

NORTH SLAVE MÉTIS ALLIANCE

PO Box 2301 Yellowknife, NT X1A 2P7



May 15, 2009

Alan Ehrlich
Mackenzie Valley Environmental Impact Review Board
200 Scotia Center, 5102-50th Ave. Yellowknife, NT.
P.O. Box 938, X1A N7

Re: True North Safaris Application for General Wildlife Permit to Bait Bears

This letter is to express our surprise and indignation that the Government of the Northwest Territories' Department of Environment and Natural Resources claims to have "completed a preliminary screening" of the above noted application without any attempt to Consult with the North Slave Métis People, and to bring to your attention several potentially serious concerns the North Slave Métis People may have regarding the proposal to conduct a spring "sport" hunt for bears, on our land, using bait.

The preliminary screening is inadequate in many ways. It fails to identify the:

- ∞ obvious transboundary/transregional implications of the application due to its location in the overlap area between the settled Tlicho D`ene' Land Claim Agreement, and the unsettled land claim area of the North Slave Métis.
- ∞ obvious potential for general public concern about the ethics of spring bear hunting with bait.
- ∞ obvious potential for noise disturbance and nuisance.
- ∞ potential for alteration of the vegetation community, including the potentially serious introduction of invasive species.
- ∞ possible forestry changes,
- ∞ likely disturbances of wildlife and birds while young are being raised,
- ∞ possible population reduction and species diversity changes
- ∞ possible disruption of wildlife behavior and habitat use including concentration in a small area which could lead to wildlife injuries and illnesses
- ∞ obvious potential threats to human safety from injured and/or habituated bears
- ∞ potential for land and resource use conflicts where one aboriginal group, or First Nation, is provided with preferential access to benefits from resource exploitation in comparison to another equally entitled First Nation or aboriginal community.
- ∞ potential to impact historic Métis properties, aesthetically important Métis sites, and Métis archaeological or heritage resources.
- ∞ potential impacts to aboriginal Métis lifestyles and
- ∞ potential impact to aboriginal Métis cultural values

The North Slave Métis Alliance disagrees with the determination of the preliminary screener, that there is no reasonable possibility of significant adverse impacts on the environment. For example:

- ∞ A greater than usual number of bears may be injured in fights when a greater than usual number of bears are attracted to one small area, and a more attractive than usual food source is present. Bear cubs may be particularly vulnerable.
- ∞ Increased bear density in areas with bait could increase the amount of contact between bears, including injured bears, and might lead to increased transmission of disease.
- ∞ The availability of highly attractive food sources in one area may discourage bears from ranging to other areas. Such a disruption of normal movement patterns and spatial distribution might cause habitat degradation for bears and for other species that occupy the same territory as bears.
- ∞ The cut lines which are used to give the shooter a clear view of the bait area may be susceptible to introduced species, potentially carried into the area on the shoes and other outdoor gear of hunters from any part of the world.
- ∞ Hunters are not always able to identify, and avoid killing, female bears. This could leave bear cubs orphaned, and detract from bear productivity.

- ∞ The removal of “trophy” bears might reduce the genetic diversity and quality of the bear population.
- ∞ Bears can become addicted to unnaturally rich baits, and may act unusually aggressive, and/or suffer health effects from an unhealthy diet.
- ∞ Hunters tend to be boisterous and may disturb species other than bears and affect their use of habitat.

In addition, the North Slave Métis Alliance asserts that the North Slave Métis are very likely to have concerns, once they have been provided with adequate information and time to prepare their views, and that some of the concerns that are likely to be identified may be highly significant. For example:

- ∞ Members may feel that hunting bears in spring, when they have just emerged from hibernation and are very hungry, is not very sporting or fair to the bears.
- ∞ Members may not agree with “sport hunting” at all, or may not agree that using bait is fair, or necessary.
- ∞ Members may have a preference for hunting with other methods, such as by using dogs.
- ∞ Members may be upset with the competition of commercial hunters for the best hunting locations.
- ∞ Members will likely be upset that ENR and the WRRB would presume to determine the ethical acceptability of baiting without conducting Consultation with the NSMA.
- ∞ Members may be concerned about the contradictory messages being provided by government to Métis youth. If a fed bear is a dead bear, then how will the number of “fed bears” be limited to only those few bears that will be harvested?
- ∞ Members may be concerned about encountering wounded bears and may have to avoid the area. This applicant has not always assured the retrieval of all wounded animals.
- ∞ Members may also be inclined to avoid the area for fear of being shot accidentally.
- ∞ Fed bears might become nuisance bears, and present safety issues for people in the area, and create a need for problem bear enforcement later on.
- ∞ Members may have a spiritual connection with bears, and object to what they consider disrespectful treatment of bears.
- ∞ The lack of Crown Consultation means that ENR and True North Safaris cannot know where NSMA camps, trails, or areas of current or planned activity are or will be during this spring hunting season.
- ∞ Members may not agree with permitting a second year of baiting after the infractions that occurred last year.
- ∞ Members may have socioeconomic concerns with regards to “white competition” for hunting opportunities, and preferential hiring practices favoring Tlicho D`ene’
- ∞ Members may wish to have a say in the distribution of meat, claws, teeth, galls, hide, and other by-products of sport hunting.
- ∞ Members are very likely to have significant property rights issues, since ownership of the wildlife, and the wildlife habitat, is not established.

