



Dear {FIRST_NAME|Wilderness Defender},

A message to all you native fish lovers! At the end of last year, the federal government released a *Proposed Recovery Strategy for Westslope Cutthroat Trout (Oncorhynchus clarkii lewisi) Alberta Population*.

After consulting with many leading fish biologists in Alberta and British Columbia, AWA has concerns regarding the proposed Recovery Strategy. In particular we believe that the critical habitat identification is not consistent with the requirements of the Species at Risk Act (SARA) and is inadequate for the successful recovery of westslope cutthroat trout.

We encourage you to submit comments to push for the increase in critical habitat designation for this threatened native species. The consultation period on the Species at Risk Public Registry ends February 22, 2014 but Fisheries and Oceans Canada will accept comments until March 31, 2014.

Thank you for your participation!

Brittany Verbeek
Conservation Specialist

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Westslope Cutthroat Trout Recovery Strategy

AWA

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Contacts to submit your comments

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Department of Fisheries and Oceans
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Honourable Leona Aglukkaq
Minister of the Environment
House of Commons
Parliament Buildings

Ottawa, ON K1A 0A6

Via email: Minister@ec.gc.ca

Fill out the online comment form at:

http://www.registrelep-sararegistry.gc.ca/document/default_e.cfm?documentID=1304

Highlights of AWA's comments

In order for this Recovery Strategy to be consistent with SARA's requirements, and to successfully recover westslope cutthroat trout populations, the identification of critical habitat must be substantially expanded beyond the current identification in the proposed recovery strategy as:

"...all areas of bankfull waterbodies currently occupied by naturally occurring, pure strain populations within the original Westslope Cutthroat Trout distribution."

AWA believes this is not using the best available information and that there is abundant scientific evidence to support the following expansions to the critical habitat:

- 1. Critical habitat designation needs to be expanded beyond where westslope cutthroat trout currently exist into areas suitable for population restoration.**
- 2. Critical habitat designation needs to include riparian vegetation zones surrounding trout bearing streams and any streams that have potential to provide habitat for re-established populations within the species' historical range.**
- 3. Critical habitat designation needs to include key parts of the watershed responsible for ground water storage.**
- 4. Critical habitat designation needs to include the active flood plain as an important buffer to trout bearing streams and any streams that have potential to provide habitat for re-established populations within the species' historical range.**
- 5. Critical habitat designation needs to include permanent and ephemeral tributaries upstream of trout bearing streams and any streams that have potential to provide habitat for re-established populations within the species' historical range.**

The Species at Risk Act does not permit the inclusion of socio-economic impacts as part of the assessment of critical habitat. We see no biological reason to exclude these important and well known landscape elements that AWA has listed above (1-5) from the critical habitat identification of westslope cutthroat trout. If there is no inclusion of these elements within the critical habitat, Department of Fisheries and Oceans (DFO) needs to provide a scientific rationalization

that justifies their exclusion. Given our review of the voluminous literature on these topics we believe no such scientific rationalization is possible without implicitly and unlawfully including socioeconomic considerations in the critical habitat identification.

To read AWA's full letter click [here](#).

To read the *Proposed Recovery Strategy for Westslope Cutthroat Trout* click [here](#).

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