



# Valhalla Wilderness Society

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December 31, 2015

Dan Peterson - Director, Fish & Wildlife Branch  
PO BOX 9391  
STN PROV GOV'T  
VICTORIA BC  
V8W 9M8

Dear Mr. Peterson:

**Re: Proposed grizzly bear hunting increase in MU 7-52 and increased provincial hunting and wolf trapping**

The Valhalla Wilderness Society (VWS) is appalled that the Ministry of Forests, Lands and Natural Resource Operations (MFLNRO) is proposing to triple the number of limited entry hunt (LEH) permits for resident hunters to kill grizzly bears in MU 7-52, a remote area in the Peace, and to lift the limitations on the number of wolves that hunters can kill in the Kootenays, the Peace, Thompson-Nicola and Omineca. The proposed changes would also allow hunters to kill wolves year round, including when pups are in the den, and trappers to trap wolves on private land.

**1.0 Proposed tripling of LEH grizzly permits in MU 7-52 for resident hunters**

We found that the website should have included a detailed map of MU 7-52 and its relationship to whatever GBPU it is part of. We spent approximately one hour trying to sort this out from the different government websites to determine that MU 7-52 appears to overlap with the Muskwa Grizzly Bear Population Unit (GBPU).

Our review has concluded that the rationale provided for this proposed tripling lacks any solid scientific basis. Your Ministry does not have accurate population numbers of grizzly bears notwithstanding its claim of precisely 459 bears in MU 7-52 based on population modeling. BC grizzly bear population estimates are notoriously inaccurate and include subjective assumptions and wide margins of scientific error that are not reflected in the misleading estimate of 459 bears. In addition to this very crude and misleading "guestimate", the rationale on the web site failed to provide the public with adequate information that would enable them to make a fully

informed decision. The missing database or lack of adequate background includes but is not limited to the following:

- No info. on the number of non-resident LEH permits issued annually;
- No info. on the number of grizzly bears killed by non-resident hunters annually;
- No info. on the number of reported and estimated unreported human-bear conflict kills in MU 7-52 per annum.

Bear biologist Wayne McCrory (RPBio), also a VWS director, studied grizzly bear-ungulate hunter conflicts in part of the Muskwa-Kechika area for the Wildlife Branch (McCrory 2003) and found a high rate of grizzly bear-hunter conflicts, including numerous incidents of negligent practices by resident ungulate hunters and by the guide-outfitters. In this regards, BC grizzly bear population estimates and the determination of hunting quotas involves necessary but often unsubstantiated guesses at the number of unreported grizzly bear human-caused mortality. A review of 13-radio-collaring studies in a 22-year period, including southern British Columbia, showed that people killed 77-85% of collared bears known or suspected to have died (McLellan et. al. 1999). Our experience is that the Wildlife Branch most often does not attempt to more accurately determine unreported mortality other than their standardized guesswork done by the management biologist for the MU. According to bear biologist Wayne McCrory (pers. comm.), when he recently used interviews with a local guide-outfitter, First Nations, ranchers and local residents for the northern portion of South Chilcotin GBPU he found that unreported human-caused mortality was considerably higher than that used by the Wildlife Branch as estimated from conservation officers and others. Our experience is that the Branch's common underestimate and lack of hard data on unreported human-caused mortality in MUs poses a significant risk of overkill from legal hunting followed by population declines. This is not taken into consideration in the proposed MU 7-52 grizzly hunt increases.

We would like to bring to your attention that a peer reviewed study by Artelle et al. (2013) shows that MU 7-52 has already had, under a more conservative hunt quota, one period of over mortality between 2001 and 2011. During this over mortality period, too many grizzly bears including females, were killed in the Muskwa GBPU, likely resulting in a long term trend in declining population numbers. Given that your Ministry does not have accurate population numbers and accurate data on unreported kills such as poaching and unreported hunter-grizzly conflict kills from such a remote, unpatrolled area, that instead of increasing the hunt, the Artelle et al. study underscores that hunting targets should be reduced by 47% to 81% on average to compensate for the afore-mentioned uncertainties and to prevent excess mortality. In light of this, proposing to increase LEH permits is contrary to sound science-based wildlife management and reflects the Branch's trend to continue to cater to a small vested interest hunting lobby instead of making conservation of grizzly bear populations a higher priority.

