



November 28, 2014

Yukon Fish and Wildlife Management Board
Box 31104
Whitehorse, YT Y1A 5P7

Dear Mr. Dickson

Re: Roadside Bear Hunting Regulation Proposal

The Carcross Tagish Renewable Resources Council would like to thank the Board for attending the public meeting in Tagish hosted by the Council. The meeting was well attended and the presentation by Board and Environment staff generated a lot of questions and comments from the audience. The audience represented a broad spectrum of views and interests on this matter, which included representatives from the Teslin RRC, First Nation citizens and elders as well as both harvesters and non- consumptive interests from the Southern Lakes region. As well, residents of all four communities in the CTFN traditional territory – Marsh Lake, Tagish, Carcross and Mt Lorne – were represented at the meeting. There was considerable emotion and polarization on this issue as expected and experienced elsewhere in public meetings. However, the factual and low key objective presentation and responses by Board and Environment staff (Graham Van Tighem and Rob Florkiewicz) were especially appropriate and contributed to a constructive and respectful atmosphere at the meeting.

As was pointed out at the meeting, the Board has an obligation to take into account non- consumptive uses of resources in the management and harvest allocation of Fish and wildlife under Chapter 16 of the UFA. Since this clause (16.3.17) is under General provisions of Chapter 16 this obligation would also appear to apply to RRC's and Governments involved in fish and wildlife management and allocation.

General observations of public views on the regulation proposal based on views expressed and questions at the meeting may be summarized as follows:

1. It was clear that Grizzly bears and in particular Grizzly bears found along roadsides in the Southern Lakes region represent a very significant wildlife viewing and tourism resource.

2. There was broad support for hunting and harvesting wildlife for food but little support for trophy harvesting and the ethics of trophy harvesting of Grizzly bears along road corridors.
3. There was recognition that the status of Grizzly bears is very different from Black bears in terms of biology, abundance, species status and harvest management in Yukon.
4. There was little or no concern expressed that Black bears were not included in the proposal and roadside hunting of Black bears would continue. This seems based in part on the fact that Black bears are very abundant across Canada and North America and thus not a wildlife viewing and tourist attraction. As well, Black bears are harvested for food and there is very little consumptive harvesting of Grizzly bears.
5. There was some concern expressed that harvesters would see this proposal as the “thin edge of the wedge” and roadside hunting closures for major subsistence and food species like moose and caribou would follow. However the fact that Black bears are not included in the proposal in part because they are commonly hunted for food should allay these concerns.
6. There was a lot of discussion and concern with the details of the proposal – especially the narrow width of the proposed no hunting corridor i.e. 30m on each side of the road from the centerline and limitation to the spring season only. It was pointed out that Grizzly bears frequent road corridors in late summer and fall feeding on roots and this is still part of the tourist and wildlife viewing season.
7. There was little or no concern expressed that the proposal would only apply to the Southern Lakes and along the Alaska Highway from Johnsons Crossing to the Slims River west of Haines Junction. Presumably this reflected the Southern Lakes audience in attendance but also that people in attendance were commenting from a wildlife viewing and tourism perspective and how it would directly affect them and not from a more general anti-hunting perspective.
8. There was interest in the status of Grizzly bear populations in the Southern Lakes region and the findings of the ongoing study. Some felt there were more bears and others expressed safety concerns in communities.

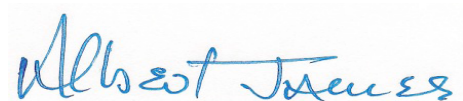
Analysis and Recommendations:

1. Clearly this proposals falls under the Boards mandate and obligations under the UFA for consideration of non-consumptive use in the management and harvest allocation of wildlife given the special status of Grizzly bears and the social and economic importance of this species for wildlife viewing and tourism in the Southern Lakes region.
2. There are limited opportunities to engage the non-hunting public in wildlife management issues but the CTRRC appreciates that such support is critical in the uphill battle to protect critical wildlife habitat from land use and development in the Southern Lakes region. This proposal represents an important opportunity for such public engagement.
3. If this proposal does proceed it should be set up for success and not for failure. Limiting roadside hunting for Grizzly bears to a 30m corridor that does not cover the whole highway right of way and to the spring season will likely set it up for failure and more conflict on the longer term. This is especially important as this represents the first significant initiative for the Board over the past 2 decades on wildlife viewing and non-consumptive use. To set the proposal up for success the CTRRC recommends the following:
 - a. That the no hunting corridor for Grizzly bears should cover the highway right of way or 30 m as proposed and discussed at the meeting. Grizzly bear feeding activity in terms of digging for roots is most commonly observed at the outer edge of the cleared highway right of way near the forest edge and not in the ditch.
 - b. The ban of roadside hunting of Grizzly bears be extended through September as bears feed extensively on roots on roadside corridors in late summer and fall in August and September as we heard at the meeting and this overlaps with the bear viewing and tourist season.
4. As this represents the first significant initiative of the Board, RRC's and governments on wildlife viewing and non-consumptive use under sec 16.3.17 that we are aware of under the UFA the CTRRC recommends that a public review of the implementation of the proposed regulation be undertaken in 3 years to determine whether the regulation is effective or whether changes are needed or if the regulation is ineffective and cannot be fixed and should be rescinded.

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The CTRRC appreciates the opportunity to work with the Board and Yukon Environment on this important initiative as it has significant implications for wildlife management in the Southern Lakes region.

Sincerely



Albert James
Co-chair



Ken Reeder
Co-Chair

C.C. Dan Lindsey, Director of Fish and Wildlife Branch, Yukon Environment
Director of Lands and Resources, Carcross Tagish First Nation