



# South Chilcotin Mountains Park and Big Creek Parks Management Plan comments

#### Context of our comments:

Our comments on the draft park Management Plan reflect the explicit focus of the Coast to Cascades Grizzly Bear Initiative: to ensure the recovery of grizzly bears in southwest British Columbia's five threatened grizzly bear population units (GBPUs). Some Coast to Cascades Grizzly Bear Initiative (C2CGBI) partner organizations may wish to comment independently and on a wider range of issues.

Southwest BC's five threatened GBPUs include Garibaldi-Pitt (3 bears), North-Cascades (6 bears), Stein-Nahatlatch (24 bears), Squamish-Lillooet (59 bears), and South Chilcotin Ranges (203 bears) (BC Government, 2012). (www.coasttocascades.org)

Although its population is still depressed, the South Chilcotin Ranges GBPU has the largest population of southwest BC's five threatened GBPUs. However with 13 animals per 1000 square km (BC Government, 2012), grizzly bear densities in the GBPU are considered low (Nielson, 2011).

Nonetheless recovery of the other four threatened GBPUs to the south depends in large part on the South Chilcotin Ranges GBPU as a source population and a pivotal link in a regional grizzly bear meta-population insofar as it is located between the "threatened" units and nearest two "viable" grizzly bear population units. Grizzly bears expanding south from the South Chilcotin Ranges GBPU will be an important contribution to repopulating adjacent, more depressed populations.

#### The Parks' Importance to Grizzly Bears:

C2CGBI supports and agrees with the emphasis put on the importance of grizzly bears and the regional significance of these parks in grizzly bear conservation and recovery as, for example, reflected in:

- 2.1 Significance "The area is also core to maintaining Grizzly Bear populations in southern British Columbia, linking populations to the north and south."
- 3.1 Vision "Healthy wildlife populations continue to roam the wilderness. Grizzly Bear and Moose have recovered to levels where they now contribute to surrounding populations."

# Wildlife 3.2.2:

C2CGBI is encouraged by the Objectives and Management Strategies in this part of the draft plan.

The Objective on page 24 currently states: "Ensure a healthy Grizzly Bear population that contributes to provincial population recovery." We suggest that this would be better stated as "Ensure a healthy Grizzly Bear population that contributes to regional and provincial population recovery" as it better reflected by the first Management Strategy under that Objective.





















We support the intent of the creation of core areas and ensuring connectivity in the second Strategy on page 24. If the core areas referred to here are the same core areas that are captured in 3.3.1 Wilderness Recreation #1 Zone and on the map in Figure 7, then that connection should be made or, if not, it should be differentiated.

Number 6 on page 45 and number 3 on page 51 should be expanded beyond just "bear aware" to "bear smart biking, hiking, camping, etc practices" and incorporated as a Management Strategy. We recommend the creation of a "Bear Smart Code of Conduct" for these parks that includes specific practices to a variety of user groups and how they actually travel through and use the parks.

We support innovative solutions to avoid surprise bear encounters like trail rerouting as mentioned on page 25.

While we compliment BC Parks on the strong focus on wildlife and in particular grizzly bear conservation, C2CGBI wants all park users, to the extent possible, to be supporters of grizzly bear conservation and recovery both inside and outside these parks. We are concerned that, if not managed well and openly through additional dialogue and planning, unnecessary tension between the goals of grizzly bear conservation/recovery and those of other parks users may occur.

For example, we are aware of a high level of concern in the mountain biking community around possible restrictions on access listed in the management strategies (e.g. on pages 24-26) and how those possible measures will affect mountain biking. Similar to our initial conversations with WORCA, (Whistler Off Road Cycling Association), C2CGBI encourages further multistakeholder dialogue to clarify and fine-tune the Park Management Plan before sign-off and to focus on a "sub-plan" to deal with many of the possible access management measures alluded to on pages 24 to 26. Our comments regarding implementation and adaptive management reflect this as well.

