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November 28, 2018

Dear Tyler and Graham,

Thank you for the opportunity to comment on this important initiative. Please accept these written comments from the Yukon Conservation Society on the Draft Conservation Plan for Grizzly Bears in Yukon.

The Yukon Conservation Society (YCS) is a grassroots environmental non-profit organization, established in 1968. Through a broad program of conservation education, input into public policy, and participating in project review processes, we strive to ensure that the Yukon's natural resources are managed wisely, and that development is informed by environmental considerations.

## **General Comments**

There is much to like in this draft plan, including the statements about respect for this special apex predator. YCS firmly recognizes that grizzly bears should exist in their own right regardless of their value to humans and that the draft "Conservation Plan for Grizzly Bears" correctly recognizes it as foremost a conservation plan requiring the management of human behaviours.

YCS supports the emphasis on respect for bears in this draft plan. YCS draws attention to this because we have heard that recommendations such as increased respect for grizzly bears and respectful grizzly hunting and viewing imply that current practices are disrespectful. YCS disagrees with this perspective, just as, for example, calls for defensive driving do not necessarily imply that drivers are aggressive. We do though appreciate that for some, hunting and viewing of grizzly bears is an unacceptable practice. This is why we believe that research and monitoring of the human dimensions related to grizzly bear conservation is a priority. Without such emphasis, it is likely that status quo approaches will continue. This cannot be the case here in the Yukon. The species is far too important to



rely on anything less than excellence in grizzly bear conservation. More work must be done to understand what social science tells us about humans in relation to grizzly bears.

We further support the importance of the plan's recognition of an ecosystem-based approach for grizzly bear conservation. The absence of such an approach elsewhere has resulted in the extirpation of grizzlies from most of their historical range in North America. Consequently, these landscapes are diminished in grandeur and impoverished as ecosystems. Fortunately, for the time being, Yukon and Alaska retain enough intact habitat to sustain grizzly bears. However, this is not guaranteed. In this context it is even more vital that Yukon ensures that the grizzly bear population within its jurisdiction is healthy, now and into the future.

YCS also supports the application of the precautionary principle and adaptive management as foundational to the intent and implementation of the plan. These approaches are critical for decision-making in an environment of uncertainty and complexity. In the absence of considerable key information related to grizzly bear populations and their characteristics, a precautionary and adaptive management approach is the only way to maximize flexibility for future decision-making.

Additionally, YCS acknowledges the careful use of language throughout the draft plan. The text reads appropriately in its tone and content, so that no stakeholders are unduly criticized.

We are concerned, though, that the plan lacks a sense of urgency about protecting grizzlies. For example, on page 1, the plan reports, "grizzly bears in Yukon are likely stable and secure". YCS is very concerned about this statement given the limited and dated information the government has about grizzly bear populations. The plan may better serve its readers by including information about how quickly pressures on grizzly bears can be introduced. We draw your attention to Yukon government's plans for infrastructure development, particularly roads, and the consequences roads have on wildlife populations and their habitats. A thorough read-through of the plan with an eye on the issue of urgency, might be helpful in finalizing it.

The above point speaks to the perception by some that the Yukon is acting as a "preserve" for grizzly bears for most of the year. The argument suggests that through existing legislation and other conservation measures, grizzlies in the Yukon face few threats to their survival. This perspective does not reflect an ecosystem-based approach to grizzly bear conservation, and fails to recognize that socio-ecological systems in the Yukon are increasingly under stress due to climate change and loss of biodiversity. Regarding social



impacts of grizzlies in particular, there is a clear link in the Yukon between grizzly bears and Indigenous culture. Respecting this relationship requires greater understanding of the myriad influences affecting the persistence of grizzly bears and what the consequences of losing grizzlies are to Yukon First Nations.

There are some aspects of good management that will require the commitment of additional fiscal and human resources. The goals in the management plan are good, however they do need to be measurable. This may be difficult to reconcile with the desire for the plan not to be prescriptive. YCS is of the opinion that the plan can be prescriptive, and if there are not benchmarks and timelines to measure whether or not the plan is achieving its goals, it will have little effect. To that end, some of our recommendations are prescriptive.

YCS is also of the opinion that all information-gathering processes about grizzly bears, unless they contain sensitive Indigenous knowledge that is not to be shared widely, are an opportunity to build and share knowledge across the Yukon and beyond. There may need to be reassurances written into the text of the plan that specifically address how information and knowledge will be collected, protected and shared in an open and transparent way.

Before moving to specific recommendations, YCS would like to suggest that the Yukon government and Yukon Fish and Wildlife Management Board hold a special responsibility to Yukoners and the world to ensure grizzly bears survive. These icons of wilderness are facing increasing threats to their continued existence because of biodiversity loss and climate change. New human and fiscal resources, political will and shared decision-making between governments and communities, are needed to conserve grizzly bears in the Yukon.

This concludes our general comments. Following, organized by heading, please find specific recommendations for consideration.

## **Population**

Yukon is one of the only jurisdictions left on the planet where grizzly populations are thought to be healthy. However, there is no robust population estimate. In the absence of any proof that grizzly numbers are too high, any suggestion of a cull of grizzly bears to protect other game animals is indefensible.

**YCS recommends that a per Bear Management Unit (BMU) census take place for all BMUs within 5 years following approval of the plan.**



## **Important Habitat**

The plan mentions establishing grizzly bear refugia, but we note the paucity of discussion around the identification of important grizzly bear habitat. This is a critical first step in establishing meaningful, effective refugia.

There is no discussion of the need to consider the cumulative effects on grizzly bear populations of development, hunting or other mortality factors. The plan must recognize that, in order to avoid local extirpation and displacement of grizzly bears (as has happened in most grizzly range in Canada), there will sometimes have to be a limit to the amount of human activity in an area.

