CANADIAN PARKS AND WILDERNESS SOCIETY
SOUTHERN ALBERTA CHAPTER

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Hon. Shannon Phillips
Minister Environment and Parks
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Dear Minister Phillips,

The Canadian Parks and Wilderness Society – Southern Alberta chapter (CPAWS SAB) appreciates the opportunity to provide feedback on the draft Grizzly Bear Recovery Plan (2016-2021).

The Canadian Parks and Wilderness Society (CPAWS) envisages a healthy ecosphere where people experience and respect natural ecosystems. CPAWS is the only national conservation organization dedicated to the protection and sustainability of public lands across the country. CPAWS Southern Alberta Chapter promotes awareness and understanding of ecological principles and the inherent values of wilderness amongst resident Albertans and visitors.

CPAWS has been working on conservation in Alberta since 1967. Our particular role as an environmental organization in Alberta is to provide landscape scale, science-based support and advice for the conservation and protection of Alberta's protected areas and wild lands. We have a positive public profile and pride ourselves on working cooperatively with government, First Nations, businesses, non-government organizations and individuals to achieve practical conservation solutions on the landscape.

Overall CPAWS supports the goal and objectives of the recovery plan with a number of serious concern and recommendations. The draft Grizzly Bear Recovery Plan (GBRP) makes some progress to outline a provincial strategy of actions to address threats to the overall species population but fails to adequately address a number of key issues.

Strengths

Connectivity

Major highways in Alberta are fragmenting grizzly bear habitat and causing populations to become isolated. One of the strengths of the new plan is the recognition of the need to connect our grizzly bear populations across these major highways and ensure bears can move safely throughout the Rockies and foothills. CPAWS supports the focus on connecting subpopulations across fracture zones including a 5 km buffer along major highway corridors (Habitat Linkage Zone). However it is unclear how the zone will be defined to be more specific than the 5 km used to "communicate the management intent to stakeholder" and what specific management actions will be implemented in the Habitat Linkage Zones to encourage connectivity. The Habitat Linkage Zones should also be extended to include the Support Zones.

For example the Rock Creek Corridor is located just east of the area mapped as a Habitat Linkage Zone on Highway 3 and the 5km buffer zone cuts off some of the key ridges that make up the movement corridor in the pinch point just north of the highway. These areas should be included in the Linkage Zone and similar analyses made for each highway and zone across the province.

The plan also states that "overpass and underpass development can be very effective for ensuring connectivity across high traffic transportation corridors." Along Highway 3, a lot of work has been done to identify specific areas for crossing structures to facilitate movement across the highway. These areas should be identified in the GBRP, included in the Habitat Linkage Zones and actions specified to build crossing structures at these location.

Community Support

CPAWS Southern Alberta supports the addition of the Support Zone to acknowledge grizzly bear use of habitats outside of public lands and to recognize the need for extra support to communities within this zone to decrease conflicts and support co-habitation with bears.

CPAWS Southern Alberta also strongly supports the renewed focus in the Recovery Plan to support communities and landowners in bear country through education and conflict-mitigation strategies. To ensure this part of the recovery plan is successful, community programs will need dedicated funding to help people co-exist with grizzly bears as the species recovers.

We are encouraged to see the recommendation of a full-time provincial coordinator for the Alberta BearSmart program as well as a human-wildlife conflict specialist in all regions with high levels of grizzly bear conflict.

Concerns

Road Densities

Much of the grizzly bear habitat on Alberta's public land is highly fragmented with roads and motorized trails. These trails allow people to access core habitat areas, increasing the risk of conflict and of bear deaths. The document identifies public motorized access associated with increasing road density as a major contributor to human-bear conflicts that result in grizzly bear deaths. Human-caused bear deaths, including poaching, vehicle and train collisions, self-defense kills and hunters mistaking a grizzly for a black bear, are often facilitated by motorized access into bear habitat which puts bear populations at risk.