# 3.3 Zoning Plan:

We support the zoning of the park with the intent, in Wilderness Recreation #1 Zone, to have a strong focus on important core wildlife habitats including those for grizzly bear. However the draft zonation map in Figure 7 show that some very well-used trails which are often part of a single day's trip, lie partly inside and partly outside #1 Zone areas. Given that most human-grizzly bear interaction occurs on the trails network it would appear that there may be merit in possibly reconsidering the boundaries to reflect both wildlife values and human use patterns to make things clearer on the ground for park users.

Similarly, in conjunction with zonation, if the plan were to develop "trail by trail" management prescriptions, these should recognize the fact that they are crossing #1 Zone and #2 Zone boundaries one or more times.

#### Adjacent Land Use:

The importance of managing adjacent lands to maintain park values is well-stated a number of times in various places in the document. As noted, this is important for conservation of grizzly bears in the parks and in the region. C2CGBI agrees with such an approach so that as stated in the Vision, "Compatible management of lands adjacent to the parks ensures that the parks have not become an "island of protection." Consideration might be given to actually capture more of



















that general concept in section 1.4. Our support includes the Management Strategies on page 20 regarding key future park additions and boundary amendments (although we suggest that boundary amendments that better capture ecological needs could also be appropriate).

# Ranching & Grazing:

The submission you have received from Jacquie Rasmussen largely summarizes our comments on these issues including the final management strategy on page 25 regarding predator controls. It is important that Range Plans are adequately focused not just on habitat impacts but also the importance of lowering mortality risk to grizzly bears.

## Hunters:

It is important that non-guided and guided hunters in these parks are:

- educated/reminded of the importance of not shooting a grizzly bear when black bear hunting and can distinguish between the two species;
- are instructed in proper meat handling/hanging practices (to be developed) to reduce risk of the meat becoming a bear attractant and increasing risk of grizzly bear mortality
- encouraged to carry pepper spray so firearms are not the fall back defense against close grizzly bear encounters

#### Summer fixed wing (floatplane) air access:

Floatplane access to Warner and Lorna should be determined through subsequent multistakeholder access planning discussions regarding grizzly bears and core habitat management specifically related to trails in the Warner and Gun Creek watersheds, and trails to and from Lorna Lake and upper Big Creek.

# Trails, Routes, and Camping:

There are more heavily used areas of these parks where it would be best to limit use to specific trails, routes and camping sites or camping zones for grizzly bear management and security. At least in the short term, some remote/harder-to-access (western?) areas of the parks may not require this. Consultation with users will be important.

# Implementation:

We agree with the statement in the first paragraph of section 4.1 that wildlife habitat analysis will require more detailed planning. As noted below, we also support the need for ongoing monitoring of grizzly bear use (e.g. through collaring, DNA analysis, a formalized system of public recording of grizzly bear sightings [citizen science] etc).

Additionally, it is very important to develop "sub-plans" (e.g. trail use plans, hiker/biker grizzly bear best management practices, trail location changes, etc.) to best achieve the Objective and Management Strategies on pages 24 to 26. Such multi-stakeholder developed plans would finetune the Management Strategies and help achieve maximum possible stakeholder buy-in. They should be flexible as experience and new information/science dictates. These plans should be iterative and changeable within a shorter timeline than 5 year plus Park Management Plan revision timelines.

C2CGBI also recommends the creation of an ad hoc group to work with and advise BC Parks on a variety of issues broadly including implementation, adaptive management, and research. First Nations would have to decide if such a committee would be an appropriate place for their participation as would local governments, but minimally such a group could include commercial





















users, non-commercial users (e.g. hikers, bikers, horse riders, hunters) and ENGOs. It might be a useful forum to learn about the range of user values, exchange ideas, and optimize support for many aspects of plan implementation.

# Adaptive Management:

As mentioned in our comments with regard to implementation, we are not confident that resources will permit the Park Management Plan to be revised every 5 years for less. Our comments regarding implementation are intended to deal with having "sub-plans" that can be more responsive to grizzly bear management needs than what would be purely embedded in the next final Park Management Plan. To best reflect this, Section 4.3 could have that intent added for clarification.

