

Valhalla Wilderness Society

Box 329, New Denver, British Columbia, Canada V0G 1S0

Phone: (250) 358-2333, Fax: (250) 358-7950, E-mail: vws@vws.org, Web: <http://www.vws.org>

June 4, 2008

Heather MacRae
Integrated Land Management Bureau
#200-1488 4th Avenue
Prince George, BC V2L 4Y2

Re: File #7408074

Rocky Mtn. Adventures application for hunting camps on the Morkill River

Dear Ms. MacRae:

The Valhalla Wilderness Society, composed of hundreds of members throughout the province, is strongly opposed to the application of Rocky Mountain Adventures for three hunting camps along the Morkill River. There should be NO cabins along the river. Our concerns include:

- 1) Increasing public interest in the Morkill River for the enjoyment and preservation of inland temperate rainforest and associated wildlife.
- 2) Cumulative and increasing human impacts along the Morkill River and indirect impacts upon the surrounding Walker Rainforest Wilderness.
- 3) Threats to wildlife from the expansion of a commercial operation that kills black and grizzly bears, cougars, wolves, mountain goats, moose, and deer, using horses, ATVs, 4WD, boats, and bikes, as well as blinds and trees.
- 4) Additional threats to grizzly bears from human conflict with the intrusion of three cabins into their habitat.
- 5) With expanded structures comes expanded use and expanded commercial operations. Past experience with commercial tourism shows there is a strong potential that the three cabins could turn into 4-seasons commercial tourism use, perhaps with helicopter access, and form the basis for future expansion proposals for larger tourism lodges that will further displace and kill wildlife and destroy natural values sought by many other members of the public.

In summary, the Morkill River is needed for the preservation of wildlife and for public, noncommercial recreation. Hunters should have to return to base camp at night or camp out like everyone else. We are not opposing commercial recreation, or even opposing Rocky Mountain Adventures, though with further investigation perhaps we would. We are only saying that structures should be kept out of the Morkill watershed. We also believe it would be sheer

stupidity and greed on the part of the government to put three cabins for hunters in what is some of the best remaining habitat for the endangered mountain caribou — especially after the current government has decimated our conservation officers.

Proposed tourism development will add to the cumulative damage already caused by logging and hunting

Two directors of the Society recently visited the area. While it was impossible to get very far up the Morkill River at this time of year, it was evident for all to see that there has been a vast amount of fragmentation by logging in the Robson Valley, and that this damage extends into the Morkill Valley.

Both the Rocky Mountains and the Cariboo Mountains have extensive protection in the form of large parks. However, there is little old-growth connectivity between these mountain ranges because of extensive clearcutting in the Robson Valley. There are no parks large enough to protect large, wide-ranging wildlife in the upper part of Robson Valley. The old-growth management areas and “caribou high” areas in the Robson Valley are not fully protected. The Kakwa Provincial Park contains only about 12,000 hectares of Sub-boreal Spruce and Interior Cedar-Hemlock forest in a 172,396-hectare protected area, indicating a park that is largely high elevation alpine and subalpine habitats. (1)

The Morkill River links the Rocky Mountains and the Robson Valley. Protected or unprotected, it is currently intact enough to represent critical old-growth forest connectivity that links to the much smaller West Twin Park, reaching partially towards the Cariboo Mountains. As such it has huge importance to wildlife.

Our concerns extend, not only to the immediate area where the three cabins would be built, but also to the core wilderness around them. A 2000 study by the Ministry of Environment, Lands and Parks identifies the amount of forested riparian areas that has been logged in the last 20 years as a key indicator of ecosystem health of watersheds, because the forested riparian zone is transitional between water and land and it has the greatest biodiversity. Only 11.7% of BC forestland is riparian area (within 30 m of the centrepoint of a stream.) The study shows that 15.6% of the forested riparian zone along the Morkill had been logged by 2000, mostly by clearcutting. (2) The 30-metre zone obviously represents only a small fraction of the actual size of the clearcuts. Three hunting camps in the watershed, including two on the river and one up Forgetmenot Creek, will compound the human impacts.

Food-rich areas, usually in low- and mid-elevation habitats, especially riparian habitats, can be death traps for grizzly bears if it brings them in contact with people. This has been proven with logging roads, and it has been shown that whether roads are well used or not very much used also makes a difference in whether grizzly bears are displaced. (3) It is also notoriously known that this occurs with cabins.

