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VWS Submission to the BC Government on the Draft Grizzly Bear Stewardship Framework

The Valhalla Wilderness Society (VWS) has successfully protected six large wilderness parks, three of which were specifically designed to protect grizzly bears. (Goat Range Provincial Park, Khutzeymateen Grizzly Bear Sanctuary, and the Spirit Bear Conservancy). VWS is aware that more measures, such as dramatically increased protected areas, grizzly bear corridors, a reduction in the allowable annual cut, increased retention in forestry, and closure of roads are needed.

The 2020 strategy paper for Together for Wildlife promised some good things, but was highly flawed by the intent to achieve these actions through the creation of local and regional advisory committees. This proposed approach has been mostly on paper or in talks, while action on the ground has, to our knowledge, been very limited.

In June 2021, VWS sent to the Ministry of Forests (MOF) and Ministry of Environment and Climate Change Strategy (MOE) a report entitled “How human-centered exploitative wildlife management in BC has increased the damage done by habitat destruction.” In that report we focused a great deal on the mounting cumulative effects of human activity on wildlife, including hunting. The report also criticized the Together for Wildlife program, and cited cases of existing local wildlife advisory boards that were heavily focused on hunting, trapping and predator killing.

VWS is sorry to learn that once again the MOF has issued another “Together for Wildlife” report, the **Grizzly Bear Stewardship Framework**, and started an engagement process that offers no definitive action on the ground — this six years after the Auditor General’s 2018 and 2021 reports criticizing the lack of action on the ground. The Auditor General’s reports did not recommend these committees.

The Stewardship Framework asks the public to review an information package for local and regional advisory committees whose make-up, goals and terms of reference are kept in the dark. The title “Stewardship Framework” led us to believe that the report would provide a policy framework, and reveal how the committee members would be selected; we expected to see a “terms of reference” that would define what the committees could and could not do. This would be essential for accountability. Instead the term “framework” is simply a compendium of information on grizzly bears and grizzly bear management techniques.

One puzzling aspect is that we are told that “wildlife” advisory boards will be set up, yet the Stewardship Framework is specific for grizzly bears only. This is all ironic because goal 5 of the Framework is to “inform, educate and be transparent and open about grizzly bear stewardship” with the public. It is anything but transparent, and it exacerbates the appearance that the province is in a hurry to reverse the closure of the licensed grizzly bear hunt.

When “Together for Wildlife” first began, the initial strategy paper cited stewardship functions that the committees might perform that were relatively innocuous, such as eliminating non-native plants or helping to restore wetlands. But in the Grizzly Bear Stewardship Framework, committees with vested interests could control functions critical to the survival of grizzly bears, such as creating a recovery plan for the bears. **The BC government appears to be on track to decentralize and privatize the management of our wildlife that will effectively disenfranchise the conservation voice of the majority of British Columbians.**

Why are we getting a “Stewardship Framework” instead of a grizzly bear management plan as required by the Species at Risk Act (SARA) and recommended by the Auditor General? A management plan on both the species and its habitat was required to be filed on the SARA Registry 3 years after grizzly bears were listed. Now about 6 years has passed. We learn that in 2020 MOF told the Select Standing Committee on Public Accounts that “Much

of the technical/scientific background and content of the management plan has been drafted, and broad objectives for grizzly bear management have been identified internally by ministry professionals". Where is it? If a plan with management objectives has already been drafted, why is the Ministry of Forests instead releasing a Stewardship report that has no real objectives and makes no commitments about grizzly bear management? The draft management plan now appears to be superseded and rendered irrelevant by the assignment of critical functions to a system of yet-to-be-implemented local and regional boards.

DETAILS

Section 1: GOALS OF THE STEWARDSHIP FRAMEWORK

1. **The Framework has NO stated goal to protect or conserve grizzly bears.** This is a glaring omission because grizzly bears are federally listed as Special Concern and 65% of Grizzly Bear Population Units (GBPUs) are ranked moderate, high or extreme conservation concern. Three units are extirpated. Eight units that are rated high concern are also highly or totally isolated. Two units are moderately isolated units that are rated high concern are also highly or totally isolated. Two units are moderately isolated.
2. **The Framework has NO commitment to conservation actions** such as creating connectivity corridors, reducing the allowable annual cut of logging, creating new parks, or a plan to reverse the decline of salmon. A number of scientific panels have said that BC must increase fully protected areas to 50% to maintain grizzly bears over the long term. Currently, most of the province has only 12-17% protected. The draft Framework does say that the government has promised to protect 30% of the province, but it does not put that in a Terms of Reference or policy framework.

