



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Director General
Canadian Wildlife Service
Environment Canada
Ottawa, Ontario
K1A 0H3

January 10, 2010

Dear Director General

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.

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

Whitebark pine/ Limber pine

AWA strongly supports the recommendation by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) to designate whitebark pine as an *endangered* species under the *Species at Risk Act*. We are slightly surprised that limber pine, which faces many of the same risks as whitebark pine, has not been recommended for the same status, and would hope that its status will be reviewed soon.

Bert's predaceous diving beetle

AWA is supportive of the addition of Bert's predaceous diving beetle as an *endangered* species. Considerable support will obviously be required from the Government of Alberta if this species is to persist in its two (possible) locations on the Oldman River.

Western blue flag

AWA does not oppose downlisting of western blue flag (from *threatened* to *Special concern*). We accept the COSEWIC suggestion that "the area occupied and total population size of native plants are now known to be larger than previously determined."

Swift fox

AWA does **not** support the recommendation by COSEWIC to downlist the Swift fox (from *endangered* to *threatened*). We believe such a downlisting would be premature, for a number of reasons:

- **Inconsistent population data.** The November 2010 document, *Consultation on Amending the List of Species under the Species at Risk Act: Terrestrial Species*, states that “Population numbers and distribution have increased since (1983), with the current estimate in Canada having doubled to 647 since the last COSEWIC assessment in 2000.” And yet the August 2001 report, *Census of Swift Fox (*Vulpes velox*) in Canada and Northern Montana: 2000-2001* (A. and C. Moehrensclager) estimates the swift fox population in Canada in 2000-2001 as 656 individuals: “Application of the same population estimation technique utilized in 1996-1997 suggests that the Alberta/Saskatchewan border population consists of 560 individuals (compared to 192 previously), the Grasslands National Park area contains 96 individuals.”

How can COSWEIC refer to a population going from 656 individuals to 647 as having “doubled”?

- **Habitat “saturation”.** The document, *Consultation on Amending the List of Species under the Species at Risk Act: Terrestrial Species*, states that “Since 2001, population numbers and distribution have remained stable and habitat for this species within Canada *appears to be saturated*” (emphasis added). If “habitat” is interpreted as those areas where swift foxes have been reintroduced, then it may be the case that this habitat is “saturated.” But of course the historical range of swift foxes in Canada is far broader than this narrow definition. The 2001 *Census of Swift Fox (*Vulpes velox*) in Canada and Northern Montana: 2000-2001* (A. and C. Moehrensclager) recognizes that “Before European settlers arrived, swift foxes were found in Canada from the Pembina Hills in Manitoba across southern Saskatchewan to the southern foothills of the Rocky Mountains in Alberta.”

The recommendation to downgrade protection of swift foxes appears to prematurely preclude any further recovery into their former range.

- **Recovery.** In the January 2008 Parks Canada report, *Recovery Strategy for the Swift Fox (*Vulpes velox*) in Canada*, recovery is defined as: “the process by which the decline of an endangered, threatened or extirpated species is arrested or reversed, and threats are removed or reduced to improve the likelihood of the species’ persistence in the wild. A species will be considered recovered when its long-term persistence in the wild has been secured.” And yet the report *Consultation on Amending the List of Species under the Species at Risk Act: Terrestrial Species* November 2010 states “Habitat loss, degradation and disturbance from development activities is a growing concern within Swift Fox Range.”

AWA believes that, in the face of continuing habitat loss and degradation, the downgrading of the Swift fox (from *endangered* to *threatened*) is not appropriate.

Bobolink

AWA supports the recommendation by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) to designate bobolink as a *threatened* species under the *Species at Risk Act*.

Chestnut-collared longspur

AWA supports the recommendation by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) to designate Chestnut-collared longspur as a *threatened* species under the *Species at Risk Act*.

Yours truly

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink, appearing to read 'ND', is positioned to the right of the name Nigel Douglas.

Nigel Douglas,
Conservation Specialist

cc: Hon. Mel Knight, Alberta Minister of Sustainable Resource Development