



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Caroline Ladnowski
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September 27, 2012

Dear Director Ladnowski

Re: Consultation on Amending the List of Species under the Species at Risk Act: Terrestrial Species – December 2012 (Grizzly Bear; Western population)

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 comment on the consultation.

Grizzly Bear – *Ursus arctos* (Western population)

AWA strongly supports the recommendation by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) to designate the Grizzly bear (Western population) as a *Species of Special Concern* under the Species at Risk Act (SARA).

The grizzly bear has already been eliminated from much of its traditional territory stretching across the prairie provinces from Alberta into Manitoba. Where it does remain, its remaining habitat is being significantly impacted by human activity and development, most especially high levels of human "linear" access that threatens to fragment that habitat.

As a consequence of this fragmentation, many remaining populations are small and isolated. This is especially the case in Southern Alberta and British Columbia where barriers such as highways reduce the

connectivity between regional populations. The last official census taken in Alberta showed approximately 700 grizzly bears remaining in that province, but with several populations having much smaller numbers than that being effectively isolated and with very low reproductive rates.

Numerous grizzly studies have also drawn a clear link between high levels of human linear access and high population - especially cub and infant - mortality. For example, the Government of Alberta Grizzly Bear Recovery Plan 2008 - 2013 notes:

“Grizzly bear mortality has been linked to proximity to roads. Roads and other access corridors increase the frequency of contact between humans and bears, which can lead to increases in human-caused bear mortality – **human use of access (specifically, motorized vehicle routes) one of the primary threats to grizzly bear persistence.**” (emphasis in original)

It is hoped that a listing on the SARA registry can provide a tool to help manage more appropriately access management issues in grizzly habitat. As noted in the 2012 COSEWIC Assessment and Status Report on the Grizzly Bear, most grizzly habitat in Canada is publically owned. The cumulative impacts from multiple uses of this land base (forestry plus mining plus oil and gas plus recreation, etc.) combine to provide considerable threat to the sustainability of the grizzly and need better management if the species is to survive. While this is especially true now in the southern portions of the grizzly range as noted above, it can be expected to become an increasingly pertinent concern in the northern portions as well, as development pressures increase in those regions.

For these regions especially, AWA believes the grizzly needs, and will benefit from, the proposed SARA Schedule 1 listing.

Yours truly

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Sean Nichols,
Conservation Specialist

cc: Hon. Diana McQueen, Alberta Minister of Environment and Sustainable Resource Development