Sections 2-3 - CONSERVATION STATUS OF GRIZZLY BEARS

1. We're told that the grizzly bear is a SARA Species Special of Concern, but we are trying to understand how it can be managed in accordance with the laws of the *Species at Risk Act* by splitting up decision-making among numerous citizens' advisory committees. **The plan for the committees appears to be an end-run around the *Species at Risk Act*.**
2. **These committees would splinter wildlife management decisions into smaller jurisdictions.** The argument advanced by the government is that "no one size fits all": different areas need different grizzly bear management. But this is deceptive. Because grizzly bear populations need different management techniques does NOT mean they need to be subjected to a local and regional lottery for who is going to make management recommendations. The MOF and MOE already have a system of managers and biologists at the regional level to provide local and regional advice. This massive and expensive public process machinery is occurring at the expense of MOF and MOE hiring sufficient staff to protect wildlife.

Section 4: SERIOUS CONSERVATION CONCERN

The Stewardship report does provide useful information that validates why the bears are listed Special Concern. However, the seriousness and uncertainty of this information is understated.

1. **Field inventory of populations still lacking.** The draft Framework mentions a small amount of progress on field inventory of BC's grizzly bear populations. However, the table on page 11 indicates that by far most population inventory is still by computer modeling and the opinion of Ministry of Forests biologists. This is the same system that was used to allow grizzly bear trophy hunting, and its accuracy was hotly disputed by many independent, expert grizzly bear biologists and questioned by the Auditor General's report.
2. The Executive Summary of the Stewardship Framework states: "There is no evidence of a decline in the overall population during the past 30 years, *though most populations lack adequate abundance data to detect changes in population trend.*" In other words, there is also no evidence that the overall population hasn't declined.

3. The map of Conservation Ranking of various GBPU's that is referred to in Appendix A of the Stewardship report shows that nine GBPU's near the southern border are either highly or totally isolated. It is well known in Conservation Biology that fragmentation and isolation is a precursor to extirpation.

Section 6: THREAT INFORMATION IS INADEQUATE FOR ADVISORY BOARD DECISION-MAKING

In the face of the hugely destructive forces facing all our wildlife species, the Stewardship Framework shows a substantial disconnect from the reality facing our wildlife.

1. **Climate change threat is understated.** Out of 66 pages the Stewardship report has a three-paragraph section on climate change. The title of the section reads "Climate change & severe weather (estimated to be Negligible or Low for individual GBPU's)." We find that estimation to be shocking.

The report suggests that grizzly bears may be more resilient to climate change than other species. That is highly speculative, but whether the bears are more resilient than other species or not, they still face huge impacts to their food, denning and reproduction.

The threats described in the report include the loss of salmon, but it suggests that bears can eat berries when they don't have salmon. What happens when drought causes the berry crop to fail? We are seeing headlines like this:

Feb. 2023 – "Central coast chum abundance declined 90% since 1960.

August 2022 – "BC is facing a steep decline in sockeye salmon".

August 2021 – "85% of BC's lower Fraser salmon habitat no longer accessible to declining fish populations."

Salmon and grizzly bears feeding on them go deep into the interior of BC as far as the vicinity of Prince George and Quesnel Lake. In addition, grizzly bears in southeastern BC have currently lost land-locked Kokanee salmon runs. BC cannot lose fish on such a massive scale and just theorize that the bears can eat berries. The Stewardship report acknowledges that there are already starving grizzly bears on the coast.

The report suggests that the new climate change regime of forest fires might be beneficial for grizzly bears. The Ministry may want to revise that speculation right away.

