



Reference: 235008

January 31, 2018

Dave Clarke, Executive Director  
Forest Practices Board  
PO Box 9905 Stn Prov Govt  
Victoria, British Columbia  
V8W 9R1

Dear Dave Clarke:

**RE: Government response to Complaint Investigation #15048**

On behalf of the Ministry of Forests, Lands, Natural Resource Operations and Rural Development, please accept this letter as government's response to the Forest Practices Board's (the Board) four recommendations outlined in Complaint Investigation #15048: Forest Roads and Grizzly Bear Management in the Kettle-Granby Area (August 2017). The ministry appreciates the review and clear recommendations.

Reducing road density and use are important components for the recovery of the Kettle Granby grizzly population; however, the prohibitive cost of road rehabilitation actions required to meet current non-legal road density targets can prevent the establishment of legal targets under Section 2(c) of the Government Action Regulation (GAR). Given that multiple factors influence grizzly bear populations, both habitat and population actions will be required to conserve Kettle-Granby grizzly bears and the ministry is investigating a number of tools including access control measures.

The following content reflects the ministry's response to the Board's four recommendations:

***Recommendation to Government***

1. Government should confirm its population recovery objective and develop a strategy that includes a population target for the Kettle-Granby grizzly bear population unit that can be used to guide habitat management and industrial planning decisions.

***Government response:***

Government recognizes the importance of provincial and regional plans for wildlife. In response to the 2017 Auditor General's report into the provincial management of grizzly bears, government has committed to:

- development of a provincial grizzly bear management plan, which will help inform the development of area-specific objectives for populations. The population inventory completed for the Kettle Granby grizzly bear population unit (GBPU) will be used to inform its priority for management planning relative to other provincial populations.
- Reassessment of the carrying capacity of the Kettle Granby GBPU to put the current population estimate into context and help inform future recovery and management actions required to achieve population objectives.

***Recommendation to Government***

2. Government should consider revising GAR Order 8-373, in light of the recent grizzly bear research in the Kettle-Granby area and the failure to meet the road density targets through voluntary guidance. This reconsideration should weigh the benefits of road density and secure core area measures to government's recovery objectives for the Kettle-Granby grizzly bear population unit against an informed assessment of any material adverse effects on delivered wood costs.

***Government response:***

The government accepts that recommended road densities and secure core area targets within GAR Order 3-873 have not been met by forest licensees and ministry staff. However, placing legal requirements on licensees to achieve these road density targets requires solutions to reduce economic risks, such as delivered wood costs. To address the potential economic impact, the provincial government supports a review of long-term funding alternatives for industry-led road deactivation and rehabilitation activities within the Kettle-Granby GBPU. This could include options such as committed funding or other cost-recovery mechanisms for licensees. In the interim, managing road densities within the GBPU will rely on a ministry led partnership with industry to proactively identify opportunities for road deactivation and rehabilitation.

Nonetheless, the ministry will complete a full review of GAR Order 3-873 and alternative tools to achieve objectives. The review will recommend necessary revisions to the order including consideration of a:

- Review of important grizzly bear feeding habitats (defined as Schedule B areas) to ensure consistency with current research and target these areas for seasonal road closures for enhanced habitat management.
- Requirement for licensees to report road densities and secure core area (SCA) within their operating areas. This information will be used to inform management decisions on road deactivation/rehabilitation in combination with scientific research and to allow for government oversight of licensee operations.

***Recommendation to Government***

3. Government should provide leadership to reduce the current risks to bears in the Kettle-Granby area. Government should lead local licensees and BCTS in an operational planning process for roads and timber harvesting in the Kettle-Granby specified area that protects high value bear habitat and addresses access management, such as road deactivation and regulatory road closures, while integrating with timber objectives. The Board's previous reports on access management may be helpful to this exercise.

***Government response:***

The government will provide leadership by co-ordinating road deactivation and rehabilitation activities with licensees across the Kettle Granby GBPU. This work has already been initiated by BCTS, including planning for deactivation in high priority habitat areas. These partnerships will pursue multi-year funding from applicable provincial internal and external funders for planning and implementation works as early as the spring of 2018. The government supports:

- Appointing a regional lead to work directly with industry operating within the Kettle Granby GBPU in order to identify opportunities for road deactivation and rehabilitation and discuss proposed cutting permits and existing road networks.
- Reducing the impacts of road density and use will require a combination of operational and legislative tools. Current scientific research, including ongoing assessment of non-hunting grizzly bear mortality risk, will direct road rehabilitation priorities using secured funding, while legal road closures (under the *Wildlife Act*) will be proposed for roads considered essential for natural resource operations or to facilitate recreational activities.

