

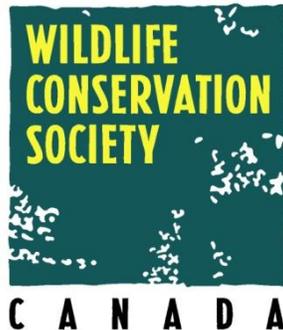
Comments on

**Yukon Environment's
Recommended Yukon Wolf
Conservation and Management Plan
August 2011**

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INTRODUCTION

This document summarizes Wildlife Conservation Society Canada's comments on the Yukon Government's Recommended Yukon Wolf Conservation and Management Plan of August 2011. We have organized our comments following the order the Goals and Recommended Implementation Measures appear in the Plan, with the Plan's text in italics and our comments in regular font.

WCS Canada is grateful for this opportunity to provide recommendations to this Plan review process, and on the Recommended Plan. In general we find the 2011 Recommended Plan to be an improvement on the 1992 Plan, and a well-designed and thorough document.

PLAN COMMENTS

Goal 1: Conserve wolf populations in recognition of the role of wolves in ecosystems and the maintenance of biodiversity

Comment: The role of wolves in shaping ecosystems and maintaining biodiversity cannot be understated. Given this, we recommend that the text of this section include a more detailed description of the role of wolves in maintaining the integrity of Yukon's ecosystems, such as was provided in the 2011 Yukon Wolf Conservation and Management Plan Review Fact Sheet 3, "Wolves in the Ecosystem". We also recommend this theme be explicitly reflected throughout the Plan. Emphasizing the role of wolves in ecosystems provides important context for understanding and implementing wolf conservation and management goals.

Recommended Implementation Measure: Continue to collect and share traditional, local, and scientific knowledge on wolf numbers, ecology, and predator-prey ecosystems in areas where there have been collaborative decisions about management priorities.

Comment: We recommend this Measure stress the importance of information-sharing both in advance of and following any collaborative management decisions. This Measure should also explicitly list the sharing of ungulate harvest data, by all hunters, as one of the key pieces of information necessary for management.

Recommended Implementation Measure: Provide input to land use planning and environmental assessment processes to protect known dens and mitigate disturbances to wolves during the period of pup rearing.

Comment: Large wilderness areas are critical to maintaining intact predator-prey relationships and the role of wolves in functioning ecosystems. Wilderness areas are also important ecological benchmarks or 'control areas' in an adaptive management framework, e.g. in scientific studies of ungulate responses to wolf management. For these reasons, and to support the Plan's goal of 'no management intervention' through 'most of the territory' (p 11), input to land use planning processes by Yukon and First Nation governments should include recommendations for conserving large areas with no resource development. Further, given that wolf management activities occur primarily in response to ungulate declines, ensuring adequate protection for key ungulate habitats and corridors within land use planning processes, including limits to access, is critical. We recommend that the wording of this Measure be broadened to include the need for planning and

environmental assessment processes to address key ungulate habitats, the issue of spatial scale in ecosystem processes, and the need for protected ecological benchmarks.

Goal 2: Manage the harvest of wolves in recognition of their social, cultural, and economic importance to all Yukoners.

Recommended Implementation Measure: Ensure accurate, timely, and verifiable wolf harvest information is collected in as consistent an approach as possible throughout Yukon.

Comment: We support this Measure.

Recommended Implementation Measure: Amend regulations for hunters and trappers to report wolf harvest within 15 days after the end of the hunting/trapping season.

Comment: We have no comment on this Measure.

Recommended Implementation Measure: If the marking of wolf pelts remains the key harvest reporting method, options that include a metal tag, tattoo, or other tool should be explored. The YFWMB and RRCs can recommend the most appropriate form of identification. For administrative and enforcement purposes one common method throughout Yukon is best.

Comment: We agree that one method needs to be chosen and applied uniformly through the Territory. We recommend the Measure include specific information about which agency will make the final choice and by when.

