



Canadian Section of The Wildlife Society

"The mission of the Canadian Section of The Wildlife Society is to foster excellence in wildlife stewardship through science and education among wildlife professionals in Canada"

To: Environment Canada
9250 – 49 street
Edmonton, Alberta
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From: Jim Allen
Chair, Conservation Affairs Committee

Regarding: The Amended Recovery Strategy for the Greater Sage-Grouse in Canada

This document is well written, comprehensive and easy to understand. The identification of critical habitat for leks, nesting, brood rearing and wintering of the species is well done and we support the notion that this identified habitat is considered sufficient for recovery. We also support the use of the Emergency Order for the Protection of the Greater Sage-Grouse to address imminent threats of the Sage Grouse within the habitat that is necessary for their survival and recovery.

A concern we would like to raise is that the degradation of habitat, particularly mesic brood rearing habitat, by agricultural activity (grazing), is under emphasized in the strategy. The document speaks to drought as potentially causing great impact because of associated over grazing. Drought is a natural cyclical condition in this area and overgrazing should not be considered a given during drought years. Grazing regimes should be designed for a better response to drought conditions to meet the 25% to 45% forage utilization target.

Unfortunately the Emergency Order does not subject ranchers and other landowners in Greater Sage-grouse range to the same scrutiny and oversight as other industries. As a result there exists significant potential for negative impacts to accrue if a landowner is economically stressed or is not interested in trying to balance their activities with the needs of an endangered species. At this stage in Greater Sage-Grouse recovery we may be beyond the point where we can rely on the goodwill of landowners to do the right thing(s), we need to require it.

Regards