

**Mervyn's Yukon Outfitting
Tim & Jen Mervyn**

**Box 33036 Whitehorse
Yukon, Canada, Y1A 5Y5
Phone: (867) 633-6188
Fax: (867) 633-5070
E-mail: myo@yukonsheep.com
www.yukonsheep.com**

Re: Wolf Management Plan Review

May 16, 2011

Dear Committee Members

I am pleased that the Wolf management conservation plan is finally under review. It has been a long time in coming and it has become obvious that some changes are necessary as well as it is time to follow up on some of the recommendations from the 1992 plan that were not carried through. Unfortunately the 1992 plan may be failing in one of its most important objectives 7.1 "Future management of caribou moose and sheep and their habitat in the Yukon must have the objective that the populations are not allowed to reach levels where wolf reduction might be considered necessary...."

It is important to me, as I am sure it is important to everyone, that all animals have the opportunity to live the best life that they can live. To do this requires holistic wildlife management which includes managing predators as well as prey. By doing so, we have the opportunity to increase the quantity of life for wolves as well as all ungulates. By managing for sustainable population levels we can have more wildlife on the land which includes both prey and predators. This benefits everyone.

The Mandate of the UFA in Chapter 16 makes some points to consider. They are:

- 16.1.1.1 to ensure Conservation in the management of all fish and wildlife resources and their habitats
- 16.1.1.2 to preserve and enhance the renewable resource economy
- 16.1.15 To guarantee the rights of Yukon Indian People to harvest and their rights of Yukon First Nations to manage renewable resources on settlement land
- 16.1.1.7 to integrate relevant knowledge and experience both of the Yukon Indian People and of the scientific communities in order to achieve conservation.
- 6.1.1.9 to honor the harvesting and fish and wildlife management customs of the Yukon Indian People and to provide for the Yukon Indian People's ongoing needs for fish and wildlife.

These points show the requirement and the importance of managing wildlife including wolves. To effectively do this is an ongoing process and requires long term commitment as well as an increase in available "tools". Although the decisions may be difficult, they are required.

The 1992 plan made several recommendations that seem to have been ignored and must be followed through on such as:

- 11.2 the potential effectiveness of more traditional methods of controlling or reducing wolf populations should be assessed including ... hunting trapping and removal of wolf pups from dens.
- 11.10 small scale aerial wolf control programs should be examined
- 11.11 the impact of all terrain vehicles on ungulate harvest should be assessed and appropriate guidelines established
- 11.13 Department of Environment should publish the annual harvest of ungulates and predators but all user groups

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It is time to follow through with the 1992 recommendations as well as look other recommendations and new options including but not restricted to.

- Effective trapline utilization.
- Trapping incentives.
- Extend the wolf hunting season.
- Extend the trapping seasons for wolves.
- Remove bag limits for the licensed hunters
- Remove wolves from the list of Big Game Animals and call them small game.
- Permit night hunting of wolves.
- Permit aircraft to be used to spot wolves while hunting
- Permit snow machines to be used to actively hunt wolves.
- Ensure access to traplines for persons interested in targeting wolves.
- Utilize private aircraft under permit to hunt wolves. - Aerial harvest can manage wolves in difficult to reach areas and have the added benefit of being able to target an entire pack which has shown to have more beneficial and longer term results for the prey.
- When a prey population is in decline permit immediate predator management without having to wait 2 years before action may be taken.
- Permit individuals to trap to assist a conservation officer

An overlooked point is that there are approximately 5000 wolves in the Yukon. Alaska has demonstrated that the sustainable harvest on wolves in individual areas can be as high as 40 to 50% provided there is adequate adjacent refugia. (Alaska Department of Fish and Game, letter attached.) However at the Yukon's stated sustainable harvest rate of 30%, that is 1500 wolves that can be harvested annually. The current 15 year average harvest of all users is 165 leaving a sustainable harvest of 1335 wolves per year which remain unharvested. This demonstrates that major change to existing practices, legislation and attitude is required if we are ever going to be able to even attempt to harvest wolves at a rate that will benefit the prey and, in turn benefit the wolves. However the cost of not doing what is required is also huge. We will not be able to have the wildlife available for consumptive and non-consumptive use.

There is often much discussion about the requirement to first survey and then resurvey. However we only need to know a few things before we know if increased predator harvest is required to assist a prey population. Those are:

1. Are there currently enough animals to supply the consumptive and non consumptive demand?
2. Does local or scientific knowledge indicate that the population is above or below the sustainable carrying capacity? (will the habitat support more prey?)
3. What is the recruitment rate of the species you are concerned with?

With this information a decision can be made on the benefit of increasing or reducing the predator harvest rate.

Additional Items to consider.

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- Yukon Research shows that a pack of 2 wolves kill 27 moose per winter.
- Many female moose sheep and caribou that have lived to maturity never had a calf or a lamb survive their first year of life.
- If moose calf survival rate is under 7% . The number of female calves that are living to recruitment age is not enough to replenish the depleting herd. (In those situations even with no human harvest the moose population will still diminish.)
- In counties with large prey populations and few predators, the annual human harvest regularly achieves 33%
- Choosing to manage at low level sustainable equilibrium, (no or limited predator management) permits very low or no human use or harvest..
- Wolf populations can rebound far faster than prey populations.
- If effective predator harvest tools are available, the government will not need to become involved in predator management.
- The UFA may inadvertently prevent traditional First Nation wolf harvest and management methods.
- Even liberalized hunting and trapping cannot reduce a wolf population over a large area. (Alaska Department of Fish and Game, letter attached.)
- Predator management needs to take place over large regions in order to have sustained and long term results.

Please address the issue of wolf and wildlife management in a positive and effective way as it will take more than a token change in the existing rules and policies to manage wolf and wildlife populations in a way that can benefit the wildlife and the human population that depend on them.

Sincerely

Tim and Jen Mervyn