Limiting disturbances and providing safe habitat is critical to recovering grizzly bears. The GBRP bases the change in linear density from open route to open road on recent research showing grizzly bear deaths in proximity to roads. It is important to use strong science in making land-use decisions. The plan states that research on the effect of motorized recreation has not been done in Alberta. In the absence of this research, caution is absolutely necessary when applying thresholds.

Other research in North America demonstrates that human access into grizzly bear habitat via both roads and trails, particularly motorized access, is the highest risk to bears (McLellan et al. 1996; Benn and Herrero 2000; Northrup et al. 2012, Apps et al. 2016). Even within the National Parks, Benn and Herrero (2000) found that all human-caused mortalities within the study area fell within 500m of roads and 200m of trails. In the absence of specific studies on motorized trails in Alberta, based on other research it should be assumed that recreational trails into grizzly bear habitat increase mortality risk.

Rather than focus solely on public roads there should be a focus on access into grizzly bear habitat and decommissioning motorized trails which allow heavier use into grizzly habitat.

The GBRP states that "there is no systematic process to assess whether a road has been effectively closed and the precautionary approach is to assume it is open. Managing motorized access on public lands remains an important grizzly bear recovery implementation challenge." However, in 2010, Global Forest Watch conducted a linear disturbance density assessment for the Castle FLUZ, using satellite data verified by Google Earth images and subsequent ground-truthing, suggesting that this process is possible. Priority should be placed on this assessment. CPAWS Southern Alberta asserts that, using the precautionary principle purported in the document, until this process has been undertaken, the GBRP should assume that linear features other than public roads are open to motorized recreational use and calculate density thresholds accordingly. Lack of information is not an acceptable rational for excluding trails that likely influence grizzly bear mortality.

Precedent from other jurisdictions supports the inclusion of motorized recreation trails in calculation of linear densities. The US Forest Service defines "open motorized access" as anything with motorized vehicle access, including OHVs, and land managers are legally required to maintain densities of open motorized access below 0.6km/km^2 in core areas of National Forest lands.

The linear planning process under the Land Use Framework in the Porcupine Hills and Livingstone indicates that linear densities are magnitudes above thresholds when OHV trails are included. CPAWS supports a recommendation that a policy Directive or similar tool be implemented that would require that grizzly *open route* (not just open road) density limits be considered in the planning and permitting of new roads in the Core and Secondary Zones until the LUF planning is done.

Research has also shown grizzly bears avoid buffers surrounding roads with heavy vehicle use and can be displaced into other areas (Mace et al. 1996; Northrup et al. 2012). Thus research on noise disturbance and avoidance of areas with high recreational use as well as potential displacement onto private lands should also be included in the GBRP.

CPAWS supports the action to "Develop and refine methodologies to determine and monitor open route density. Quantify the effect of off-road OHV use on grizzly bear mortality and whether there are contextual nuances in geography or human behavior in specific BMAs that are particularly important and need to be managed." However until this research has been done the precautionary principle must be used and all open routes included in linear density calculations.

Secure Habitat

The GBRP includes objectives for maintaining secure habitat but no specific targets for secure habitat in the Recovery or Support Zones. For example the US Forest Service is legally mandated to ensure that 60 percent of forest service lands in each Bear Management Unit in the Flathead National Forest over a five year period and 68 percent of lands over a 10 year period are secure habitat, defined as 0.3 miles (~.48 km) from open roads (including OHV trails) and high-intensity, non-motorized trails. CPAWS Southern Alberta recommends that targets be used for secure habitat in Alberta in order to monitor and maintain secure habitat.

Other land-uses must also be considered in grizzly bear recovery. For example Apps et al. (2016) found that although forest cutblocks can be productive for grizzly bears, bears were negatively associated with cutblocks in southern B.C. and Alberta. Forest management should be more effectively incorporated into

land use planning (e.g. avoiding cutblocks in high grizzly bear habitat areas) to meet grizzly bear recovery objectives and actions.

