



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

December 22, 2014

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Re: Proposed Recovery Strategy for the Greater Short-horned Lizard in Canada

Thank you for the opportunity to provide comments on the *Proposed Recovery Strategy for the Greater Short-horned Lizard in Canada*. 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 almost fifty 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 more than 7000 members and supporters, AWA remains committed to assuring protection of wildlife and wild places for all Albertans.

Following are our concerns and comments regarding the proposed recovery strategy, we look forward to a reply at your earliest convenience.

Population and Distribution Objectives

The population and distribution objectives (Section 5) for the *Greater Short-horned Lizard* are inadequate to *recover* the species as required by the federal *Species at Risk Act*.

- AWA notes that the proposed Strategy is a *Recovery Strategy*, yet the stated objectives are to “*maintain* the current area of occupancy of the species,” (emphasis added). Instead of seeking to “maintain” the inadequate area of current occupancy, the final Strategy must seek to *increase* the area of occupancy; otherwise recovery is impossible.
- Given that the proposed strategy notes that “many other areas of apparently-suitable habitat are currently unoccupied,” it must become an objective in the final strategy to *expand* the area of occupancy, not just *maintain* it.
- The proposed strategy (*Population and distribution*, p4) lists 2,457 km² of land where short-horned lizards occur in Alberta and Saskatchewan. This compares with a 132-km² area of occupancy in both provinces. If only 5 percent of the area is currently occupied, there must be opportunity to expand current occupancy.

Lack of urgency

- The *Greater Short-horned Lizard* was designated an *endangered* species in 2007 (after having been designated as *special concern* in 1992). Why has it taken seven years to produce a proposed recovery strategy?
- The suggestion that “One or more Action Plans for the Greater Short-horned Lizard will be completed by 2018” again reflects a lack of urgency.

Lack of clear and immediate on the ground action

- While the proposed strategy notes the need for recovery actions, it is very vague about what those actions will be. The proposed strategy proposes “a number of approaches to implement the broad strategies” but how these “approaches” will lead to direct on-the-ground improvements to lizard habitat and populations is not explained.
- There appear to be no concrete measures to address ongoing losses of lizard habitat, or to expand occupancy of current range. Suggested recovery actions are mostly focused on “monitoring and assessment”, “research”, and “communication” none of which will do anything to recover lizard habitat. The only practical recovery measures – “development of beneficial management practices and stewardship agreements” – are likely to be voluntary.
- If, as the proposed strategy suggests, the immediate threats to the short-horned lizard are “the conversion of native habitat to industrial infrastructure,” and “the creation of roads in native habitat,” then, if nothing else, the strategy should have a target of protecting all remaining habitat, and immediate halting of all new road construction in lizard critical habitat. Beyond this, there should be longer-term targets of restoring damaged habitat and reducing existing road densities in all identified lizard habitat.

Protected habitat

- Less than one percent of Alberta’s Dry Mixedgrass Subregion is protected. The final strategy needs firm targets for increased legislated protection (provincial and federal) of short-horned lizard habitat. The Department of Agriculture and Agrifood Canada is relinquishing the Onefour Research Farm with no comprehensive public involvement about its future protection yet it contains habitat for almost two dozen federally listed species at risk, including Greater Short-horned Lizard. Recovery plans need to identify lands (leased or owned by the federal Crown) that will continue to contribute to recovery. The Government

of Canada needs to retain these lands under federal control or put in place binding agreements with the provinces to protect habitats and species on those lands if they are to relinquish control of provincially leased lands.

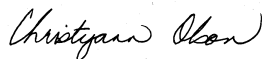
- The proposed strategy does not mention the need to improve connectivity between populations and subpopulations.

Threats

- The proposed strategy very much underplays oil and gas activity as a threat to short-horned lizards, and the 2-paged summary document fails to mention it at all. COSEWIC's 2007 *Assessment and status update report* was clear that "(p)opulations are threatened by ongoing oil and gas development, proliferation of roads, proposed mineral development, and an increasing human presence." The final recovery strategy should be equally clear.
- How "conversion of native habitat to industrial infrastructure" and "creation of roads in native habitat" are only defined as a *medium* concern (*Threat assessment, p7*) is a mystery!

Lastly, we urge the Government of Canada to strengthen its communications with local landowners and leaseholders as well as federal programs that will bring significantly greater resources to local communities wishing to assist with protection of these at risk habitats and species. Currently, there is very little resourcing being put into one of Canada's most endangered natural regions (grasslands) which houses a disproportionately large number of its species at risk.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION



Christyann Olson
Executive Director