2. **Threats to grizzly bears from logging are diminished.**

- a. The report greatly underrates the value of old forest 80 years old or more to grizzly bears. Out of 5 categories of value, old forest receives a rating of only one. From much research, Valhalla Wilderness Society biologists know that older-aged forest provides important habitat for grizzly bears, including den trees, connectivity, thermal cover and important plant foods. Older forest on the coast provides some of the best grizzly habitat. According to the province's own Cumulative Effects report on Howe Sound, clearcutting forested areas adjacent high quality grizzly bear feeding sites can adversely affect their suitability as preferred high value feeding sites.
- b. The destruction of old forest by logging is the reason why logging roads are one of the most serious sources of grizzly bear mortality. The 2017 Auditor General's report stated that:

"There are 600,000 km of resource roads with on the order of 10,000 km more added each year. This expansion allows greater human access into wilderness areas, which results in increased illegal killing of grizzly bears, and greater human-bear conflicts."

The Ministry of Forests' Stewardship report recommends closing some resource roads, but does not mention cutting down on the building of new roads **by reducing the allowable annual cut and protecting loggable forest.**

- c. Ongoing logging of old-growth forest is a significant contribution to the climate change that endangers grizzly bears and all our wild species in many ways. Poor logging and road building standards have been a major contribution to the decline of salmon.

4. **Threats to high elevation habitat by BC's Resort Strategy should be added to the report.** The Ministry of Forests has set up a Mountain Resorts Branch (MRB) specifically mandated to create and expand four-season resorts with ski hills. In BC the terrain for such a ski resort will often equate to prime grizzly bear habitat, with bears denning on high-elevation mountain slopes, digging for corms and grounds squirrels and feeding on berries. The MRB recently approved a massive ski development near Valemount, between Wells Gray and Mt. Robson Provincial Parks, that will most likely impact grizzly bears. Now another new ski town is proposed adjacent to the boundary of Goat Range Provincial Park. The proposed Banff-style village now threatens to become a fatal attractant to the park's grizzlies and those in a broad swathe around the development. Two grizzly bear experts have told the government that the resort will totally sever the gene flow needed to maintain the genetic health of the smaller population north and south of Kootenay Lake.¹

Sections 9 and 10: RECOMMENDED STEWARDSHIP ACTIONS

Section 9.1, "Recommended Stewardship Actions" is only one paragraph long and contains no recommended stewardship actions. Mostly section 9 is a compendium of functions that the government is already doing, such as population calculations and monitoring, recording human-caused mortalities, etc. Where there are actual recommendations, they seem to be directed at the province continuing to perform these functions. Our review focused on recommendations to the local and regional advisory committees, but we only found a description of potential management tools the committees could use.

These committees are to include industry, environmental organizations, independent biologists, and other stakeholders, local government and Conservation Officers. A local plan could be "a few population and habitat objectives" or "a recovery plan" or a "State of Value" reports. So our Village Council is now expected to help create a Grizzly Bear Recovery Plan!!! *Our tax dollars are supposed to pay the government to do wildlife planning with expert professionals.*

The Framework encourages planning teams to "consider" such things as "The accuracy and uncertainty of grizzly bear population size." The government's own biologists already know the answer to the accuracy of its different populations estimation methods. All this projects a picture of the future BC government as merely an information generating agency, while citizens' committees decide what to do with the information. This portends the abandonment of government of any responsibility to protect, conserve or manage the bears.

Section 9.9 – HUNTING: THE LICENSED HUNT SHOULD REMAIN CLOSED.

The Stewardship Framework states that BC's closure of licensed grizzly bear hunting "was not specifically or directly in response to a conservation concern. Rather it was largely a reflection of many British Columbians' ethical or moral opposition towards grizzly bear hunting". *This is misleading*; there was at that time, and there still is today, a lot of conservation concern about grizzly bears and the sustainability of the hunt.

- 1) Grizzly bears had been blue-listed in BC since 1999; they were designated Special Concern by COSEWIC in 2012; they were listed on the SARA Registry as Special Concern at the very time that the decision to end the licensed hunt was announced, in 2017.
- 2) Before closing the hunt, the government knew that the Auditor General's report on grizzly management would soon be released, and that it had found serious flaws in data supporting the hunt. It said the government did not have the scientific data to ensure that the hunt was sufficiently regulated to protect grizzly bears; nor did it have sufficient staff to reduce poaching.