Recommended Implementation Measure: Remove the sealing fee for wolves harvested by licensed hunters.

Comment: We have no comment on this Measure.

Recommended Implementation Measure: Amend regulations to enable the Minister to vary bag limits for wolves under an adaptive management framework.

Comment: First, we agree that there needs to be an administrative mechanism in place to allow for flexibility in quotas (both increases and decreases), and that adaptive management provides an appropriate framework. However, this approach depends on managers having data on wolf population size (data that are harder to acquire than similar data for ungulates), as well as other information as indicated in the Plan text. We caution that this information will often be difficult, and prohibitively costly, to acquire so the administrative decision-making may become influenced by political lobbying as much as data. Consequently we recommend that this Measure also include a process for public review and input into the quota-setting process. Second, the list of factors to be considered in the changing of quotas should also include data on population size and trend in wolf prey (notably ungulates), and the spatial scale of the predator-prey system being managed. Finally, we also take this opportunity to caution that implementation of adaptive management depends not just on the availability of relevant information, in this case data on wolf and ungulate population sizes and trends, but also on a process that is responsive to this information and allows for a rapid change in management direction when necessary.

Recommended Implementation Measure: Amend wolf trapping and hunting season in regulation to enable an adaptive approach to management. Seasons should be coordinated to the extent possible to facilitate enforcement, but must be closed during the birthing and rearing period.

Comment: We have no comment on this Measure.

Recommended Implementation Measure: For the purposes of wolf trapping, replace the obligation to complete the current trapper training program with a program specific to trapping wolves. This program could consider separating mandatory (e.g. regulations and legal obligations) and optional (e.g. fur and pelt handling) training requirements. An option to allow for a person to challenge the exam should be considered. As well, the ability for a person to acquire a specific wolf-only trapping authorization should be provided.

Comment: Generally we support this Measure. However, we are sceptical of the ability to efficiently administer a challenge to the exam. We recommend that the Measure include a process, and timeline, for the automatic licensing of trappers who already have passed the general trapper training program, if that program has adequately covered the basics of wolf trapping.

Recommended Implementation Measure: Yukon government should maintain its membership with the Fur Institute of Canada and continue to provide financial support to the national trap research program.

Comment: We support this Measure.

Recommended Implementation Measure: Continue to promote more humane methods of wolf trapping through training and ensure regulations reflect best available technology.

Comment: We support this Measure.

Goal 3: Manage wolf populations in recognition of the enjoyment and appreciation that Yukoners and visitors have in experiencing wolves in Yukon wilderness.

Recommended Implementation Measure: Continue to incorporate opportunities to learn about wolves into the wildlife viewing program, and provide outreach materials for use by the wilderness tourism industry and recreationalists.

Comment: We support this Measure. We suggest emphasizing the ecological importance of wolves in this Measure. For example, "Continue to incorporate opportunities to learn about wolves and their ecological role into the wildlife viewing program."

Goal 4: Use wolf harvest as a management tool to reduce predation rates of moose and caribou in local areas.

Comment: This Goal appears to be included in the Plan as an attempt to provide advocates of wolf population control with some way forward to implement their management desires, given that the Plan strongly rejects the application of large-scale aerial wolf control as a tool for ungulate population enhancement. We support the Plan's rejection of large-scale aerial control, but have significant concerns regarding the value and applicability of Goal 4. We are sceptical that 'local' wolf population control will be an effective tool for ungulate population enhancement over the

long term, ecologically and economically, because the arguments against large-scale control also apply to small-scale or local control. Any local wolf control will have to be intensively applied (large proportion of local wolves removed including whole packs) repeatedly through a long time period. The text in the Recommended Plan already expresses this scepticism, and justifiably so. Consequently, if this Goal continues to be part of the Plan, any implementation must be approached as an experiment with adequate scientific data gathered as a precondition to entering the experiment (we provide specifics in our comments on the Measures below). Further, this Goal must be clear on the definition of 'local'. What is meant by 'local' in terms of the scale of an ungulate population, the number of wolf pack ranges covered, or the scale of wildlife management zones? This Goal should set clear limits on the scale at which 'local' management will be implemented. This Goal must also be clear on the tools that will be legally available for wolf control. We recommend that there be explicit rejection of the use of poisons and aerial shooting. Finally, for clarity, we recommend the Goal be reworded as follows: "Use wolf harvest as a management tool to reduce wolf predation rates on moose and caribou in local areas."