Relatedly, the sixth strategy on page 25 mentions adaptive management in the context of grizzly bears. However, it is important that flexibility extend to more than, for example, a temporary campsite closure, and deal with broader and ongoing issues (e.g. carrying capacity) and grizzly bear-related "sub-plans".

# Scientific Research including Habitat Mapping:

From both the standpoint of implementation and adaptive management, it is important that research continues so that the Management Plan is as grounded in science as is reasonably possible. Good science, well-communicated is also fundamental in getting buy-in from park users for any required changes to park use patterns or practices. Sufficient scientific research will require the support of, and efforts by not only BC Parks but also other BC Government staff in the Ministry of Environment and the Ministry of Forests, Lands and Natural Resource Operations.

It would seem that some of the important work that needs to occur in the short-term includes:

- grizzly bear collaring (and DNA?) work to have a better understanding of grizzly bear use in key park habitats
- a formalized system of public reporting and tracking of grizzly bear sightings and reactions by all park users (citizen science)
- better overall park use numbers and breakdowns by user type (If we are correct in assuming that good reporting does exist for commercial users, a focus on noncommercial use would be the priority. Measures could include better trailhead selfreporting and, on specific trails, counters (cables or other automatic devices) might be used for more accurate user days and patterns over the season.)
- better habitat mapping (and its use by grizzly bears) is required (This is important as habitat mapping is likely to influence park use patterns (spatially and temporally) and, particularly if the information dictates certain restrictions, it should ultimately be based on the strongest level of science that is practicable to achieve and that will result in a higher level of park user buy-in. In the interim, decisions can be based on the best knowledge available. But it would be useful for the Plan to explain how the habitat map in Figure 4 on page 12 was derived and how the product mentioned in the third Management Strategy on page 24 would evolve in relation to the current Figure 4.)

#### Carrying capacity:





















It is widely recognized that these two parks have very high recreation values for a hikers, bikers, horseback riding etc. And it is likely that recreation pressure will increase, particularly in South Chilcotin Mountains Park given its better road access.

As mentioned on page 48 regarding the Lillooet LRMP, the Management Plan should include the ability to incorporate limits on carrying capacity in certain areas of the parks (along specific trails at specific times of the year for example) for non-commercial users and commercial users. This would not only protect the park visitor experience and trails, but would also help minimize the impact on wildlife and other park values/resources.

Clearly embedding carrying capacity management as a potential tool in this iteration of the Management Plan is more prudent than relying on a future iteration. Despite the fact that BC Parks may currently have staffing and budget challenges, it makes sense for the Management Plan to include this provision at the outset.

Sensible but conservative limits on commercial users should be set now. Experience in other parks has shown the difficulty of reducing commercial operations once such levels are entrenched should they be deemed unsustainable or counterproductive.

The Management Plan should include a trigger for limits on non-commercial users and commercial users. The Plan should clearly communicate the rationale behind the trigger - that it is a precautionary number that doesn't grandfather a level of use if that level proves unsustainable and needs to be scaled back in the interests of quality recreation and human and grizzly bear security.

## Climate Change:

Climate change is mentioned on pages 18 & 19 but, if above-treeline habitats are important to grizzly bears, the plan should acknowledge that treeline will likely rise and the amount of productive alpine habitat will decrease. A strategy to appropriately manage shrinking alpine from a wildlife perspective should be incorporated (e.g. consideration of burning some treeline habitats, modified access management measures).

Similarly, depending on how changes in future precipitation are manifested (drier or wetter? more snow or less snow?) vegetation in other important habitats (e.g. possibly the more open grassy areas and open aspen forests below Spruce Lake) may change as well dictating changes in use by wildlife. The Management Plan should retain the flexibility to adapt around the long-term changing needs of wildlife including grizzly bears.

Sincerely, Johnny Mikes, Field Director Coast to Cascades Grizzly Bear Initiative



