In remote areas with a history of negligent practices by hunters and guide outfitters, like MU 7-52, VWS also calls on the government to increase monitoring and enforcement staff and their budget to minimize these egregious practices against one of BC's most iconic animals.

Because of the fragile nature of grizzly bear population dynamics combined with the well-recognized uncertainties of your provincial population estimates and flawed hunt management, as well as for ethical reasons, the majority of British Columbians, including the Valhalla Wilderness Society, are opposed to the grizzly bear trophy hunt. It is no small wonder that after a careful scientific review over a decade ago that the European Union imposed a ban on the import of grizzly bear trophies from BC.

## **2.0 Proposed increases to hunting and trapping of wolves**

The rationales provided for the proposed hunting and trapping increases in the Kootenays, the Peace, Thompson-Nicola and Omineca also lack any scientific basis given that your Ministry does not have accurate population numbers of wolves in BC. Policy decisions should never be based on speculative and anecdotal

observations about wolf population numbers, let alone numbers provided by vested interest groups, including hunters and trappers.

Hunting and trapping wolves year round is cruel and inhumane, as killing mothers while their pups are in dens can result in the pups starving to death. Yukon wolf biologist and former predator control manager, Bob Hayes categorized open season hunting as “ethically wrong” (<http://thetyee.ca/News/2014/06/06/BC-Wolf-Killing-Plan/>). Hunting during denning season was also opposed by the BC Trappers Association as being inhumane.

Killing wolves with traps and snares is grossly inhumane. Regardless of the reputed “humaneness” of certain kinds of traps, BC trapping regulations require wolf traps to be checked only once every 14 days. Wild animals can suffer in agony for days before the traps are checked: some trapped animals have even gnawed off the trap portion of their bodies in an attempt to liberate themselves.

BC allows the use of killing snares on wolves and most other fur-bearers, which can cause horrific suffering. These snares do not meet the standards of the Agreement on International Human Trapping Standards, but are allowed in Canada through a loophole in the law. The snares can cut into the necks or bodies of animals while strangling them, and the victims have often been found alive the next day or days after being caught in the snare.

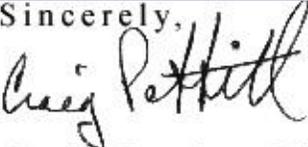
VWS calls on the BC government to stop scapegoating wolves: there is widespread scientific consensus, including among government biologists, that the main causes of caribou declines are loss and fragmentation of habitat by industry and displacement from critical winter feeding grounds by motorized recreation. Killing wolves in BC and in Alberta has not resulted in increasing caribou populations and is a huge waste of tax payers’ money that should be directed to establishing parks and restoring mountain caribou habitat.

### **Deeply flawed “pubic consultation process”**

If the BC government truly wanted public input – and not just pander to its preferred hunting constituents it would have widely advertised the proposed changes and provided fully accurate instead of piecemeal information. It also would have invited public feedback over a much longer timeframe and not over the busy holiday season.

The process is further undermined given that not all proposed changes have been posted at the same time. Contrary to your Ministry’s promise that proposed changes posted at a later date would be given the same timeframe for public feedback, the timeframe for the proposed changes to moose hunting in the Peace Moberly tract, for example, is only two weeks.

Could you please explain why proposed changes to snowmobile closures in the South Selkirks and South Purcells have been posted under these proposed changes to hunting and trapping regulations?

Sincerely,  
  
Craig Pettitt, Director  
Valhalla Wilderness Society

Cc:

Hon. Steve Thomson, Minister of FLNRO  
Hon. Mary Polak, Minister of Environment,  
Mr. Tom Ethier, Assistant Deputy Minister, MFLNRO  
Mr. Chris Ritchie, Fish and Wildlife Recovery Implementation Manager, MFLNRO  
All MLAs

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