



December 8, 2023

Yukon Government
Department of Environment
PO Box 2703, Whitehorse, Yukon
Y1A 2C6

Marc Cattet
Director, Fish and Wildlife
Via email: fish.wildlife@yukon.ca

RE: Response to conservation concerns for sheep populations in southwest Yukon

Dear Marc Cattet,

The Yukon Wild Sheep Foundation (YWSF) thanks you for your letter dated November 24, 2023, regarding recent sheep surveys conducted by the Government of Yukon indicating significant population declines in southwest Yukon ranging in severity from a 16 percent decline in the Ruby Range Sheep Management Unit to a 63 percent decline in the Donjek Sheep Management Unit. We understand the seriousness of the issue and the Department of Environment's position that intervention is required.

We welcome the opportunity to work with the Department, Renewable Resources Councils, and other stakeholders to cooperate and collaborate on an amenable solution to this issue that ultimately benefits wild sheep. Our entire organization is dedicated to conservation issues such as this and we have significant training, resources, and a network of support throughout North America that is ready to pitch in on this issue. We note your timeline of April 1, 2024, for implementation of an intervention does not seem tenable for a conservation challenge of this magnitude, but we assume this will be adjusted, given the scale of the issue.

We are keen to discuss the types of adaptive management suggested in your letter, and we look forward to finding out more about the tools the Department may be considering in response to the declining population, other than closures. We have much to contribute when it comes to tools for direct action conservation methods to protect sheep, and we have funding partnerships and a proven track record of on-the-ground conservation action to help preserve wild sheep. Efforts to recover these populations should include management actions to enhance habitat, reduce predation, increase education and other methods to promote recovery, some of which have never been applied before in the Yukon.

We have noted the urgency in your letter, and while we share the department's alarm, we have some concerns with the suggested approach. We feel strongly that the Yukon has a robust and proven framework for fish and wildlife management, guided by many inputs, including Chapter 16 of the Umbrella Final Agreement. We urge the Department to follow the existing framework to meet this

conservation challenge while recognizing the solution is a long-term prescription of information collection and action. Working around the existing framework presents a risk that could curtail a response.

Additionally, we note with some concern that the intervention suggested by your letter appears to only target licensed hunters, which we do not see as the most necessary nor effective management tool to contribute to the recovery of these sheep populations. In review of the recent data in conjunction with Yukon's Guidelines for Management of Thinhorn Sheep, the ram to nursery populations in five of the six sheep management units of concern are above the threshold for sustainable harvest and the harvest rates over the last eight years are below the 4% threshold. The guidelines also state harvest of full curl rams is the lowest risk strategy for long-term maintenance of sheep populations, meaning that closure of harvest would be largely ineffective, due to the fact the full curl regulation prevents licensed hunters from overharvesting.

We appreciate the data you have shared with us regarding the wild sheep populations in southwest Yukon and the opportunity to provide input. This issue highlights the need to gain a greater understanding of regional sheep populations across the Yukon. By obtaining and examining data at frequent intervals over the long term, especially in southwest Yukon, we can better understand population dynamics and trends to find causality and be proactive instead of reactive with our actions.

YWSF looks forward to working with YG to respond to this conservation challenge.

Please do not hesitate to contact us.



Spencer Wallace
President, Yukon Wild Sheep Foundation

CC: Michelle Dawson-Beattie, Chair, Yukon Fish and Wildlife Management Board
Catherine Pinard, Wildlife Harvest Biologist