***Recommendation to Government***

4. Government should monitor the amount of open road density, secure core area, and grizzly population size and distribution over time and make further adjustments to management and legal requirements if and as needed.

***Government response:***

The government acknowledges that monitoring of grizzly bear populations and recovery actions is required to ensure that appropriate management actions are taken and remain effective over time. The government commits to:

- Developing a monitoring program to inform adaptive management actions required to meet grizzly bear population objectives of the Kettle-Granby. The scope of the monitoring program will be outlined in the provincial Grizzly Bear Management Plan (noted above in response to Recommendation #1) and adapted for the Kettle-Granby GBPU.
- Monitoring road densities within the GBPU.

## Forest Practices Board

Successful management and recovery of grizzly bears in the province will require practical measures to be taken across the landscape to address the underlying pressures on populations, habitats and their resilience. The ministry and the Board appear to align on the importance of managing forest roads in that context. Efforts directed at addressing the impacts of roads and their use will require more than GAR amendments and will need effective collaboration between government, industry, First Nations, stakeholders and the public. This is a challenge we are committed to working on.

I would like to thank the Forest Practices Board for its report and recommendations to the ministry. If the board has any questions regarding the ministry's response please contact Garth Wiggill, Regional Executive Director, Kootenay Boundary Natural Resource Region by phone at 250 825-1109.

Yours truly,



T. R. (Tim) Sheldan  
Deputy Minister

pc: Gerry MacDougall, Acting Assistant Deputy Minister, South Area  
Tom Ethier, Assistant Deputy Minister, Resource Stewardship Division  
Garth Wiggill, Regional Executive Director, Kootenay Boundary Natural  
Resource Region  
Jennifer Davis, Executive Director, Resource Practices Branch  
Allan Lidstone, Director, Resource Management Objectives Branch  
Jennifer Psyllakis, Director, Fish and Wildlife Branch  
John Krebs, Director Resource Management, Kootenay Boundary Natural  
Resource Region



File: 97250-20/15048

February 15, 2018

T.R. (Tim) Sheldon  
Deputy Minister  
Ministry of Forests, Lands,  
Natural Resource Operations and Rural Development  
P.O. Box 9532 Stn Prov Gov't  
Victoria, BC V8W 9M1

Dear Tim Sheldon:

**Re: Response to the recommendations in Complaint Investigation 15048**  
*Forest Roads and Grizzly Bear Management in the Kettle-Granby Area*

Thank you for your letter of January 31, 2018, in response to the Board's recommendations to develop a strategy to guide habitat management and industrial decision making, to revise GAR Order 8-373, to reduce current risks to grizzly bears in the Kettle-Granby area, and that government monitor the area over time.

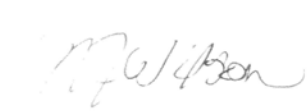
The Board is pleased to acknowledge government's commitment to:

- 1) develop a strategy that will be used to guide grizzly bear habitat management and industrial planning decisions;
- 2) review GAR Order 3-873 including consideration of current research in important grizzly bear feeding habitats to target areas for seasonal closure and to have licensees report road densities within their operating areas;
- 3) co-ordinate road deactivation and rehabilitation activities with licensees across the Kettle-Granby grizzly bear population unit; and
- 4) develop a monitoring program to inform adaptive management actions and to also monitor road densities in the grizzly bear population unit.

Tim Sheldon  
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Please send us a copy of the grizzly bear management strategy when it is finalized. We would also be interested to see the GAR Order after it has been revised. We now consider this file closed.

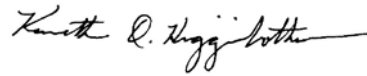
Yours sincerely,



Norma Wilson  
Chair



Marlene Machmer



Ken Higginbotham

cc: Russ Laroche, British Columbia Timber Sales  
John Krebs, Ministry of Forests, Lands, Natural Resource Operations, and Rural  
Development  
Randy Waterous, Interfor  
Margaret Steele, Friends and Residents of the North Fork