All in all, we consider it ridiculous (at best) for this screener to have determined that there was no likelihood of public concern, without even informing the North Slave Métis about the application. We are distraught by the apparent lack of governmental capacity to conduct a thorough and unbiased environmental screenings. We can demonstrate that both ENR and the WRRB were made aware that NSMA had concerns regarding this same application and the consultation process, last year, and should have known that that the NSMA should be consulted. Attached, for example, you will find:

- ∞ a copy of the email sent by me on the 9th of June 2008, on behalf of the NSMA, to the Wekezhii Renewable Resource Board and to ENR, asking for information about the General Wildlife Permit for this same bear baiting application and the respective consultation policies and practices of each agency.
- ∞ a copy of an email from Rob Marshall to me further to our meeting of June 20th, 2008 to discuss our concerns regarding the issuance, without consultation, of General Wildlife Permits for bear baiting, in the same area, and to the same applicant.

The North Slave Métis Alliance submits these very preliminary comments, on short notice, as the elected political representative of the indigenous North Slave Métis People. The jurisdiction of the North Slave Métis Alliance applies to Métis Rights, including Aboriginal Rights and Titles and Treaty Rights throughout the area which lies between Great Bear Lake and Great Slave Lake, from the Mackenzie River to Contwoyto Lake. The North Slave Métis have shared their homeland with bears for many generations, and have practiced bear management since long before Europeans established effective control over bear management in our territory. The Constitution of Canada guarantees our right to continue doing so.

Sincerely,

Sheryl Grieve
Manager, Lands and Resources
lands@nsma.net

From: Sheryl Grieve [lands@nsma.net]
Sent: Monday, June 09, 2008 6:36 PM
To: 'Rob Marshall'; 'ernie_campbell@gov.nt.ca'; 'Robert_Redshaw@gov.nt.ca'
Subject: Bear Baiting and Consultation

Hi Rob, Ernie, and Rob,

I recently found out, incidentally (through the documents submitted along with True North Safari's Land Use Permit Application), that True North Safaris has applied for, and obtained:

- A new General Wildlife Permit from ENR, providing permission to hunt bears with bait. (#GW014897)
- A new Tourism Operator Licence covering the North Arm (#200211) (New, since it was issued 24 days after the previous Outfitters Licence expired.)

I would appreciate a copy of the application for both of these regulatory authorizations, and a copy of your consultation policy with regards to both.

From the WRRB I would like all the documentation of the process, by which official support for the practice of bear baiting was approved. What is the WRRB procedure for consulting with First Nations regarding wildlife policy issues, as well as specific management decisions?

I'd appreciate as much information as you can provide, thanks.

Sheryl Grieve B.Sc.
Environment and Resource Manager
North Slave Metis Alliance
32 Melville Drive.
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From: Sheryl Grieve [lands@nsma.net]
Sent: Monday, June 23, 2008 1:36 PM
To: 'Rob Marshall'
Subject: RE: Bear baiting application - additional information

Thanks Rob.

Sheryl Grieve B.Sc.
Environment and Resource Manager
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From: Rob Marshall [mailto:execdirector@wrrb.ca]
Sent: Friday, June 20, 2008 1:34 PM
To: Sheryl Grieve
Subject: Bear baiting application - additional information

Hi Sheryl,

As promised at this morning's meeting, I have looked through my Board meeting Minutes and can tell you that there was not a written memo prepared by staff for the Board when they discussed this application. The information I provided to you in the package is all we have and is what the Board used to make its decision.

Regards,

Rob Marshall
Executive Director
Wek'eezhii Renewable Resources Board
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