We understand there is no hunting of grizzly bears along the Morkill River, but even if the camps were for hikers or children, they would increase the risk of conflict with humans that could result in increased grizzly bear deaths. Whether or not Rocky Mountain Adventures takes the garbage

away frequently will make little difference if the grizzlies come through the cabin area traveling the riparian corridor looking for their natural foods. A study done on grizzly bears in the Robson Valley included two bears from the Morkill/Forgetmenot drainages. The results indicate that bears in this drainage make considerably more use of forest than in other areas (4):

“The Morkill/Forgetmenot bears generally avoided the alpine. The likely reason for this avoidance is that the area has very few avalanche chutes, and the alpine is primarily a dry ridge. Lush alpine bowls were uncommon, but were used where present. These bears were located primarily in a mix of clearcuts and the surrounding mature spruce and balsam forest ...”

The impacts of the three cabins will not be confined to their immediate vicinity. A visit to the website of Rocky Mountain Adventures indicates that they have an outstanding and productive operating area that has killed much wildlife *without having three hunting camps along the river*. They also state that some of their guide territory has never been hunted. We imagine that is likely due to long distances that have to be traveled from base camp. We also believe it is likely that the success of their operation depends a great deal upon maintaining a core wilderness area where the grizzlies are not be hunted, or are hunted seldom because of access constraints. The unhunted area, then, maintains the pool that constantly replenishes what man takes. With the high grizzly bear mortality connected to logging, in addition to the hunting, humans takes a lot from the grizzly bear population.

A study carried out north of the Robson Valley, in the Parnsip River watershed and adjacent areas west of Monkman Park, showed that grizzly bear density in the logged areas of the plateau was only one-quarter of the grizzly bear population density in the mountains where less logging had taken place. (5) The scientists believed this was because of displacement and increased human-caused mortality of bears that is associated with roads. They stated:

“As timber harvesting activities move further into the mountains, mountain bears will be subjected to more of the risks operating on plateau landscapes if human access is not properly managed ... We predict that if our current system of forestry management continues, and logging roads remain accessible to the public after the timber has been extracted, the number of bears will decline. We suggest that for grizzly bears to remain viable outside of protected areas, we must maintain places *secure from the risk of human-caused bear mortality* across each landscape.”

The Morkill Road itself is a liability to wildlife without deliberately loading it with people with guns and making it more comfortable for them to stay along the road and in the riparian area.

Recreational and conservation interest in the Morkill has greatly enlarged because of the existence of ancient inland temperate rainforest in this watershed.

As you may be aware, the Save the Cedar League, based in the Robson Valley near the Morkill River, has proposed the Walker Rainforest Wilderness, including the Morkill River, for a fully protected park. The Valhalla Wilderness Society has identified it as one of the three most important areas for the protection of inland temperate rainforest in the province. Sites along the

Morkill River are featured in the Ecoguide produced by the Save the Cedar League. People will be coming there to view the ancient forest, hoping to catch a glimpse of wildlife — especially grizzly bears. Whether people come to fish, see the ancient forest, or watch for wildlife, the river and its road will be a focal point for them. No part of it should be locked up by private commercial interests for cabins. The least that can be done for wildlife is to stop the logging and keep human structures out of it.

In summary, despite some clearcutting and the intrusion of the road, the area is one of the last remaining strongholds of our large wildlife and should be managed for protection. It is a magnificent wilderness recreation resource and should be managed for *ALL* the people. If all recreationists are going to enjoy it, we must *ALL* forbear from having private cabins. The proposal by Rocky Mountain Adventures is just one example of the tendency of businesses to continually expand onto public lands that then become privatized. Three hunting camps in the Morkill will lead to bigger business and even more expansion in the future for Rocky Mountain Adventures while the wildlife and the rest of the public face diminishing prospects as the wilderness diminishes and increased human impacts crowd in. We request that you deny the permit for all of the proposed cabins.

Sincerely,

Anne Sherrod
Chair

- 1) Nash, M., “Kakwa Provincial Park Background Report,” BC Parks, Oct. 26, 2001.
- 2) BC Ministry of Environment, Lands and Parks, “Environmental Indicator 2000: Riparian Ecosystems of Forest Land,” <http://www.llbc.leg.bc.ca/public/PubDocs/bcdocs/326823/2000Suppl/11-forest-techdoc.pdf>, 2000.
- 3) Ciarniello, L., et al., “Components of Grizzly Bear Habitat Selection: Density, Habitats, Roads, and Mortality Risk,” *J. Wildlife Mgmt.*, 71(5):1446-1457, 2007.
- 4) Seip, Heard and Wolowicz, “Robson Valley Grizzly Bear Habitat Use,” for the Robson Valley LRMP process.
- 5) Ciarniello, et al., “Denning behavior and den site selection of grizzly bears along the Parsnip River, British Columbia, Canada,” *Ursus*, 16(1):47-58, 2005.