Porcupine Hills

Another key area of concern is the removal of the Porcupine Hills from designated Recovery (Core and Secondary) Habitat to merely Support Habitat. The Porcupine Hills contains high value grizzly bear habitat and is important for facilitating movement of bears. Downgrading this area would remove the limitations on road and trail densities in the Porcupine Hills, potentially pushing bears onto private lands and could allow for higher tolerance for deaths and relocations. As one of the last vestiges of grassland grizzly habitat on public land it is important to retain this area as core habitat in the plan.

Nielsen et al (2006) recommends a goal of no net loss of secondary and especially primary habitats. Removal of the Porcupine Hills could facilitate higher linear features and habitat loss and effectively removes 184 km^2 of Core and 209 km^2 of Secondary habitat.

No rational is given for the removal of this habitat from Recovery Zone. Current levels of linear disturbance in the Porcupine Hills are completely unreasonable (see Figure 1) and may be contributing to lower habitat value under current conditions. However a number of habitat models have shown high value habitat in the Porcupine Hills (see Figures 2 and 3) and grizzly bears are known to use this areas. Current disturbance and mismanagement of this area should not be used to justify removal of the Porcupine Hills from the Recovery Zone.

Mortality Thresholds

CPAWS Southern Alberta is concerned that the draft GBRP increases mortality limits in BMA's 5 and 6 to "less than 6.0% of the population, of which the female mortality rate does not exceed 1.8 %". These changes could accommodate higher human-caused deaths in the Castle and Livingstone grizzly populations than is currently happening.

Morehouse and Boyce (2016) state that the most recent population estimate for BMA 6 is 67 resident bears (as part of a larger transboundary population, including 172 bears using the area). However this suggests that new mortality calculations will not only be based on a larger population but a higher mortality limit and could result in accommodation of even more deaths than in the past. While it is important to understand the context of the Alberta portion of this population within a larger transboundary population, it is also irresponsible to allow Alberta to be a sink for resident and transitory bears.

As these populations appear to be increasing, it is more important than ever to reduce conflicts in these areas for the safety of bears and people. Having higher tolerance for grizzly deaths in this region could prevent action on addressing critical issues like intense OHV use and logging in grizzly bear habitat which may cause grizzlies to be displaced onto private land where the habitat is more secure. The GBRP cites the success of the Blackfoot Challenge in reducing conflicts on private lands and similar initiatives in Alberta. There should be a large focus on supporting communities and ranchers with attractant management in the Castle and Livingstone population areas to reduce conflicts with bears rather than increasing the accepted mortality limits.

Population

CPAWS Southern Alberta is concerned about the suggestion that the status of grizzly bears in Alberta could be down-listed from Threatened with fewer than 1000 mature individuals being estimated in the province. While we support that idea that issues associated with human-caused mortality and the supply of high quality secure habitat, as well as connectivity between subpopulations, must also be considered in any decision to downgrade listing it is also important to consider total population size.

Having secure habitat and effective mortality management will not protect against the "random events causing population reductions" to which small populations (of any species) are intrinsically vulnerable. That criterion, which was partially used to qualify the Alberta population of the grizzly bear for Threatened status, was based on solid science. The standard of 1,000 breeding adults is an international standard for a healthy population of large mammals. We know of no science that suggests otherwise or that would suggest abandoning that goal.

Conclusion

Albertans are proud of our world-class wildlife. In particular, grizzly bears symbolize the wild and free spaces that Albertans value. There is room in Alberta for recreation, ranching, and resource development, but we also need to conserve and connect our best wildlife habitat. Managing the landscape for grizzly bears also provides habitat for many other species, helps maintain fish and healthy aquatic ecosystems, and protects clean and abundant supplies of water for downstream users.

We appreciate the opportunity to provide feedback towards strengthening the Grizzly Bear Recovery Plan (2016-2021) and look forward to seeing our recommendations incorporated into the final document.

Please feel free to contact me if you have any questions.