Recommended Implementation Measure: Collaboratively identify priority areas to manage wolves to increase moose and caribou numbers.

Comment: A key prerequisite for the identification of priority areas will be the availability of data on the harvesting of ungulates in the areas of concern. We recommend that the institution of adequate First Nation and other harvest reporting (wolves and ungulates) be a pre-condition for any local wolf control management.

Recommended Implementation Measure: Collaboratively develop and implement a study design in priority areas which considers local, traditional, and scientific knowledge. A program evaluation should take place and determine the impact on wolves, moose, and caribou.

Comment: We strongly recommend that any application of this Measure only occur in concordance with ungulate monitoring, harvest reporting by all (First Nation and other), and a full study of factors causing ungulate declines, notably habitat loss, weather, non-wolf predation, and harvesting and the role of access. As indicated in the Measure, a full study of ungulate response to trapping efforts must also be a condition for implementation. Given that changes in quotas, as administered by a directive from the Deputy Minister (Goal 2), will likely be the mechanism for implementation, our Recommendations regarding that Measure (the need for public notice and review, and for adequate background information) are particularly important.

Goal 5: Integrate ungulate management with wolf management goals.

Comment: This is a worthwhile goal. However, the list of Measures does not include the most important one with regard to integration of wolf and ungulate goals, which is the need for mandatory harvest reporting by all wildlife harvesters (First Nation and other) and the provision of these data to inform the management process. We recommend the inclusion of a specific Measure identifying the need for mandatory harvest reporting for ungulates and wolves in a central database.

Recommended Implementation Measure: Research and monitoring of ungulate populations in priority areas should be ongoing to provide information on status and trends.

Comment: We support this Measure.

Recommended Implementation Measure: Develop collaborative harvest management plans for ungulates in accessible areas. These plans should reflect the best available knowledge on population status and consider the draft Coordinated Harvest Monitoring Model for the Yukon and the Porcupine Caribou Herd Harvest Management Plan.

Comment: We support this Measure.

Recommended Implementation Measure: Recommendations to local and regional land use planning and environmental assessment processes must address the effects of access, the combined effects of multiple developments on ungulate populations, the identification, management and protection of important ungulate habitats, and goals of guiding ungulate management plans (e.g. federal management plan for Northern Mountain Caribou).

Comment: We support this Measure.

Goal 6: Manage wolves to address human-wildlife conflict.

Recommended Implementation Measure: Working from the existing human-wildlife conflict directive, develop a protocol to address human-wolf conflicts that includes prevention, communication, protecting human life and property, and timeliness.

Comment: We support this Measure. A key step in preventing conflict can be adequate assessment of risk in land use zoning for agriculture as part of land use planning processes. We recommend explicit reference to this need in this list of management approaches. We also recommend that the Yukon Government make a clear commitment to collect and verify incidents of human-wolf conflict, including livestock depredation events, to ensure that management decisions are governed by objective information and not public perception of the extent and outcome of human-wolf conflicts.

Recommended Implementation Measure: The 2006 Yukon Agriculture Policy should be reviewed to ensure steps are taken by livestock owners to protect livestock from wolf predation.

Comment: We support this Measure.

Goal 7: Promote research, education programs, and information sharing to enhance understanding of wolf behaviour and ecology and management decisions affecting wolves.

Comment: We support this Goal and all associated Measures.