

Recovery Planning  
Environment Canada  
4th Floor, Place Vincent Massey  
351 St. Joseph Blvd.  
Gatineau, QC K1A 0H3

February 22, 2012

**Re: Recovery Strategy for the Woodland Caribou, Boreal population in Canada**

Dear Environment Canada,

The Yukon Conservation Society (YCS) thanks the many scientists, public servants, communities and stakeholders who collaborated to produce this recovery strategy. YCS is pleased to see that the recovery strategy acknowledges that habitat loss from industrial development is the principle threat to Canada's Boreal woodland caribou, and protecting intact habitat is key to their survival. With the active and growing interest in mining and oil and gas exploration in the Yukon, YCS is only too well aware of the current and potential impacts of such industrial activities on habitat and wildlife.

YCS shares the concerns expressed by other environmental groups including CPAWS, Ecojustice and Nature Canada that, despite identifying habitat loss or degradation due to human land-use activities as the primary threat to the survival of boreal caribou, the recovery strategy sets a target of only protecting 65% of the habitat within the range of a local population. This leaves 35% of critical caribou habitat open to disturbance and would result in only a 60% probability of long term survival for local caribou herds. YCS believes a lower level of disturbance should be required to offer Boreal woodland caribou a greater chance of survival.

YCS is also concerned that for the 28 local populations of caribou that are not self-sustaining, the proposed management approach shifts the focus away from habitat protection toward approaches such as predator and alternate prey control. The Yukon has considerable experience with predator control, having conducted extensive wolf killing programs during the 1980s and 1990s in an attempt to increase caribou and moose population numbers. Greatly reducing wolf numbers in defined areas did result in an increase in prey numbers, however once control efforts stopped, wolf numbers quickly bounced back and moose and caribou numbers dropped to pre-control numbers. This experience demonstrated that predator control must be ongoing to be successful, is extremely costly and resource intensive and is very unpopular with the public. Predator control should not be conducted without strong accompanying habitat protection or restoration measures.

YCS urges Environment Canada to remain focused on the strong scientific evidence and amend the recovery strategy to ensure greater protection of undisturbed habitat for the Boreal population of Woodland caribou.

Sincerely,

*Christina Macdonald*

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