The following is a guest article, Declaration of Support......produced and signed by 26 scientists. The article is a response to the B.C. Gov’ts recent request for comments for reactivated proposals for a South Okanagan Park. Boundary Alliance made its own separate submission online and in the format requested by Gov’t. That online process made no provision for identifying whether the submission came from an individual or group/organization. Unlike similar processes, e.g. submission of comments re Water Act changes, comments/submissions are not being published online. This lack of transparency can hide any public awareness of “stacking” of responses by so called stakeholders.

While we largely support the following Declaration by scientists we do have concerns over a “balanced” approach to cattle grazing in any Park unless that “balanced” approach incorporates an honest assessment of the public and environmental costs of cattle grazing on public land. The absence of any honest “costs” assessment to date has resulted in misleading claims of positive economic values to grazing. See our articles covering this topic at: www.boundaryalliance.org/ba_008.htm

Al Grant for Boundary Alliance.

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**Declaration of Support**

**For Negotiations Leading to a New Framework for Protecting the South Okanagan Lower Similkameen**

We the undersigned, as members of BC’s scientific community, join with Parks Canada, the Province of BC, the Okanagan Nation Alliance, and a majority of local residents, in supporting enhanced protection for the ecosystems of the South Okanagan and Lower Similkameen. We encourage the government of British Columbia, Parks Canada and the Okanagan Nation Alliance to initiate formal negotiations to finalize boundaries, relationships, and commitments for the creation of a National Park Reserve (NPR) and for the long-term protection and management of this remarkable area.

The South Okanagan and Lower Similkameen, the driest, hottest region of Canada, is host to extremely high biodiversity values. This small geographical area is home to one-third of BC’s red-listed and nearly half of BC’s blue-listed species at risk. As the very northernmost extension of the Great Basin biome, the genetics and adaptations of the plants and animals found here are not only important in their own right, but also in a climate-altered future. Much of the area is native grassland, which represents less than one percent of BC’s land base, and less than 8% of BC’s grasslands are in parks or protected areas. Even though portions of map Areas 1 and 3 are designated provincial Protected Areas, they currently receive the same level of management as ordinary Crown land. The South Okanagan/Lower Similkameen has special significance to First Nations and contains sacred cultural and traditional-use sites such as Spotted Lake and the White Lake Basin.

**Background**

In 2012, following 8 years of studies and consultations, the Federal-Provincial National Park Steering Committee determined it was feasible to establish a NPR to represent one of the last Natural Regions (Natural Region 3) not yet in the national park system. The park concept includes a vision for partnerships, gradual land assembly and a long-term transition to a national park reserve, while offering unique educational and visitor opportunities and an innovative...
approach to working with ranchers for ecological and park objectives. The size of the original park proposal was significantly reduced from over 600 sq km to a final conceptual area of 284 sq km. First Nations, who opposed the original Parks Canada (PCA) process, released their own Syilx assessment in 2013, in which they deemed the proposed National Park Reserve feasible and supported moving ahead to negotiations.

Recognizing that additional protection was required, BC put forward the 2015 Intentions Paper for a land protection framework for the South Okanagan/Lower Similkameen, using a combination of provincial tools and national park reserve lands. The Province is seeking feedback on its Intentions Paper. This Declaration expresses support for the principles of the Paper, defines additional principles, and provides input to the questions posed in the Paper. This Declaration also urges all parties to proceed expeditiously, as the rapid pace of land conversion and development in the region may pre-empt the opportunity to create a NPR.

We support additional protection.
We envision a protected area framework with a core NPR as the flagship, surrounded by a variety of ownership, legislation, and approaches for protecting buffers and connecting corridors. The NPR would receive the highest level of ecological protection, funding, and management, setting a “gold standard” for adjacent lands. Provincial parks, protected areas and conservancies could also be managed as peripheral areas of protection, so long as they are adequately resourced. Over the long term, the protected area framework will evolve (including expansion of the NPR), guided by ecosystem-based management and a respectful transition from existing uses. An essential element is strong collaboration and adequate resourcing to enhance overall protection through ecosystem-based management, backed by a strong research and ongoing monitoring effort. The framework should include transborder cooperation with adjacent Washington State.

It should be noted that 284 sq km is not large enough to protect endangered species and ecosystems and it is crucial that the NPR footprint be expanded over time.

We support shared management with the Syilx Bands and the ONA.
On the path towards reconciliation, common ground can be found through the collaborative management of protected lands. First Nation values and rights must be respected, and arrangements pursued for cooperative management. Where appropriate, and as guided by Syilx communities, low-impact non-motorized cultural tourism can be pursued to enrich visitor experience and enhance the local tourism sector.