Sincerely,

Katie Morrison
Conservation Director
CPAWS Southern Alberta Chapter

Cc:

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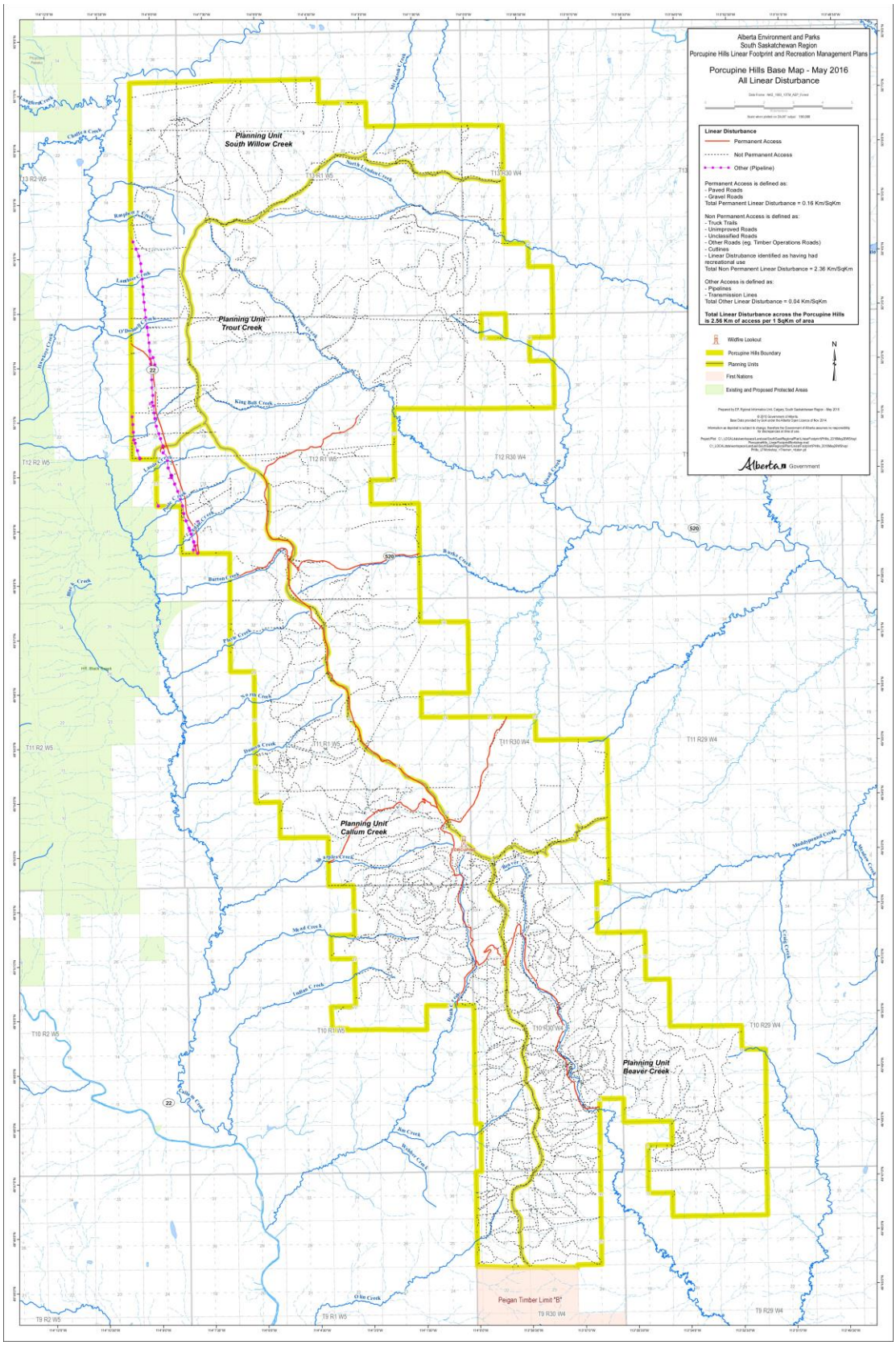

Figure 1: Porcupine Hills All Linear Disturbances (Source: Government of Alberta)

