



Alberta Wilderness Association

April 4, 2024

Species at Risk Public Registry Office  
Environment and Climate Change Canada  
351 St. Joseph Blvd - 21st Floor  
Gatineau, QC K1A 0H3  
By email: [SARAREgistry@ec.gc.ca](mailto:SARAREgistry@ec.gc.ca)

**RE: Proposed down-listing of the Small-flowered Sand-verbena under SARA**

To whom it may concern,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide comments on the proposed change to the Schedule 1 status of the Small-flowered Sand-verbena (*Tripterocalyx micranthus*) from endangered to special concern under the *Species at Risk Act* (SARA). Given the severity of threats, predicted habitat declines, current population estimates, and knowledge gaps with respect to the species' lifecycle, AWA strongly encourages ECCC retain the species' current status as endangered under SARA.

Founded in 1965, Alberta Wilderness Association strives to help Albertans understand the intrinsic values that wildlife and wilderness provide and encourage communities to participate in conservation initiatives that will ensure a legacy for future generations. With over 7,000 members and supporters in Alberta and across Canada, AWA is dedicated to conserving Alberta's wilderness and wildlife, advocating for conservation strategies that protect Canada's biodiversity.

Increased protection for wildlife species, including the Small-flowered Sand-verbena and their respective habitat, is integral to AWA's vision of an ecologically representative network of protected areas throughout Alberta. The Small-flowered Sand-verbena populations are also located in AWA's Middle Sand Hills and Milk River-Sage Creek areas of concern, which are biodiversity hotspots in the grasslands of southeastern Alberta.

AWA is concerned that down-listing the status of the Small-flowered Sand-verbena would not offer the species' current populations sufficient protection, nor ability to increase considering:

- **There is insufficient data to determine population trends, but a decline is inferred based on threats.** The population distribution range is still restricted

enough to qualify the species as endangered, and the number of mature individuals is below the threshold for species considered threatened. Increases in population counts are associated with improved survey efforts rather than measured population growth.

- **There is an inferred continuing decline in the extent and quality of habitat.** Alberta's Grasslands Natural Region is one of the most diverse and least protected regions in the province, with over 70 % of native prairies already lost. Habitat degradation and destruction from agriculture, development, industry, recreation, and transportation continues to threaten the region. Active sand dunes, which the species relies on, have also suffered increasing loss due to stabilization from changes in precipitation and a loss of fire from the prairies. This is further complicated by the increasing frequency and severity of extreme weather events.
- **The species' threats are still unaddressed.** Dune stabilization, fire suppression, altered grazing regimes, climate change, invasive species, and encroachment remain ongoing concerns for the species' viability.
- **Seed bank knowledge for species is limited.** The reasons provided to downlist the Small-flowered Sand-verbena rely on the continued health and function of the species' seed bank to replenish populations, while also acknowledging the extent and distribution of the seed bank is not well known. It is also recognized that the specific environmental conditions the species requires to germinate are expected to appear less frequently in the future, further complicating this reliance on the seed bank.

SARA's purpose is to recover endangered and threatened species that are at risk because of human activity. This purpose has not been fulfilled for the Small-flowered Sand-verbena, as the threat from human activity still persists; the downlisting was not recommended based on success of conservation efforts like "maintaining native-dominated mixed-grass prairie vegetation with some bare soil exposure..., using fire, livestock and other tools, and control of invasive alien species with chemical, biological and cultural tools" as endorsed in the 2012 Recovery Strategy, but because the designation criteria changed. While survey efforts have identified more populations, these populations would assumedly still be at risk without addressing the species' threats. Downlisting would also remove prohibitions against killing, harming, harassing, capturing, possessing, or collecting Small-flowered Sand-verbena which they are currently afforded as an endangered species, as well risking protections on identified critical habitat.

For these reasons, AWA strongly encourages the minister retain the Small-flowered Sand-verbena's endangered status. If there is a need to down-list to reflect that there are higher populations than expected, then AWA recommends the status be changed instead to threatened. This would be consistent with the precautionary principle as there is not sufficient evidence to suggest the species is not still declining.

Thank you for considering these comments. We look forward to hearing your decision.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink, appearing to read 'Kennedy Halvorson', with a long horizontal flourish extending to the right.

Kennedy Halvorson  
Conservation Specialist