



P.O. Box 1380
Dawson City, Yukon
Y0B 1G0

Phone: (867) 993-6976
Fax: (867) 993-6093
Email: dawsonrrc@cnorthwestel.net

*"The primary instrument for Renewable Resource Management in the
Tr'ondek Hwëch'in Traditional Territory"*

Yukon Fish & Wildlife Management Board
Box 31104
Whitehorse, Yukon Y1A 5P7

May 2, 2011

Dear Sir(s)

The Dawson District Renewable Resource Council would like to submit the following comments and concerns it has in regards to the review of the Yukon Wolf Conservation Management plan. We would like to start off by saying that this plan was way overdue for a review and hope that the interval will not be as long the next time for the plan that arises from this review.

The DDRRC has heard concerns about the number of wolves in the Dawson area and the increasing hunting pressure being put on the local moose populations. If this is in fact what is actually happening, it won't be long before the mortality of moose exceeds the sustainable level and we could see a rapid decline in their numbers. There are two options at this point to help stop this from happening, the first being drastically reducing human harvest of moose and hope that this is enough to restore some sort of balance. The other option is to increase the predator harvest to help restore a balance. This council believes in a holistic management approach; if humans take from one side (ungulates) then they must also take from the other side (predators) on a level that works towards maintaining a balance.

The 1992 Wolf Management Plan reflected the concerns at that time and we encourage the 2011 plan to reflect today's concerns and help trappers and licensed hunters better manage wolves. Studies have shown that 30% of the wolf population can be harvested per year without causing a decline in the population. We feel that this new plan should reflect and encourage this, especially in areas where human harvest of moose or caribou is high or where their numbers are decreasing. The 1992 Wolf Management Plan took away some of the tools that helped licensed hunters contribute to wolf harvest, for example by shortening the hunting season and introducing bag limits. We feel that there is a need for ensuring the Management plan gives back those tools. It needs to enable trappers and hunters to help better manage wolf populations in order to avoid the need for drastic measures like aerial wolf control programs being implemented in areas of drastically declining ungulate populations due to hunting pressures or natural causes. This also leads into the need for management on a more local level as one Yukon wide plan may hinder the ability for communities to deal with situations that are unique to their area.



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Thank you for considering the DDRRC's comments and we encourage everyone to work towards a sustainable balance for all wildlife populations.

Yours truly,

Dan Reynolds
Co-chair

Mark Wierda
Co-chair