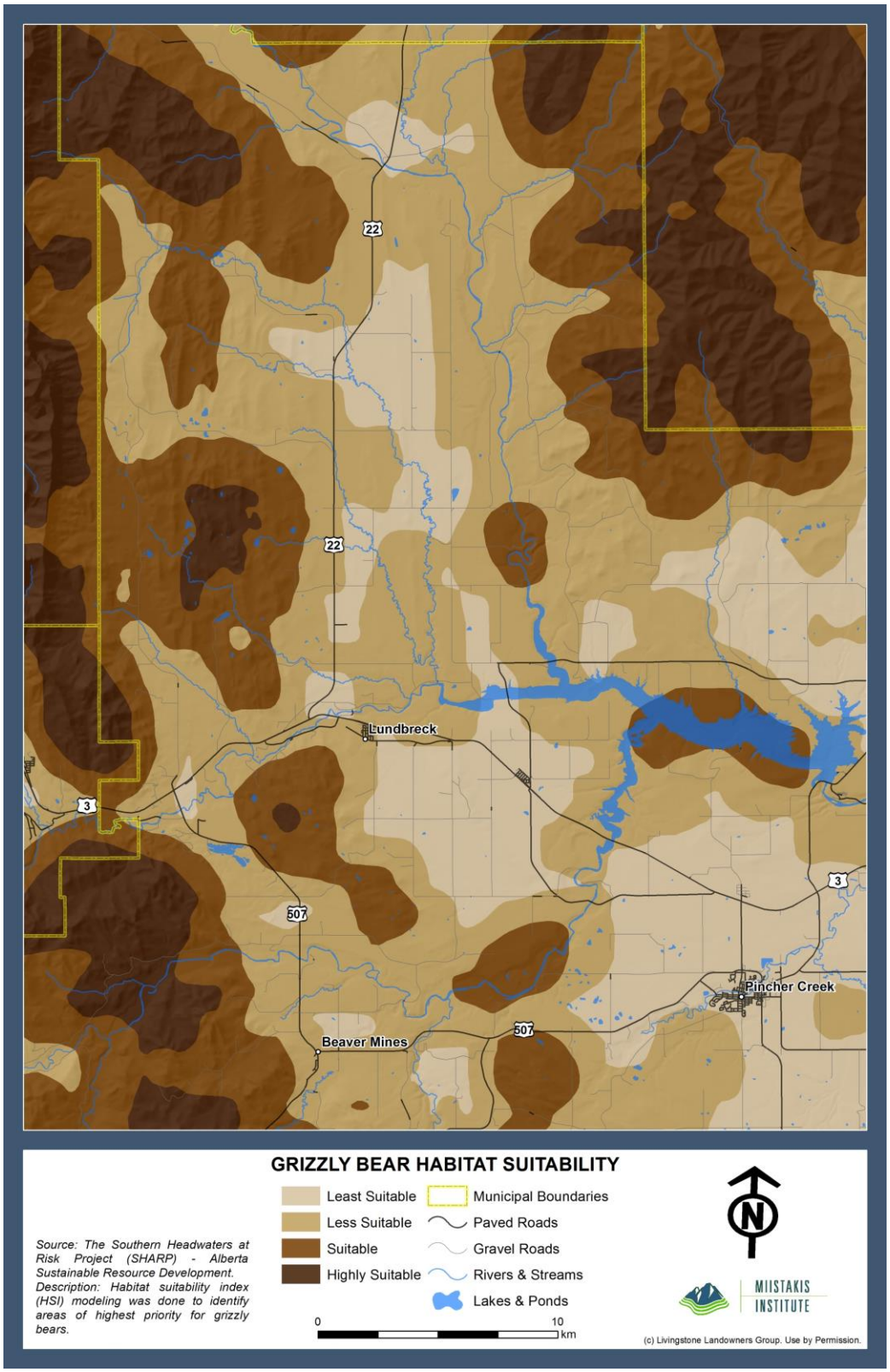

Figure 2: Grizzly Bear Habitat Suitability South Porcupine Hills (Source: Livingstone Landowners Group)