Lastly, given the ecosystem-based approach identified for grizzly bear conservation it is necessary to apply landscape scale conservation planning so that grizzly bears have the space needed to confirm gene flow and habitat.

**YCS recommends that disturbance thresholds, important habitat areas and refugia for grizzly bears be identified within 5 years following approval of the plan and that important habitat areas and refugia be given formal protection.**

**YCS recommends that as part of refugia planning, landscape-scale conservation planning for grizzly bears take place and that protection of ecosystems and connectivity is confirmed across the landscape so that gene flow and species range shifts are realized.**

## **Hunting/mortality**

In the absence of robust population numbers for grizzly bears, it is impossible to know if harvest rates are sustainable. Currently hunting quotas are determined based on indirect indicators, such as the ratio of female to male bears' mortality. It is the view of YCS that grizzly hunting is not generally a subsistence hunt, as are the hunts for moose, caribou and bison. If this is accurate, then grizzlies are generally taken for trophies rather than for meat. Two issues are substantive in this scenario. First, the absence of reliable population numbers and secondly, the wasteful practice of leaving the majority of the animal behind. In the first instance:

**YCS recommends that there be a moratorium on licensed grizzly bear harvest until a scientifically defensible sustainable harvest is identified.**

In the second instance:



**YCS recommends that grizzly bear meat be given the same status as the meat from moose, caribou, and sheep, and that it become an offense to waste the meat from a grizzly bear.**

It is the informed opinion of YCS that the killing of grizzly bears in defence of life or property (DLP) is almost always avoidable. Furthermore, we are told that it is likely that some of the licensed harvest of bears is effectively DLP kills, where a person who is having trouble with bears acquires a grizzly tag to dispose of a problem bear. The key to dealing with direct or indirect DLP mortality is education, which must be reflected in the plan. Therefore, YCS supports the development and delivery of a mandatory grizzly bear harvest education and ethics training program generally and specifically as one way to reduce the number of DLP kills.

**YCS recommends that whenever a permit is issued for activities in grizzly country, the people active in the permit area be required to take a course in how to avoid DLP kills.**

It is the opinion of YCS that the issue of roadside killing of grizzly bears was not addressed adequately in this draft plan. One of the main drivers of the development of this draft plan was general public revulsion with the killing of grizzlies beside roads. YCS is aware that a few people vigorously defend their 'right' to kill bears that have become accustomed to graze alongside roads, and bears that have become accustomed to vehicles slowing down or even stopping to view them. Killing bears under these circumstances is disrespectful, unsporting and terrible for Yukon's image as a destination to experience nature and wildlife.

**YCS recommends that a 500m no-grizzly-bear-hunting corridor be instituted along Yukon highways.**

While grizzly bears can be seen alongside all Yukon highways, roadside killing of bears has been primarily in the areas around Whitehorse. Consequently, calls for banning the practice have been mostly from this area. However, it is safe to assume that if people in other parts of Yukon should start killing these vulnerable bears, a similar level of revulsion would ensue there, and consequently the desire to control the practice. YCS does approve of more local control over hunting; however, this should not constrain Yukon from making territory-wide decisions when required. Therefore, in this particular instance:

**YCS respectfully recommends that the plan include a territory-wide ban on roadside grizzly hunting.**



YCS is aware that providing guided hunting experiences for tourists is a long-established Yukon industry and will be difficult to stop without a clear understanding of grizzly bear population characteristics. Concurrently, YCS is concerned that without current grizzly bear population characteristics the population is experiencing unnecessary harm. Therefore, YCS believes it prudent and precautionary that there be a moratorium on licensed grizzly bear harvest until a scientifically defensible sustainable harvest is identified. As earlier stated:

**YCS recommends that there be a moratorium on licensed grizzly bear harvest until a scientifically defensible sustainable harvest is identified.**

The above eight recommendations and commentary are provided in support of the draft Grizzly Bear Conservation Plan. We sincerely hope our input contributes to clarifying and confirming key actions within an identified period of time. YCS encourages the Government and Board's review of the analysis provided by the Wildlife Conservation Society Canada. We found their analysis comprehensive with important recommendations presented.

## **Summary of Yukon Conservation Society recommendations**

1. YCS recommends that a per Bear Management Unit (BMU) census take place for all BMUs within 5 years following approval of the plan.
2. YCS recommends that disturbance thresholds, important habitat areas and refugia for grizzly bears be identified within 5 years following approval of the plan and that important habitat areas and refugia be given formal protection.
3. YCS recommends that as part of refugia planning, landscape scale conservation planning for grizzly bears take place and that protection of ecosystems and connectivity is confirmed across the landscape so that gene flow and species range shifts are realized.
4. YCS recommends that there be a moratorium on licensed grizzly bear harvest until a scientifically defensible sustainable harvest is identified.
5. YCS recommends that grizzly bear meat be given the same status as the meat from moose, caribou, sheep, etc., and that it become an offense to waste the meat from a grizzly bear.



6. YCS recommends that whenever a permit is issued for activities in grizzly country, the people active in the permit area be required to take a course in how to avoid Defence of Life or Property kills.
7. YCS recommends that a 500m no-grizzly-bear-hunting corridor be instituted along Yukon highways.
8. YCS respectfully recommends that the plan include a territory-wide ban on roadside grizzly hunting.

Yukon Conservation Society strongly supports a grizzly management plan that has at its core the future of grizzly bears. We commend the Board and Government for their efforts to tackle this difficult topic on the behalf of all Yukon people.

Respectfully submitted,

A handwritten signature in black ink that reads "M. Walton". The signature is written in a cursive, flowing style.

Mike Walton, PhD  
Executive Director  
Yukon Conservation Society