated by the Teslin RRC, this Moose Management Unit and particularly the areas that border the South Canol Road to the west, are inaccessible. Therefore, by putting the entire area on permit, you limit harvest in areas that see few to no licensed harvesters based on access on the South Canol Road. Remote harvest areas in this Moose Management Unit will be affected by this proposal, which the Board feels is unnecessary and ineffective.

Finally, it is well-known that Game Management Zones and subzones were delineated for "thinhorn sheep" management and not moose management. Subzones that are grouped create **Moose Management Units**, and in this area, these present a crucial example of how a large-scale management change like this can negatively affect all harvesters, especially when the areas delineated for management were done so for the wrong species (Sheep vs Moose). The Board does not wish to inflate or deflate harvest (licensed or subsistence) artificially. We hope to promote moose management actions that enable necessary and practical actions. We can achieve this by addressing the harvest and recovery of species based on accessible areas potentially over-harvested versus areas that are inaccessible and see little or no licensed harvest or harvest of any kind.

Proposal 3: Sustainable Harvest Management of Moose in the Sifton-Miners Mountain Moose Management Unit

The Board recommended the following:

3.1 The Minister accept this proposal

We agree that the information provided defines a need to act in this area, and the Board is pleased that the Minister has committed to putting the Sifton-Miners Mountain Moose Management Unit on permit. We are also pleased that you have committed department resources to conduct additional moose population studies for the Sifton-Miner's Mountain Moose Management Unit. However, we are perplexed as to why the Department cannot allocate similar resources to address our concerns as per recommendation 2.2.

We believe that similar efforts and studies should be conducted for the South Canol Moose Management Unit to advance our understanding of the area and consider proposing a more fitting solution towards the South Canol Moose Management regulation change.

Finally, it seems the issue of predation is not being addressed in any of these proposals. We are concerned that despite the hard work we did with the Department to create, review and implement the Yukon Wolf Conservation and Management Plan – we have not done any work to enhance trapping in any of the areas of concerns that are identified. These should be addressed under Goal 4, recommended implementation measure 16 and Goal 5, recommended implementation measures 18 and 19.

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

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Carl Sidney, Chair