



**May 16, 2011**

**To: Yukon Wolf Conservation and Management Plan Review Committee**

**From:** The Yukon Conservation Society

**Re:** Yukon Wolf Conservation and Management Plan Review

The Yukon Conservation Society would like to thank the Review Committee for the opportunity to provide our comments and recommendations regarding the Yukon Wolf Conservation and Management Plan review.

**Executive Summary:**

YCS' position is that the updated Wolf Conservation and Management Plan should state that lethal wolf control will not be used, and that sterilization of alpha pairs should only be used as a very last resort. The Plan should also state that wolf control will only be undertaken after a local hunting ban on the ungulate population targeted for recovery, and two years of research to determine the causes of the ungulate population decline.

YCS does not support bounties for wolf hunting, subsidizing trapping of wolves, or raising the bag limit for wolves.

**Detailed Comments:**

It is the opinion of the Yukon Conservation Society that underlying principles of the 1992 Yukon Wolf Conservation and Management Plan were ground breaking for the time of its creation; wolves were recognized as an integral part of the ecosystem, and wolf control programs were to be implemented only as a last resort in attempts relieve predatory stress on ungulate population threatened with local extinction. We believe that this underlying tone of the plan should be reflected in the updated plan.

The Yukon Conservation Society believes that the Yukon Wolf Conservation and Management Plan review is another opportunity for the Yukon to adopt a ground breaking wildlife management plan. While the original plan was built on good fundamental principals for its time, YCS believes that the section that attempts to describe a last resort scenario when wolf reduction programs could be considered requires an overview in order to be brought up to date to reflect the information we have gained regarding wolves, ungulates and their place in the Yukon's Ecosystems.

Since the original drafting of the plan in 1992, our understanding of wildlife management and the natural world has increased. Wolf predation is not the sole factor influencing

ungulate populations in the Yukon; other factors include range conditions, forage/nutrient status as well as climatic effects (Farnell 2009). While many of these factors are not easily manageable, we can not ignore these factors because they are out of our control, we must realize that they are present, that they influence the health of ungulate populations, and that they are difficult to manage. Given that there are stressors on ungulate populations in the Yukon that we can not easily control, we must realize the importance of properly managing the stressors that we do have control over. Habitat and range degradation due to industrial developments and increased hunting access due to road construction are easily within our immediate control in the Yukon.

The plan appropriately recognized the importance of focusing on hunter education as well as implementing temporary hunting bans on specific ungulate populations, however we must also take an active approach to protecting ungulate habitat so that we can decrease the chance of ungulate populations entering a threatened status. YCS believes the plan should include stronger policies to protect areas important to ungulate populations in order to avoid a last resort situation where wolf reduction may be considered.

Regarding wolf control, it is the belief of the Yukon Conservation Society that based on information gathered during and after wolf reduction programs in the Yukon, wolf reduction by lethal means does not work from ethical, ecological or long term management perspectives.

As you know, in the last 30 years, there have been several major wolf reduction programs in the Yukon implemented for the purpose of recovering ungulate populations: Finlayson, South West Yukon, Aishihik, Southern Lakes, Forty Mile, and Chisana.

The Finlayson program utilized aerial control shooting (lethal) methods to reduce wolf numbers. The target caribou population increased in numbers during the reduction program but decreased in numbers shortly after the reduction program due to the recovery of wolf populations. Wolf numbers in the area increased post reduction program to densities that were even greater than pre-reduction program (Farnell 2009). A similar trend was witnessed during the Aishihik reduction program:

“Like Finlayson, as soon as wolves recovered in Aishihik, moose and caribou started to decline again. Both examples show that the benefits of removing wolves from the predator-prey system are brief and, upon reflection, more trouble and cost than they are worth.”

(Hayes, 2010 p.250)

Given that the goals of these programs were to mitigate the amount of deaths caused in an ungulate population from wolf predation, and that the end result was an actual increase in wolf numbers shortly after the reduction programs ended, it is the belief of the Yukon Conservation Society that reduction programs by lethal means is not a viable long term wildlife management option, nor is it an ethically or scientifically justifiable option for wolf or ungulate management in the Yukon.