We support respect for private landowners.
Some private landowners may wish to cooperate with the protected areas framework; others may not. Private land acquisitions would be made through willing seller/willing buyer negotiations. There must be no private land expropriation, or new restrictions placed on private lands. Ranchers wishing to sell their land to PCA should be given that opportunity, whether they ranch in map Area 1, 2 or 3.
We support recognizing existing uses.
Some existing land uses will not be compatible with the proposed protected areas framework. We support a respectful, long-term transition from those current uses as proposed by PCA. We do not support any provision that provides veto power to tenure holders, regarding changes that would be required in order to meet conservation objectives. We do not support the continuation
of illegal existing uses such as ATVing in grasslands (contrary to FRPA Section 46(1) or ATVing in provincial parks, (contrary to the Park, Conservancy and Recreation Area Regulation, Section 24).

**We support a balanced approach to the grazing issue.**

We recognize the issue of livestock grazing is complex, with no simple answers. Livestock grazing is an incompatible use under the National Parks Act, yet ranching has a traditional role that dates back to the 1860’s, and is part of the economic and cultural fabric of the region. We support the current policy that grazed lands purchased by PCA for a NPR will be strictly on a willing seller, willing buyer basis, with a grace period for the removal of livestock, and for intergenerational family ranch transfers. The impact of the NPR on the ranching sector can be more than offset by PCA purchasing additional lands specifically for grazing - but not making them part of the NPR, and by PCA collaborating with and expanding the existing biodiversity ranching initiative in the White Lake Basin. The key native bunchgrasses of the South Okanagan Similkameen did not evolve with significant grazing pressure, and are exquisitely sensitive to overuse. In order to be sustainable, livestock grazing rotations must be very conservative and include season-long rest periods.

The following section contains our responses to questions posed in the Intentions Paper.

**Question 1: Are the appropriate areas captured in the overall land protection framework?**

**Our Response:** The protected area framework needs to recognize and respond to critical values outside of core protected areas such as biodiversity hotspots, habitat for species at risk, ecological connectivity (landscape-level connectivity as well as locally important corridors), and a broad Syilx vision for cultural and ecological integrity. A broader ‘Area of Cooperation’ (see map) around core protected areas should be defined using a collaborative and science-based approach. Within this area, numerous parties would work cooperatively towards the sustainability, ecological stewardship and watershed protection required to achieve landscape-level sustainability objectives.
Question 2: Are there any adjacent lands of particular conservation, recreation or cultural heritage value that should be included in Area 1?

Our Response: Mount Kobau and Kilpoola North Protected Areas must be included within NPR Area 1 as they were established for the protection of federally listed species at risk, a mandate PCA has the authority and resources for.

An access corridor between current Area 1 and Mount Kobau/Kilpoola will also need to be established.

The southeastern boundary of Area 1 (Osoyoos West Bench) should be moved eastward slightly to capture the habitats of several federally red-listed species.

Question 3: Are there any special considerations that should be taken into account in establishing additional protection for Area 1?

Our Response: Due to the sensitivity of this area, facilities for casual visitors should be located adjacent to Highway 3, with the interior area reserved for guided tours and low-impact, foot-based nature tourism. Led by First Nations, a cultural and viewing facility adjacent to Spotted Lake could be developed.

Question 4: Are there any adjacent lands of particular conservation, recreation or cultural heritage value that should be included in Area 2?

Our Response: A connectivity corridor should be established between Areas 1 and 3, that eventually becomes part of the NPR. In order to achieve this, PCA should be given the right to purchase appropriate private lands (and associated cattle grazing tenures) within Area 2, on a willing seller, willing buyer basis. Oliver Mountain, with its high biodiversity values and endangered species, should be fully protected as part of this corridor.
Question 5: Are there any special considerations that should be taken into account in establishing additional protection for Area 2?

Our response: As our climate warms, maintaining healthy ecosystems and good ecological connectivity within Area 2 and to other areas, e.g. Snowy Protected Area, will be essential for the successful migration of newly-adapted native species, thus reducing opportunities for alien species invasions. If the Province and First Nations decide to create a transitional provincial conservancy in Area 2, it should be managed to an equivalent standard as the NPR.

Question 6: Are there any adjacent lands of particular conservation, recreation or cultural heritage value that should be included in Area 3?

Our response: Ecological and SARA objectives for the NPR cannot be reached without additional land purchase in White Lake-Vaseux area. Area 3 should be extended along the east side of Vaseux Lake, connecting it to the following important entities: The Nature Trust Antelope Brush property, the lower portion of Vaseux Bighorn National Wildlife Area, the Vaseux Important Bird Area, the South Okanagan Rehabilitation Centre for Owls, and the McTaggart-Cowan Wildlife Management Area.

Question 7: Are there any special considerations that should be taken into account in establishing additional protection for Area 3?

Our response: PCA will need to participate in the existing Nature Trust Biodiversity Ranch initiative, and develop cooperative partnerships with the National Research Council and the Canadian Wildlife Service. Canadian Wildlife Service lands should be managed to the national park reserve standard, whether they are transferred to Parks Canada or not.
RESPECTFULLY SIGNED,

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Tags: Protected Areas Framework for British Columbia’s South Okanagan, South Okanagan National Park, South Okanagan Similkameen National Park