08 January 2010

Honourable J. Michael Miltenberger
Minister of Environment and Natural Resources
Government of the Northwest Territories
P.O. Box 1320
Yellowknife, NT X1A 2L9

Dear Sir:

Re: WMAC (NWT) support for the Porcupine Caribou Harvest Management Plan

In light of recent issues concerning the completion and implementation of the Porcupine Caribou Harvest Management Plan (PCHMP); we would like to reconfirm the support of the WMAC (NWT) for the PCHMP as the primary instrument for the management of this shared resource.

The attached letter sent to the working group responsible for developing the PCHMP, and the Porcupine Caribou Management Board details the WMAC (NWT)’s position in support of the Plan.

Yours truly

Larry Carpenter
Chair, WMAC (NWT)

Cc:
Frank Pokuak, Chair, Inuvialuit Game Council
Lindsay Staples, Chair, Wildlife Management Advisory Council, (North Slope)
Joe Tetlichi, Chairman, PCMB
Robert Charlie, Chair, Gwich'in Renewable Resource Board
Richard Nerysoo, President, Gwich'in Tribal Council
Ron Morrison, ENR – Superintendent Inuvik Region
Stephen Charlie, ENR – Associate Superintendent Inuvik Region

Attachment:
- 09 April 2009 WMAC (NWT) letter in support of the PCHMP
09 April 2009

Harvest Management Plan Working Group
c/o Porcupine Caribou Management Board
Box 31723
Whitehorse; YT Y1A 6L3

Dear Working Group Members:

The WMAC (NWT) has reviewed the February 2009 draft of the Porcupine Caribou Harvest Management Plan (the Plan). We wish to express our appreciation for this opportunity to review the plan and to provide our comments on it.

Our understanding of the process for the development of this Plan is consistent with that of the WMAC (NS) as stated in their letter of 31 March 2009 to your working group. Our comments are made in consideration of: the WMAC (NS) comments in their 31 March 2009 letter to you; the provisions of the Porcupine Caribou Management Agreement (PCMA) and the role of the Porcupine Caribou Management Board (PCMB) pursuant to that agreement; and the provisions of the Inuvialuit Final Agreement (IFA) defining the mandate and scope of our Council.

The principle concern of the WMAC (NWT) is that the discussion, conclusions and recommendations in this Plan are based on the use of arbitrary population numbers as benchmarks for changes to management actions when in fact these numbers have no clear biological basis for their use. The little basis there is for these numbers seems to be model projections for which the assumptions and limitations have not been clearly stated. The second concern is that it is known that this herd historically fluctuated in size and that current estimated size of the herd (given the absence of a successful population survey in the past seven seasons) still falls within the boundaries of this fluctuation yet management actions are being recommended that may not be justifiable based on the principles of conservation. Given these two concerns the WMAC (NWT) is of the opinion that the benchmark numbers for management actions (on page 10 of the draft plan) are overly conservative. Specifically the Council positions are:

- The number of 75,000 is an acceptable population size for the implementation of a Total Allowable Harvest (TAH)
- The number for termination of all hunting should be 25,000 vice 45,000. This position is based on the assumption that a TAH will be reduced incrementally before the herd reaches 25,000 and that this will allow for the maintenance of cultural priorities of user groups to the greatest extent possible without jeopardizing the recovery of the herd
- The number for the imposition of voluntary “Bulls only for Aboriginals” should be set at 100,000 vice 125,000. The Council feels that given the historic fluctuations in the herd size 125,000 is too conservative and that 100,000 is a more realistic size to declare the herd as recovered.
The WMAC (NWT) wishes to acknowledge the efforts of the working group to produce the current draft plan. It has required a large amount of commitment and effort on the part of the individual working group members and it is both recognized and greatly appreciated by the Council. In recognizing these efforts by the working group, the WMAC (NWT) believes that the draft plan has progressed as far as possible within the working group and that it should now be presented to the PCMB. The Council does have a number of additional comments on the draft plan with respect to the implementation of management options for the Porcupine Caribou Herd, which we will consider in light of further information on the modeling projections and – in anticipation of a successful population survey this summer – an accurate population number for the herd. However the Council’s position is that any further comments are best directed to the PCMB through the Inuvialuit Game Council in its position as one of the parties to the PCMA.

Thank you once again for the opportunity to comment on this draft plan.

Yours truly,

Larry Carpenter
Chair, WMAC (NWT)

Cc
Frank Pokiak, Chair, Inuvialuit Game Council
Lindsay Staples, Chair Wildlife Management Advisory Council (North Slope)
Joe Tetlich, Chairman, Porcupine Caribou Management Board