Farnell determined that fertility control using sterilization is a technically feasible management option (2009) however; it is the belief of YCS that surgical sterilization of wolves has significant impacts on the integrity of a wild animal and has complex ethical implications. One of the fundamental goals of animals is to find a mate or mates and produce offspring. Sterilization addresses wolf control from a numbers management perspective, but it also robs the animal of fundamental rights and significantly affects the integrity of the wolf population in the Yukon. There are serious ethical implications involved with actively controlling which wolf genes are allowed, and not allowed to persist.

It is the opinion of the Yukon Conservation Society that wolf reduction by fertility sterilization can only be used as a last resort when an ungulate population is at threat of local extinction, and all other methods have been explored.

Furthermore, YCS believes that the past success of fertility sterilization as a wolf reduction strategy should not be used by those responsible for wildlife management in the Yukon, to avoid other methods for improving ungulate numbers. Sterilization is not a low impact solution and it should not be considered as the best solution. It is the opinion of YCS that the Wolf Conservation and Management Plan Review should state that research will continue to find and implement if needed, alternative methods for helping ungulate populations that are in trouble.

Alternative methods to sterilization such as hunter education and predator exclusion should continue to be explored. Further more, YCS believes that all efforts must be made to mitigate the impacts of humans on ungulate populations so that scenarios when wolf reduction is considered are avoided. Ungulate habitat should be protected from developments and those responsible for wildlife management should carefully monitor the current status of ungulate populations and evoke all policies available to ensure ungulate populations do not become threatened.

YCS also has the following specific recommendations to the Yukon Wolf Conservation and Management Plan.

### ***Section 3.0 & 4.0 Principles and goals of wolf conservation and management***

The principles stated in Sections 3 and 4 are sound but need to be reiterated more forcibly, with a focus on ecosystem integrity and ensuring natural events and cycles are not disrupted by human intervention – direct or otherwise.

### ***Sections 5.0 & 6.0 Non-Consumptive and Consumptive Uses of Wolves***

Wolves are ‘valued’ by people in diverse ways, and we need to recognize the diversity of those values, and the fact that they can be quite opposed in some circumstances. Whatever your perspective, trapping, hunting or wildlife viewing, the integrity of ecosystems is a vital component central to those activities. It should also be mentioned the ‘wilderness’ aspect of Yukon is widely acknowledged and actively pursued by the tourism industry and visitors – with wider economic benefits.

### ***Section 7.0 The Management of Ungulate Species***

The plan’s recommendations regarding research and monitoring of the status of wolves and ungulates in the Yukon are sound, but many have failed to be implemented, and in some cases been neglected. Research and monitoring of ungulate populations and harvest

in the Yukon is required to provide adequate and reliable information on their status and trends. It will take cooperation, goodwill and considerable resources from all levels of government and management bodies to ensure current and accurate information and forecasts (harvesting rates, population, distribution etc) are available on an annual basis.

***Section 8.0 Wolves and Agriculture***

The plan's position and recommendations need to be reiterated more strongly. The promotion of Yukon agriculture and increases in local food production may create further conflicts between wolves and domestic animal populations. Improvements to planning techniques and processes should be implemented.

***Section 10.0 & 11.0 Public Education and Conflict Resolution, Research***

The plan's recommendations on public education need to be reiterated and more forcibly implemented. Education will of course need to be based on accurate baseline information and forecasts based on appropriate research. This will require appropriate resources.

**Literature cited**

R. Farnell, Three Decades of Caribou Recovery Programs in Yukon: A Paradigm Shift in Wildlife Management, Department of Environment, Fish and Wildlife Branch, Government of Yukon (2009) p. 5.

Hayes, B. Wolves of the Yukon. Published by Bob Hayes, Wettersteinstraße 12, 82024 Taufkirchen, Germany, (2010) p. 250.