



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Director General,
Canadian Wildlife Service,
Environment Canada,
Ottawa ON,
K1A 0H3
Via Email: sararegistry@ec.gc.ca

February 5, 2014

Dear Director,

Re: Consultation on Amending the List of Species under the Species at Risk Act

Thank you for the opportunity to comment on the above consultation.

Alberta Wilderness Association (AWA) works throughout Alberta towards more representative and connected protection of Alberta's unique and vital landscapes that are the source of our abundant clean water, clean air and vital habitat for wildlife in each one of our six natural regions. We have been working in Alberta for more than forty years, to raise the profile of Alberta's spectacular wilderness, and to help Albertans learn more about the value of our wilderness and wildlife, and participate in opportunities to protect and care for the legacy that we will leave for future generations. With over 7000 members and supporters, AWA remains committed to assuring protection of wildlife and wild places for all Albertans.

Generally, AWA recognizes that lack of protected habitat is a theme which runs throughout the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) summaries included in this consultation. When progress on provincial protection of habitat for endangered species is as slow as it is in Alberta, the use of federal Species-at-Risk legislation is also frustratingly slow. AWA is disappointed that the federal government may very well miss the opportunity to protect habitat for endangered and threatened grassland species by choosing not to protect habitat in the One-Four Ranch and Research Station before passing these lands over to the province of Alberta.

AWA would also reiterate our concerns, (expressed in a letter dated May 12, 2012, attached) at the federal government's decision not to add three endangered species, Laura's Clubtail, Coast Manroot and Four-leaved Milkweed, to Schedule 1 of SARA because of their "peripheral" distribution in Canada, this despite the recommendation of COSEWIC to do so.

Please accept the following as AWA's official comments on the consultation.

Bank Swallow

AWA supports the recommendation by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) to designate Bank Swallow as a *threatened* species under the Species at Risk Act. The fact that 98% of the species' Canadian population has been lost over the last 40 years is a serious cause for concern, and makes the need for a timely recovery process particularly urgent.

Gibson's Big Sand Tiger Beetle

AWA supports the recommendation by the COSEWIC to designate Gibson's Big Sand Tiger Beetle as a *threatened* species under the Species at Risk Act. AWA notes that "The main threat to Gibson's Big Sand Tiger Beetle in Canada is the loss of suitable habitat due to continued stabilization of dunes by vegetation." AWA is disappointed that the federal government missed the opportunity to protect habitat for endangered and threatened grassland species by choosing not to protect habitat in the former One-Four Ranch and Research Station before passing these lands over to the province of Alberta.

Greenish-white grasshopper, Western Tiger Salamander and American Badger

AWA supports the recommendation by the COSEWIC to designate these species as *special concern* species under the Species at Risk Act. AWA notes with concern that the province of Alberta still considers American Badgers as *Data Deficient*, Despite the fact that COSWEIC notes "The lack of monitoring of total mortality, the limited amount of habitat in cultivated areas, ongoing threat of roadkill, and the projected use of strychnine leads to concern for the species in a large part of its range" management decisions are still being made which are likely to impact populations, including industrial road construction and the projected use of strychnine in the province.

AWA will provide comments relating to the status of Bull Trout (Saskatchewan - Nelson Rivers and Western Arctic populations) prior to the October 23, 2014 deadline associated with the extended consultation path.

Yours truly,
ALBERTA WILDERNESS ASSOCIATION



Brittany Verbeek,
Conservation Specialist

cc: Hon. Robin Campbell, Alberta Minister of Environment and Sustainable Resource Development