

December 21, 2009

Sheryl Grieve
Environmental Branch Manager
North Slave Metis Alliance
Box 2301
Yellowknife, NT, X1A 2P7

RE: Bear Baiting Operation – True North Safaris Ltd. (NS2010GWP001)

Environment & Natural Resources (ENR) North Slave Regional Office would like to thank you for your letter dated November 6th, 2009. In order to make our final Preliminary Screening (PS) decision, we have conducted an assessment of the activity by analyzing concerns with respect to the General Wildlife Permit application, including your specific concerns of:

- 1. How will the NSMA be involved in monitoring and enforcement, future review of the success, failure of permit conditions in achieving conservation and human safety goals?***
 - ENR will be providing a report to the WRRB and will share with the NSMA.
- 2. Increased bear density in areas with bait. All wildlife management decisions should be based on a comprehensive and up to date wildlife data and information.***
 - ENR will be conducting a literature review as a background for the Black Bear Management Plan, which will include information on population density and monitoring. ENR will share the plan with the NSMA.
- 3. Negativity publicity for the region, and the NWT related to the controversial practise.***
 - The proposed activity is allowed under the Wildlife Act if the proper permit is obtained.

4. *Members may be upset with the competition of commercial hunters for the best locations.*

- The proponent does not have exclusive rights to the area.

5. *Communities should be directly involved in major decision making in relation to wildlife management issues in their traditional area.*

- The Department of ENR is consulting with aboriginal organizations as required under the Preliminary Screening process.

6. *This outfitter does not have an Impact Benefit Agreement with the NSMA.*

- This proposed activity does not require an IBA.

7. *Community perception that it is too dangerous to fish or pick berries in area where baited and potentially wounded bears may be and where there is the potential to be accidentally shot.*

- There are no berries or fishing in the area where the activity will occur during the period of operation.

8. *Bear cubs may be orphaned, and bear productivity may be reduced.*

- ENR feels that the concern can be mitigated within the proposed terms & conditions of the permit.

The Permittee shall harvest male bears only.

9. *Habituated bears may become addicted to unnaturally rich baits.*

- ENR feels that the concern can be mitigated within the proposed terms & conditions of the permit.

The Permittee shall ensure that the bait consists only of unprocessed fats and meat, oats, corn, fish and fish parts and other natural foods normally found in the nature of the surrounding area, North Slave Region.

10. *Disruption of normal movement patterns and spatial distribution. Changes in wildlife behaviour and habitat use, including unnatural concentration on an area.*

- ENR does not anticipate any disruption of normal movement patterns from this activity.

11. Reduced genetic diversity.

- ENR feels that the concern can be mitigated within the proposed terms & conditions of the permit.

The Permittee shall ensure that no more than 14 bears are harvested.

12. Reduced value of landscapes, objects or sites in the area that have heritage, cultural or historic importance to the Metis. 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.

- ENR requests that the Metis identify areas of importance with the proposed operating area so that they can be considered within the terms and conditions of the permit.

ENR has completed an assessment and determined that the application for a General Wildlife Permit to bait black bears, not be referred to an Environmental Assessment (EA) as per Section 126 (2a), as the development of a Black Bear Management Plan and the proposed Terms & Conditions will mitigate these concerns.

As per Section 126(3) of the Mackenzie Valley Resource Management Act (MVRMA), the decision and reasons for the decision will be sent to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) for their review and to make a decision as to whether it should be referred to EA on its own motion.

After MVEIRB has completed their review and if it is determined that the application will not be referred to an EA, a management proposal will be sent to the Wek' èehzii Renewable Resource Board (WRRB), by January 2010. A final decision about issuing a permit will be made by the Superintendent under the Wildlife Act.

If you have questions or concerns please contact Sarah True, Regional Environmental Assessment Coordinator, North Slave Regional Office at (867) 873-7443 or email sarah_true@gov.nt.ca.

Sincerely,

Lance Schmidt
North Slave Regional Superintendent
Environment & Natural Resources

CC.
Gary Jaeb
True North Safaris Ltd.

Vern Christensen
Mackenzie Valley Environmental Impact Review Board (MVEIRB)