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Re: Wolf Management Plan Review

May 11, 2011

Dear Committee Members

The Yukon Outfitters Association (YOA) is pleased that the Yukon Wolf Conservation Management plan (YWCMP) is under review and we would like to make the following suggestions in order to assist in improving the plan and transforming the document so that will benefit the wolves as well as other wildlife and all Yukon residents. This review is long overdue and we hope that the interval between future reviews will be much shorter.

The YOA believes in the value of all wildlife. We believe in looking after the wildlife and the environment first and that each animal, regardless of species, is important. We support holistic management which recognizes the interaction between wildlife species and recognizes the human dependence on wildlife for both consumptive and non-consumptive use. We believe that all wildlife should be managed for maximum sustainable abundance. This allows for more wolves on the land as well as for more ungulates. However it also requires active management of wolf populations. First Nations people have recognized this interaction for generations and actively managed wolf populations for sustainable wildlife populations. Their lives often depended on this management.

The documentation supplied the WCMP review committee indicates that there is an estimated 4500 to 5000 wolves in the Yukon. It also indicates that a 30% annual wolf harvest is sustainable. Therefore basic math shows that an annual harvest of 1500 wolves is sustainable making it the most underutilized big game species in the Yukon. It also demonstrates that unless there is a significant change wolf harvesting methods the Yukon will never attain the annual sustainable harvest level let alone actually harvest wolves at a rate that will permit ungulate populations to increase or to reach maximum sustainable abundance.

We are not managing our wildlife populations with the current annual average wolf harvest is 165 wolves or 3% of the population out of sustainable annual harvest of 1500. This leaves 1335 wolves annually available for harvest without reducing the population. The absence of wolf management is not management at all. It not only means less ungulates on the land but also means that because wolves are dependant on their available food sources, there are less wolves as well.

The 1992 plan is restrictive and needs to be more enabling so hunters and trappers can harvest more wolves to help maintain the balance between prey and predators. By encouraging a more active management approach that works towards increasing harvest levels while still maintaining healthy but balanced wolf populations. When predation is high, the ungulate population diminishes even without human harvest of ungulates. If humans are to have any ungulate harvest it therefore also requires predator harvest or management in order to maintain the balance. Should



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wolves remain under harvested as they are now, Yukon residents will be unable to harvest moose and caribou in the future unless Government takes the unpopular step of using drastic measures to reduce wolf numbers.

One major flaw in the 1992 wolf conservation management plan is that attempts to turn active wolf management into “experiments”. This is not required! It only complicates and restricts our ability to manage wolves in a timely and productive manner. Simply knowing the ungulate recruitment rate and knowing if the current ungulate population meets human desires or requirements is the only indication required to know if more or less active wolf management is required. The experiment stage is now over and the science now shows that wolf management must be done if we are to properly manage wildlife populations and have any reasonable number of ungulates available. We, and what appears to be the majority of the Yukon people, believe that more wolf management is now required.

Unfortunately the 1992 WCMP took away some of the tools that helped hunters achieve higher harvest levels and replaced them with shortened wolf hunting seasons and reduced bag limits. These need to be changed and liberalized as well as institute other tools that would help hunters trappers and First Nations;

It is critical that real and effective tools are available to manage wolf populations. It has been demonstrated that the existing tools available can not maintain a managed, but reduced wolf population let alone effectively reduce a high population to a manageable level. Remember that Yukon wolves can sustain an annual harvest of 30% or 1500 wolves a year and this will still not effectively reduce the population. Some ways that we have identified to assist in active and sustainable wolf management are:

- 1 Ensure traplines are properly utilized by the trappers or ensure that assistant trappers have access to those underutilized traplines.
- 2 Promote trapping through education and monetary incentives. (This has been done in other jurisdictions in Canada.)
- 3 Enable and encourage traditional knowledge and methods of wolf management such as denning for FN and non FN people. (Wording in the UFA and FN final agreements may prevent FN wolf harvest and management. 16.4.2 and then the definition of Subsistence.)
- 4 Extend the wolf hunting season. We suggest no closed season or, at very least, the season should run from August 1 to June 15 as it did prior to 1998.
- 5 Extend the trapping seasons for wolves.
- 6 Remove bag limits for the licensed hunters
- 7 Remove wolves from the list of Big Game Animals and call them small game or furbearers. In earlier years they were not classified as big game. This change would



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- mean that trappers and hunters would not to have to wait the 6 hours after flying to hunt wolves thus increasing opportunity and possibly success.
- 8 Exclude wolves from the rule which prevents anyone locating wildlife from the air and then hunting it within 48 hours . This would allow pilots to pass on kill sites to trappers and hunters, again increasing harvest success.
 - 9 Have more wolf trapping courses and snaring workshops at the community level.
 - 10 Allow trappers and hunters to hunt wolves with snow machines while keeping a moderate distance from them.
 - 11 At the discretion of a conservation officer or RRC, permit trappers to access underutilized trap lines for wildlife management purposes.
 - 12 At the discretion of a conservation officer or RRC authorize trappers or private individuals to obtain permits which allowed for use of aircraft in harvesting wolves.
 - 13 Eliminate the requirement of a 2 year hunting closure before active management can occur to assist ungulate populations. Let us respond quickly when management is required.
 - 14 Promote the issuance of special permits to trap when no trapping concession is in effect. (Section 69 or Yukon Wildlife Act) and special permits to trap to assist a conservation officer (Section71)

These are just some of the tools that could help trappers and hunters better manage wolf populations in the Yukon and these suggestions will assist in ensuring that the government does not have to get involved with active wolf management in order to maintain or recover ungulate populations. The YOA would like to encourage the revised management plan to reflect the concerns of today and into the future. There will be a need to better manage all wildlife as the pressures increase with the growing human populations and activities within the Yukon.

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

Dan Reynolds
President, Yukon Outfitters Association