



Porcupine Caribou Management Board

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March 2, 2014

Scott Casselman
Chair
Dawson Regional Planning Commission
Box 8010
Dawson, Yukon Y0B 1G0

Dear Mr. Casselman:

Re Comments re Dawson Land Use Plan Alternatives

The Porcupine Caribou Herd (PCH) is a barren-ground herd that ranges between Alaska, Yukon, and NWT, and numbers at least 169,000 animals (PCTC 2013). During land use planning in the North Yukon region, the PCH were deemed “the most important and valued ecological and socio-cultural resource” (NYPC 2009). Annual monitoring of the various population indicators and the herd’s distribution has occurred since the early 1970s and has resulted in a rich dataset. These data were provided to the Dawson Land Use Planning Commission for the purposes of ensuring adequate conservation of the herd’s winter range and migration routes.

The sensitive nature of the PCH is such that the Porcupine Caribou Management Board (PCMB) worked with all of the PCH user groups to develop a Harvest Management Strategy as one means of conserving the herd. Given the value of the herd by all signatories to the Harvest Management Plan, it is important to manage activities within the caribou’s range for conservation of the PCH and its habitat.

With respect to the Dawson land use plan (DLUP), we note that this planning area contains some of the primary winter range of the herd and includes major migratory pathways that bring the herd to winter ranges in fall and to calving grounds in spring. Although winter is not considered as crucial as periods like spring/calving (PCTC 1993), we note that “[w]hatever happens in the winter affects the calf survival, affects the pregnancy the next year and virtually every aspect of productivity from age of first reproduction to calf survival” (Russell 2000). The Board also notes that where major migratory paths are interrupted for large migratory herds like the PCH, significant declines in population often occur (Berger 2004, Bolger et al. 2008).

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The PCMB remains focused on ensuring that cumulative effects do not deteriorate the range of the PCH. Cumulative effects are negative changes to the environment caused by an activity combined with other past, present and future activities. In the current YESAA process, the focus remains on project reviews which are done on a stand-alone basis with limited or cursory consideration of cumulative effects. In the case of the PCH, cumulative effects include not only 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 development and implementation of land-use plans is a potential avenue to begin to address the issue of cumulative effects.

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 significant impact, cumulatively, and in combination with other effects in the range, the effects could potentially be very serious. This is exacerbated when considered with climate change impacts that are making much of Yukon's northern landscape more prone to disturbance, reducing the resilience of a caribou herd that largely relies on non-disturbed habitats, particularly during the winter period (e.g. lichen-dominated habitats).


Current legislative tools are not sufficient to address cumulative effects for the herd and the PCMB believes it is appropriate that cumulative effects are considered at the land use planning stage through the application of land use zones and appropriate tools. Since land use planning for the remainder of the herd's Canadian range is now complete and we are able to consider the DLUP region in the context of these other planning regions with respect to Porcupine Caribou, we have the following recommendations that would help ensure the long-term conservation of the herd and its habitat:

- Where development is allowed, seasonal restrictions can be an important tool in managing impacts to species. It should be noted that PCH winter habitats in LMU 6 and in many portions of the other northern LMUs used by PCH are permafrost rich and will require that winter work is only allowed when frozen ground conditions minimize direct land impacts. Unfortunately, winter activities in these areas would overlap with the presence of the PCH, making the use of timing restrictions less viable for these LMUs. Shut-downs of industrial activity, — in particular, significant oil and gas development (e.g. seismic programs, multiple drilling operations, operation of producing wells) — are generally not practical, as these programs may cost many millions of dollars. The timing of winter activities coincides with the arrival of caribou on winter grounds, which provides very limited lead in, thus creating conditions for conflict and ambiguity that are difficult to address during environmental assessment. Other conservation tools would need to be explored and considered for these northern LMUs if the PCH is to be conserved in these areas.

- The “Horseshoe” area in LMU 6 is an important east-west migratory pathway and wintering area for the PCH. It is also an area where significant harvest may occur in some years. Management of development and access in this area will be crucial. Depending on the type of development that could occur in this area, impacts could include a major change in harvest rates on the herd, PCH’s avoidance of this important migratory pathway, which could lead to the abandonment of other winter grounds in the Peel Basin, and potential abandonment of the range itself.
- Areas of LMUs 2 to 7 represent winter habitats and important migratory pathways for the PCH. Inappropriate development in specific valleys could have a greater-than-expected impact on the PCH, particularly in some of the narrow mountain valleys present in LMUs 2 to 5 and 7 or along narrow ridges found in LMU 6. These features tend to be used by migrating caribou. Management of these LMUs should focus on protection of these pathways and wintering grounds.
- A very small amount of winter habitat for the PCH has been protected in previous land use plans. Currently, a segment of Tombstone Park, Fishing Branch Park and Ecological Reserve, and some small portions of the new Wild Rivers Parks protect portions of the PCH’s key winter ranges. This means the vast majority of the PCH winter range is available for development. Most of the winter range in Canada is either IMA Zone IV or III; therefore, some of the higher levels of development would be allowed in the region. Protection of key LMUs such as those found on the southern edge of the Miner and Whitestone Rivers would help ensure adequate protection of winter and migratory ranges for the PCH in the future and would be consistent with zoning of lands adjacent in the North Yukon LUP Region.
- Where development is allowed, the Board recommends that new access points from the Dempster Highway be minimized and access be controlled.
- As identified in the North Yukon Land Use Plan, the Board recommends the use of linear disturbance thresholds consistent with those found in the North Yukon Land Use Plan’s IMAs where the PCH’s winter range is overlapped (e.g. LMU 6).

The PCMB appreciates the opportunity to provide comments at this phase of your planning. Should the above considerations be taken into full consideration, the Board feels that the potential for cumulative impacts on the herd will be reduced. We look forward to providing more detailed comments as the DLUP begins to take shape and details on the various management tools that will be applied to different IMAs are made available.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joe Tetlich".

Joe Tetlich
Chair