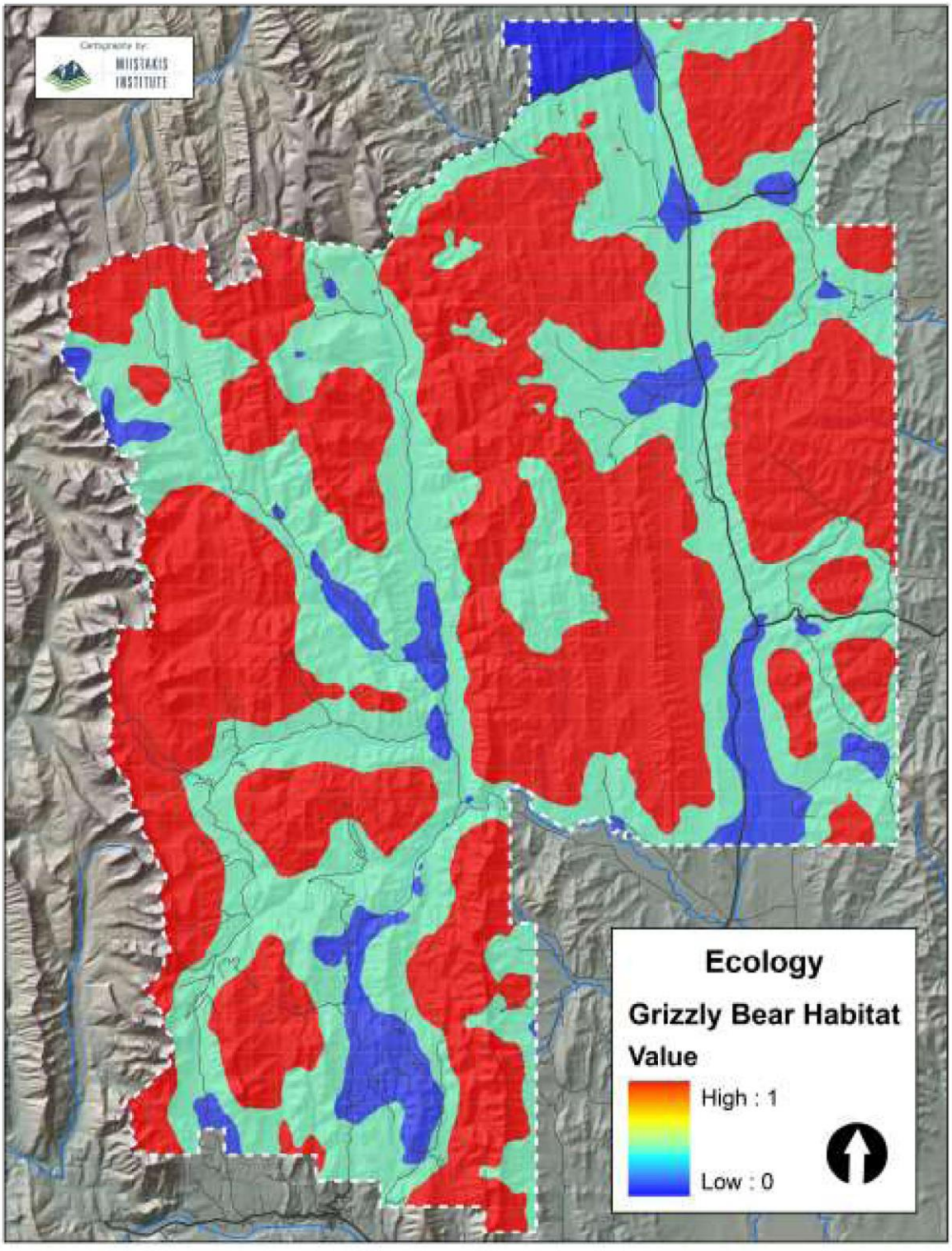

Illustration 5: SHARP Grizzly Bear Habitat Value Layer

Figure 3: Porcupine Hills Grizzly Bear Habitat (Source: MD Ranchlands)