



Alberta Wilderness Association

March 18, 2008

Ms. Carolyn Seburn
Recovery Science Specialist
Canadian Wildlife Service
By electronic mail
carolyn.seburn@ec.gc.ca

Re: Comments on the proposed SARA Recovery Strategy for Sprague's Pipit (*Anthus spragueii*) in Canada (2008)

Dear Ms. Seburn,

We appreciate the opportunity to comment on the proposed SARA Recovery Strategy for Sprague's Pipit. We commend the authors and the Recovery Team for their good work in preparing this proposed Recovery Strategy. However, we strongly disagree with the proposed timeline for the identification of critical habitat.

Section 41. (1)(c) of SARA states that a recovery strategy must include an "identification of the species' critical habitat, to the extent possible, based on the best available information". The proposed Recovery Strategy does not identify critical habitat for Sprague's Pipit. The reason provided in the proposed recovery strategy for not identifying critical habitat is as follows: "Critical habitat will be identified in an Action Plan in 2011 because currently there is a lack of adequate information to determine what habitat is necessary for the survival and recovery of this species. Although Sprague's Pipits are known to occur more often and in greater densities on larger parcels of native grassland, the amount, location and fine-scale attributes of habitat required are currently unknown. It will be an arduous task to accomplish and a series of studies is required to fill important information gaps before critical habitat can be effectively delineated across the Canadian breeding range of Sprague's Pipit."

While we agree that there are challenges to identifying critical habitat for this species with the information currently available, we find that the lengthy proposed delay in identifying critical habitat is unjustified and adds additional risk to the survival of Sprague's Pipit in Canada. We believe that the fieldwork required to identify much of the critical habitat could be carried out this breeding season (April to July, 2008) and that critical habitat could be identified in all large parcels of native grassland on federal crown land across most of the Canadian breeding range of Sprague's Pipit, by spring 2009 at the latest. Critical habitat could readily be identified within the Suffield National Wildlife Area in Alberta and Grasslands National Park in Saskatchewan, and by GIS work overlaying Breeding Bird Survey data, application of adjusted models from the Alberta grassland bird modeling project (Franken et al. 2003), Conservation Data Center data and Alberta Fish and Wildlife data on Sprague's Pipits with native grassland blocks.

It is worth noting that many of the knowledge gaps listed in the proposed Recovery Strategy are not obstacles for identifying critical habitat, but research projects related to other aspects of effective recovery actions. These gaps only address prairie region habitats whereas the Sprague's Pipit population extends well into the parkland region which is barely mentioned in this plan. SARA requires that critical habitat be identified based on the "best available information". It does not require absolute scientific certainty. Furthermore, critical habitat and recovery strategies may be revised as additional information becomes available and experience accumulates. This is also in tune with adaptive management, which is a key approach for conservation. Given existing threats, delaying identification of critical habitat to 2011 is not justified and is contrary to the precautionary principle in Section 38 of SARA.

Continued loss of breeding habitat is part of the rationale for the designation of this species as threatened and an ongoing threat to Sprague's Pipit. At the current rate of prairie grassland habitat loss, it is crucial to protect remaining breeding habitat for this rapidly declining species if the recovery goals are to be attained. Focusing on Crown native prairie grasslands as an immediate first step of identification of critical habitat will reinforce other conservation efforts and benefit other species at risk in those areas. At a minimum, critical habitat should be identified in Suffield National Wildlife Area in Alberta; and in Saskatchewan, within Grassland National Park and Govenlock-Nashlyn-Battle Creek Grasslands IBA in Consul. It is of particular importance to identify critical habitat at Suffield NWA, because currently available habitat at that site is under immediate threat from gas development.

Also, we believe that communications and outreach efforts should focus more on the habitats (i.e. native prairie) that sustain this pipit species, and less on the pipit itself because protecting native prairie benefits a wide suite of native species, many of which are at risk.

Finally, as a matter of lesser importance, we reiterate our suggestion that it would be useful to include the residence definition in the Recovery Strategy itself, rather than only providing the link to the registry.

Sincerely,

Ted Cheskey
Conservation Ecologist
Nature Canada
tcheskey@naturecanada.ca
Phone 1-800-267-4088

Christyann Olson, MScA
Executive Director
Alberta Wilderness Association
awa.ed@shaw.ca
Phone: 403.283.2025