

Porcupine Caribou Management Board

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February 24, 2009

Shelagh Montgomery
Project Manager
SENES Consultants Limited
4915-48th Street, Unit 23
Yellowknife, Northwest Territories X1A 3S4

Dear Ms. Montgomery:

Re YESAA Review

Thank you for the opportunity to provide input regarding the YESAA Five-Year Review. The primary concern of the Porcupine Caribou Management Board (PCMB) is the lack of the YESAA mandate to deal with cumulative effects on the Canadian range of the Porcupine Caribou Herd (PCH).

Please allow us to first provide some background with respect to the PCH. The declining population of the herd means all projects that might affect the herd's use of its range require caution. It is important to be aware that the PCMB has recently passed a resolution noting, among other things, that the herd is in immediate need of conservation.

The herd's population has been declining for at least 12 years, possibly as long as 17 years. From 1998 to the last census in 2001, the herd declined, at a rate of 1.5 percent per year, to a population of 123,000 caribou. Migration patterns and weather conditions have thwarted census attempts for the past five years, but the PCMB estimates that the herd's current population might be as low as 110,000 animals, based on annual recruitment and survival surveys.

Wildlife, including barren ground caribou herds, tend to go through cycles of increasing and decreasing populations, and fluctuations in population should be expected. However, the PCMB believes this herd's population decline may be in excess of normal fluctuations. Most arctic barren ground caribou herds tend to follow a similar cycle; however, the PCH population cycle has not been consistent with the other herds. The PCH increased at a slower rate and started to decline earlier than other barren ground herds. Until a census proves otherwise, the PCMB must manage the herd in a manner that is mindful of the indication that the population is declining.

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This matter of declining population is of such concern that the PCMB is working with all of the caribou herd's user groups to develop a Harvest Management Strategy as one means of conserving the herd. If the traditional caribou users are being asked to alter their harvesting activities, it goes without saying that other human activities in the range of the herd need to be altered or even avoided for the good of the PCH. In this case, we believe that conservation of the herd should be of utmost importance when project applications within the herd's range are being considered.

The current decline in the herd's population suggests that the caribou might not be as resilient to stresses in the environment as we would like. In addition to direct impacts of human activity, development projects also affect the herd's habitat. In turn, the wellbeing of the herd affects the ability of numerous native groups to participate in Porcupine Caribou traditions that have bonded individuals together as a community and to the earth for millennia.

In the current YESAA process, the PCMB's main concern is assessing a proposed project on a stand-alone basis. Cumulative effects are negative changes to the environment caused by an activity, combined with other past, present and future activities. In the case of the PCH, cumulative effects include not only the proposed projects under review, but also other activities throughout the herd's range such as increased levels of traffic, increased recreational activity, increased habitat fragmentation and more frequent and larger wildland fires.

The cumulative effects of all the increased human activity could potentially affect the herd's use of the range, productivity, and general health. While effects of an individual project in isolation might not have a serious impact, cumulatively, and in combination with other effects in the range, the effects could potentially be very serious.

Further, climate change has the potential to threaten the resilience of the PCH and may alter its use of the landscape. The future range of the herd, given these changing conditions, is unknown. This means that displacement of the herd as a result of a project might be more damaging than can be immediately anticipated. Because the herd's population is already declining, extreme caution should be taken to ensure the herd's long-term conservation. Consideration must be given to the entire range of the herd, not just the immediate area of a proposed project.

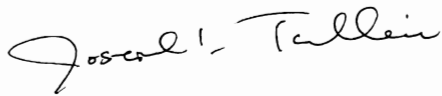
The PCMB would like to see the YESA Board make recommendations that support the long-term conservation of the PCH and its habitat. Where information is lacking or limited, the Board supports a cautionary approach where monitoring systems are established and activity is managed cooperatively considering cumulative impacts, not just considering a project on a stand-alone basis. A comprehensive, long-term monitoring program should be undertaken

immediately in Yukon to assess the cumulative effects of human activity on ecosystems, with a specific focus on the effects on the PCH. This program should be designed to be consistent with the Northwest Territories Cumulative Effects Assessment and Management Strategy and Framework and with the Northwest Territories Cumulative Impact Monitoring Program.

Once again, thank you for the opportunity to provide comments on the current YESAA process. Not only is the health of the PCH a valid consideration for its own sake, but the health of the herd is also critical in maintaining centuries of caribou traditions for First Nations in the herd's range.

If you have any questions, please do not hesitate to contact our office.

Sincerely,

A handwritten signature in black ink that reads "Joe Tetlich". The signature is written in a cursive style with a large initial 'J' and a long horizontal stroke extending to the right.

Joe Tetlich
Chair