

NATIONAL RIFLE ASSOCIATION OF AMERICA

**INSTITUTE FOR LEGISLATIVE ACTION**

11250 WAPLES MILL ROAD

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**NRA**

January 5, 2010

Grant Pryznyk  
Interim Chair  
Wekeezhii Renewable Resources Board  
Suite 102A  
4504 49th Avenue  
Yellowknife, NT  
X1A 1A7

RE: Bathurst Caribou Proposal

Dear Mr. Pryznyk and Wekeezhii Renewable Resources Board Members:

The National Rifle Association (NRA) appreciates the opportunity to provide comments on the Bathurst Caribou Proposal. On behalf of thousands of NRA members traveling to Canada in order to take part in its great hunting heritage and millions more throughout the rest of North America, we respectfully request your support in maintaining the number of caribou tags set in 2000 and assembling an independent scientific team to gather reliable population data on the barren-ground caribou. This team is necessary to address the faulty data that currently exists.

The NRA always adheres to wildlife management and conservation principles that are biologically justified, which provides for healthy and sustainable wildlife populations. After review of the Northwest Territories Department of Environment and Natural Resources (ENR) data surrounding the Bathurst Caribou Proposal, suspending caribou tags to outfitters is simply not biologically justified. The ENR has publicly admitted the shortfalls and errors in the population data it has collected, citing changes in survey design and timing, weather, adequacy of coverage, missing data, and other ecological variables.

The ENR has largely depended on aerial surveys of the calving grounds of barren-ground caribou and has sporadically redefined a caribou herd using questionable scientific practices in which there are now seven herds divided out from the original four. Aboriginal knowledge has maintained that there is one great barren-ground herd and that migration patterns to the calving grounds change depending on many factors, such as weather. If the majority of the herd travels to an unexpected calving ground on a particular year, the aboriginals knew that the herd had simply gone to another calving ground, not that the herd had gone extinct or that the population had been decimated.

In 2006, there were 5,744 barren-ground caribou harvested and all 5,744 harvested caribou were questionably attributed to the Bathurst herd, which is only one of seven

herds of barren-ground caribou. The ENR has set annual allowable harvest numbers to 4% of herd size, although biologists from Alaska to Quebec use allowable caribou harvest numbers that range between 6% and 7% of herd size. They even include calves of the year in the herd numbers, while the Northwest Territories ENR does not.

Of the 5,744 harvested caribou in 2006, only 769 were from outfitted hunts and it is difficult to understand how eliminating 769 outfitter tags has any impact on the Bathurst herd. In fact, outfitters bring in millions of dollars to the local economies and support hundreds of jobs. In addition, hunters help make the barren-ground caribou a valuable local resource. This advances conservation and ultimately protects caribou and the entire ecosystem in which they live, evidenced by successful conservation models from Africa to Alaska.

The ENR has published virulent anti-hunting propaganda on its website that describes hunters as having "no conservation ethic," "killing indiscriminately," and "killing all of a group" (Bathurst Caribou Modeling Workshop Report 2009, page 16). Nothing could be further from the truth, as the world-leading North American Conservation Model was generated by hunters and is funded by hunters. Hunters take their inspiration from leaders such as Teddy Roosevelt and have been responsible for protecting and preserving millions of acres of viable wildlife habitat across North America. They also contribute countless volunteer hours aimed at advancing wildlife populations. In fact, most objective observers credit regulated hunting for the recovery of many game animal populations throughout the world.

Combining the anti-hunting views to which the ENR evidently subscribes with the questionable scientific practices and data that puts the Bathurst caribou population numbers all over the map, raises serious concerns. An objective, independent scientific team is needed to gather accurate data to help gauge the current health and numbers of the barren-ground caribou and the Bathurst herd in particular. Decreasing and suspending 750 or so outfitter tags is irresponsible and unjustified. It would have virtually no impact on the Bathurst herd, but would devastate the local economy and be an enormous setback for the overall conservation and health of the barren-ground caribou.

Thank you for the opportunity to voice the NRA's strong support for allocating outfitter tags to the numbers that were set in the year 2000 and to assemble an independent scientific team to gather accurate data on the barren-ground caribou. Good science, not anti-hunting politics, is the key to healthy, sustainable caribou populations in the Northwest Territories.

Sincerely,



Lacey Biles

NRA-ILA

Hunting Policy Liaison