

5 November 2020

Wildlife, Lands and Environment

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## LKDFN Position: GNWT & TG's Joint Proposal on Management Actions for Wolves (diga) on the Bathurst and Bluenose-East Barren-ground Caribou (ekwò) Herd Winter Ranges: 2021-2024

Łutsel K'e Dene First Nation (LKDFN) opposes the Government of the Northwest Territories Environment and Natural Resources (GNWT ENR) and Tłıchǵ Government (TG) Joint Proposal on Management Actions for Wolves (Diga) on the Bathurst and Bluenose-East Barren-ground Caribou (Ekwò ) Herd Winter Ranges: 2021 – 2024. We do so citing the numerous reasons we have expressed throughout this process. Based on our Dene values, traditional knowledge, and our review of the science, we believe it to be both inhumane and unnecessary. We believe that the proposal distracts and draws resources from actions that could benefit caribou.

We object to the practice by which the cull would be executed. Wolves hold a sacred place for many people of our community. They are respected co-dependents of caribou, and while some of our people harvest wolves, no one attacks them. The Dene have lived with wolves since time immemorial. Wolves are skillful adversaries and the means by which they are being killed is contrary to respecting animals.

LKDFN has participated in a review of this proposal and a review of material provided to the WRRB. Through this participation we have observed a high degree of uncertainty regarding whether wolf culling measures will lead to caribou recovery. At the most basic level, uncertainty on the number of wolves currently within the wolf incentive area during caribou migration, including a lack of updated data on wolf dens, will mean that we will not be sure as to when cull targets will be met, or exceeded.

If we look at other factors impacting caribou survival rates, however, there exists a stronger degree of certainty. Through research funded by the GNWT as part of the Bathurst Caribou Range Plan (BCRP), as well as other independent studies in other regions, it is evident that linear developments impact both caribou migration and lead to increased predation.

We can't help but lose faith in a proposal that is presented by the GNWT as a "last ditch effort" to save caribou. Meanwhile, the GNWT is also proposing the Slave Geological Province Road Corridor (SGPRC) Project, a project that would create substantial linear infrastructure, further fragment the Slave Geological Province, and open up development for other "significant untapped mineral potential, including several defined large base metal deposits (e.g. IZOK, 15 million tonnes, and Hackett River, 82 million tonnes) and hundreds of base metal and gold showings (372 along current proposed route alone)." (GNWT, 2019)

The Slave Geological Province Road Corridor Study (SGPRCS) multi-criteria evaluation (MCE) and least-cost path (LCP) routing analysis undertaken by Aurora Geosciences (June, 2020) overlaid data from known core caribou range and distribution states with potential corridor routes, and states that:

*“It is important to note that Lockhart Lake Camp exists within the rutting, and winter core ranges for the Bathurst caribou herd and all route options will inevitably travel through these ranges.”*

It is unacceptable to the LKDFN that this proposed wolf cull program would proceed with such a high degree of uncertainty regarding its effectiveness to increase caribou survival rates, while at the same time the GNWT is contemplating development activities that will likely produce significant negative impacts on the Bathurst herd. Such an enhanced measure would be expected for consideration only if all other strategies for improving caribou survival rates were in force.

From an information gathering and engagement process standpoint on, we view the Traditional Knowledge session on Oct 13<sup>th</sup>, 2020 on the wolf management plan with concern. LKDFN expressed this concern in our preamble for the Information Request Round #2, that the wolf management plan itself was never discussed by the facilitators. As is documented in the TG’s response to our Information Request, we were told that this concept was challenging to fully describe and discuss as part of a 1-day “Zoom” video call; and that “it would take a series of meetings to meaningfully discuss and fully develop shared understandings on the subject [the question posed] with Elders.” We agree that it would be challenging to come to insights from Traditional Knowledge on such a large subject in a single meeting. This is why, as attendees eager to hear about the Traditional Knowledge components and contributions to this proposal, we were disappointed that the session was not structured around concrete questions about the contents of the proposal.

The proposed cull is a management tool drawn from another time. It is the wrong approach for Bathurst Caribou in the 21<sup>st</sup> century, who face complex threats to their recovery.

Sincerely,



Beth Keats

On behalf of Glen Guthrie, Wildlife, Lands, and Environment Department  
Łutsel K’e Dene First Nation

Works cited:

Aurora Geosciences. (2020). 2020 SGPRCS Route Analysis Results Technical Report. Prepared for Government of the Northwest Territories.

