



**ALBERTA WILDERNESS ASSOCIATION**

*"Defending Wild Alberta through Awareness and Action"*

October 26, 2009

Dear Minister Morton

**Re: Grizzly Response Guide**

Thank you for the opportunity to respond to the first draft of the Grizzly Bear Response Guide. Alberta Wilderness Association (AWA) welcomes SRD's attempt to standardize its response to grizzly bear encounters. We do have a number of comments and suggestions that will, if implemented, help to make the document more robust:

**General**

- While this response guide might be adequate for a species such as black bear, the grizzly bear in Alberta is a species worthy of *threatened* designation, and so the response needs to be adjusted accordingly. As the Alberta Grizzly Bear Recovery Plan states it, "Bears and humans can coexist on the same landscape if there is a willingness to conduct human activities in ways that are conducive to grizzly bear conservation."
- A goal of the response guide should be to minimize the number of bears removed from the population as a result of conflict situations.

**Nuisance bear definition**

- The draft guide defines a *nuisance* bear as "an animal whose presence is likely to cause some people to feel apprehensive." This definition is inadequate and must be changed. "Apprehensive" is a far too weak word here: any grizzly bear which is going about its own business, without being a threat to anybody, could cause some people to "feel apprehensive." This is more a function of the attitude of the person than any behaviour of the bear. For doing nothing more than exhibiting perfectly normal, safe behaviour, a bear could be trapped and relocated inside or outside the Bear Management Area, or retained in captivity. In fact after two such incidents, such relocation would be mandatory.
- This definition could be strengthened by altering to address what would make a *reasonable person* feel threatened.

**Habituated bear definition**

- The definition of a *habituated* bear includes one which "feeds on agricultural crops in close proximity to humans." Feeding on agricultural crops can be normal healthy bear behaviour. At the very least, "close proximity to humans" should be defined.

**Monitoring of relocated bears.**

- If grizzly bears are captured and relocated, the draft guide recommends that this is done "potentially with ear tag transmitter/GPS collar attached." AWA believes that collaring and ear-tagging should be



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mandatory, not "potential." Also, the guide does not specify any requirement for the bear to be monitored once it has been released. Any relocated bear should be radio-collared and tracked for at least two years.

- The question of where to put relocated bears has not been adequately addressed. Captured bears can only be relocated to areas of suitable grizzly bear habitat. If these areas are already occupied, then there are likely to be considerable impacts both on the relocated bear and on the resident bears into whose territory the bear has been inserted. If these areas are not already occupied by grizzly bears, then there is presumably a good reason why not - the mortality risk is too high in the area, for example. Follow-up monitoring of both the relocated bear *and any resident bears* is crucial.

### Education.

- There is no mention in the document of avoiding bear encounters. This can be done by educating people in a variety of ways, including storage attractants, camping hygiene and hunter safety.
- Often bears only become *habituated* or *problem* bears because of human activity. Responding to the bear should only be carried out in parallel with education and/or enforcement to ensure that the human behaviour which created the problem in the first place is also modified in future.
- This document reinforces the misconception that bears and people cannot coexist. If people encounter bears and "feel apprehensive" then the bear must be moved. This is not appropriate for a species recommended for threatened listing for the past seven years.

### Clarification

- The classification of "cub" is superfluous and can be removed. The only use of the word "cub" in the document is for orphaned cubs, which are defined separately.

### Reporting

- Responses to bear encounters should be reported publicly in a timely fashion.

Yours truly

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