



29 January, 2019
Mr. Joseph Judas, Chair
Wek'èezhii Renewable Resources Board
4504 49TH AVENUE
YELLOWKNIFE NT
X1A 1A7

Dear Mr. Judas:
Joint Management Proposal for Bathurst Caribou

Thank you for the opportunity to comment on the Joint Management Proposal. The Canadian Arctic Resources Committee (CARC) was established in 1971, and is a well-respected non-partisan, public interest, research and advocacy organization. Composed of citizens committed to environmentally-responsible northern development, support for the rights of Indigenous peoples, respect for the authority of northern territorial governments and increased international co-operation in the circumpolar world, CARC has a reputation for high quality research and public policy analyses, effective public communication and advocacy, and helping to set the public policy agenda.

We would like to raise the following concerns. First, there was only a very brief window of time (1 week apparently) provided to comment on the Proposal, and CARC only learned of it today, the very deadline for the review. We believe this timeline is insufficient for this important issue, the import of the actions to be taken, and the interest and desire of many to have the opportunity to participate in commenting on the submission.

Secondly, herd status, which indicates a greater than 50% decline between the last two surveys, and a reduction of greater than 95% from peak levels, indicates the desperately inadequate management over the past 10 years plus and the need for critical review.

We also note that calling for further identification of critical habitat when there is already considerable knowledge about critical caribou habitat on which to act, and given that there is yet no protection for any of it in the Bathurst range, is procrastination at a time when we can afford none. We were happy to see endorsement of the recommended actions from the Bathurst Caribou Range Plan in the Joint Management Proposal, however there was no clarification on exactly when this plan will be approved and implemented. Unfortunately, there is no time buffer left in which to delay such critical actions as the Mobile Caribou Conservation Measures, offsetting/compensatory mitigation, improved fire management, on-line map staking and others. This is very



disappointing given the years of work and collaboration that went into developing the Range Plan.

Finally, the reliance upon the untested and quite possibly ineffective Mobile Core Bathurst Caribou Conservation Area to control harvest of Bathurst caribou. The statement on page 26 of the Proposal: "*Overall, monitoring by officers and community monitors indicated that few Bathurst or Bluenose-East caribou were taken (based on the locations of reported kills relative to distributions of collared caribou) and that harvest was primarily Beverly and Ahlak caribou with a large proportion of bulls*" is highly biased in favour of positive results when actual data are completely lacking. The fact that protection was known to be relatively less effective given the different distribution of the herd in one year versus another reflects the experimental nature of this management action at a time when the herd can not possibly be more vulnerable to error. Taken in concert with the plummeting population trend to a likely near-unrecoverable level, and the continuing low and possibly declining cow survival rates cited in the Proposal, there is little if any basis for confidence that Bathurst caribou are being rigorously protected from harvest.

With these concerns and recognizing the critical importance of management actions in the immediate future of these herds and the strong public interest in and cultural core need for survival of the Bathurst caribou herd, CARC requests that the Board determine that a Level 3 review of this Joint Management Proposal is required.

Thank you for your consideration of these perspectives and we look forward to your decision.

Please direct any correspondence to:

Mr. Clive Tesar, Policy and Program Director, Canadian Arctic Resources Committee, Ph 613-292-8632, Email: tes.mac@sympatico.ca

Sincerely,

A handwritten signature in blue ink that reads "R. Bromley". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Robert G. Bromley
On behalf of the Board of Directors
CARC