¹ McCrory, W.M., Expert environmental review shows Zincton's resort proposal will cause major and serious population declines of the Selkirk Grizzly Bear", June 7, 2020.

Hunting organizations have ever since claimed that the system for regulating the number of hunting tags was SCIENCE, as opposed to emotions of those who supported closing it. But the AG's 2017 report portrayed the "science" behind the grizzly bear hunt as flawed and inadequate, its conclusions uncertain. It said the government's calculations had no reliable basis because it hadn't been able to accurately inventory grizzly bear numbers, and thus didn't know with any certainty how many there were in BC.

After the hunt was closed, the BC Wildlife Federation and the Guide-Outfitters Association misleadingly claimed that the AG's report supported the grizzly bear hunt — omitting the substantial criticisms in the report. For instance, the Auditor General's report considered cumulative mortalities, reporting that there was "uncertainty" in "estimated population sizes, unreported mortalities and the sex and age of those grizzly bears killed that are unreported."

The AG's report drew its conclusions from substantial professional input. The Ministry of Forests, Lands, Natural Resource Operations and Rural Development's (MFLNRORD) biologists' reports were consistent with her findings:

"Grizzly Bear hunting is in high demand in the southeast corner of BC ... Past data have generated imprecise population estimates and there is on-going debate over population size and sustainable kill levels. The known Grizzly Bear mortality rate in the BC South Rockies has exceeded 5% of the estimated population in most years over the last two decades ... The South Rockies is one of 3 areas in BC with consistently high levels of human-caused grizzly mortality. Hunting has been reduced or closed several times in the South Rockies and the neighbouring Flathead unit, because female kill, or total kill, has exceeded maximum allowable mortality levels, while local residents argue that bear numbers remain high or are increasing. The demand for hunting, plus the ongoing uncertainty regarding population size, trend and sustainable kill levels has made managing Grizzly Bear harvest in this portion of BC very complex." — Garth Mowat, Bruce McLellan et al, FLNRORD, 2013.

The 2017 AG's report identified key threats and a government failure to manage for conservation. It explained that in 2011 the management authority over wildlife was taken away from the Ministry of Environment and given to the Forests Ministry. The Environment Ministry has a conservation mandate, the Forests Ministry doesn't. The auditor went on to cite numerous ways in which the Forests Ministry was failing to adequately manage Grizzly Bears:

- "There are 600,000 km of resource roads with on the order of 10,000 km more added each year There is no overall plan [to reduce or decommission] resource roads."
- "There has been little effort to address the issue of connectivity for Grizzly Bears or to provide wildlife corridors and safe transition areas for those populations in the south that may have limited migration and may experience genetic inbreeding...."
- The Ministry lacked a Grizzly Bear management plan and was not monitoring and evaluating the effectiveness of activities undertaken to mitigate impacts on habitat or conserve habitat.
- Inadequate direction and oversight has been provided by the Forests Ministry to ensure that habitat for Grizzly Bears is protected — both now and in the future.

In 2020 a different Auditor General released a report on "Management of Conservation Lands" by the Forests Ministry. The AG report stated:

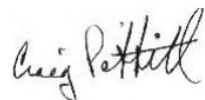
"We concluded that the ministry had not effectively managed the Conservation Lands Program to conserve important habitat." Some of the reasons cited: a "No provincial strategic plan ... plans for Wildlife Management Areas (WMAs) not renewed for almost 19 years, 70% of them never approved, 3 WMAs don't have plans."

The flaws in the management of grizzly bear hunting back then remain today.

The Stewardship report goes on at length about the First Nations' right to unlicensed hunting of grizzly bears for traditional purposes, but that right was recognized when the licensed hunt was closed, and to our knowledge no one has ever objected to it and it is not in any jeopardy.

In 2017 a large swathe of British Columbians told the government that killing grizzly bears for trophies is disgusting and morally indefensible. It still is, no matter who is paid \$20,000 to guide a hunter to the kill. The quest for science must mean real science and ethical science. Prominent wildlife biologists have repudiated the idea that all that matters in the treatment of wildlife is populations. They hold that the human moral nature has responsibilities to individual animals, to prevent suffering, and respect their intrinsic value and family lives.

Sincerely,



Craig Pettitt
Director



Amber Peters
Staff Biologist