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Wek-eezhi Renewable Resources Board
June 10, 2010

Dear Sirs,

In regards to the "Revised Joint Proposal on Caribou Management Actions in Wek'eezhi": Webster's Dictionary defines the word "revise" as "to make a new, amended, improved, or up-to-date version". And this is exactly what the interveners and the WRRB have been presented: a new proposal for managing wildlife in Wek'heezhi.

In addition to the new proposal, there is also a lot of new data, or at least what the Department of Environment and Natural Resources passes off as "data". This information, much of which is misinformation, should be scrutinized and analyzed, not simply rubber stamped as acceptable by the WRRB.

Similarly, the semantics used in the new proposal to dance around the "Total Allowable Harvest" issue would be laughable, were it not for the fact that this whole process is affecting people's livelihoods.

ENR has asserted for the past four years that wolf numbers are down. Now, in this new proposal, it wants to increase the harvest of wolves. What is the evidence supporting this increased wolf harvest? Calf survival for all the caribou herds across the NWT and Nunavut has been between 40 and 50 for the past four years. This is the highest sustained calf survival, over a four year period, ever recorded by ENR. Any wildlife biologist in the world, except for those currently employed at ENR, will tell you that calf survival is the key indicator of predation levels. Given the generally accepted mortality rate of 10% for adult caribou, the recruitment rate per year is a plus 22% for the past four years for NWT caribou. Does the WRRB feel that this growth level should be increased even further, which would be the result of increased wolf harvest? Can the habitat, given the recent level of forest fires, sustain this huge caribou increase?

Given a completely new proposal, and lots of new "data", it is my opinion a completely new hearing must be held. Since this is the fault of the two governments not agreeing on an original joint proposal, I believe that interveners should be compensated fairly for their return to the intervenor table at the new hearings. The Tlicho Government and the GNWT had three long years to come up with a new proposal, between 2007 and 2010. The fact that they couldn't agree on a joint proposal before the WRRB hearing, and now they come up with this last minute proposal, after the hearing has been held, is an absurdity, at best.

ENR has continually refused to provide documents to the interveners, despite its public statement to the contrary. This includes, but is not limited to, collaring information, collared cow mortality rates, age distribution studies, and 8 documents presented to ARC by ENR, which ENR refuses access to, claiming they are still in "draft" form. All of the above information is information the WRRB should be asking for, if it is doing its job properly.

In summation, a new proposal requires new hearings on that proposal. This should include the right for additional interveners, such as the World Wildlife Fund and Defenders of Wildlife, who might be interested in why a data deficient species, such as the NWT wolves, should have an increase in their harvest levels.

Sincerely,

John Andre

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