

Recovery Planning  
Environment Canada  
15th Floor, Place Vincent Massey  
351 St. Joseph Boulevard  
Gatineau, QC  
K1A 0H3  
SARA.PNR@ec.gc.ca

**Re: Proposed Recovery Strategy for the Dusky Dune Moth (*Copablepharon longipenne*) in Canada**

On behalf of the Canadian Parks and Wilderness Society – Southern Alberta Chapter (CPAWS SAB), please accept these comments on the proposed Recovery Strategy for the Dusky Dune Moth.

The Canadian Parks and Wilderness Society (CPAWS) is Canada's voice for wilderness protection. CPAWS envisages a healthy ecosphere where people experience and respect natural ecosystem, and believes that by ensuring the health of the parts, we ensure the health of the whole. Since 1963, we've played a lead role in creating more than two-thirds of Canada's protected areas. With 13 chapters across the country we have developed a credible reputation for protecting natural spaces by working collaboratively with stakeholders, government and first nations.

The southern Alberta (SAB) chapter's role of CPAWS is to provide large landscape scale, science-based support and advice for the conservation and protection of Alberta's protected areas and wildlands. We aim to protect wild ecosystems in parks and wilderness, and to preserve the full diversity of habitats and species. We promote awareness and understanding of ecological principles and the inherent values of wilderness while encouraging individual action to accomplish conservation objectives.

While the proposed Recovery Strategy for the Dusky Dune Moth thoroughly identifies current knowledge and knowledge gaps on the species as well as threats to the species, the strategy is lacking in a number of other important areas.

*Habitat Protection and Population Goals*

The population and distribution objectives for the Dusky Dune Moth stated in the Proposed Strategy are "to maintain or increase the current distribution of the species at all confirmed and natural locations, as well as at any additional natural locations discovered in the future". This is a good start, however as this is a recovery strategy the objectives set should also aim to increase population and distribution of the species.

Defining the area of critical habitat as only areas with confirmed current occupancy of Dusky Dune Moth populations will not help to recover or expand the species. As the critical habitat designation does not facilitate expansion this strategy will not work towards genetic connectivity. Critical habitat should also include areas of high habitat value with the potential for expansion of Dusky Dune Moth populations into these areas in the future.

*Implementation of the Strategy*

One of the major weaknesses of this strategy is found in the lack of a clear plan that will lead to

recovery of the species. There are four sections laid out in the Strategic Direction for Recovery, but no solid plan describing how they will be enacted. The path that the plan for recovery will take is described in a very broad manner and does not provide specific actions that will be taken or targets to be reached. The Recovery Strategy would benefit from a timeline for both actions and goals that will lead to recovery. This should include specifics on filling knowledge gaps on the life history and requirements of the species, surveys to be conducted and conservation and habitat management actions.

The plan should target protecting all remaining Dusky Dune Moth habitat, and not primarily focus on research and survey efforts. In the Strategic Direction for Recovery, the sections “Inventory and Monitoring” and “Research” are listed as urgent in priority. Meanwhile, “Habitat Assessment, Management and Conservation” is listed only as necessary. Higher priority should be placed on the actual management and conservation of this species, as this is the part of the Recovery Plan that will do the most to protect and eventually work to recover the species.

Another concern is the timeline for the implementation of this Recovery Plan. The Recovery Plan indicates that the action plan is to be completed by 2020. CPAWS SAB is concerned about the slowness of this whole process as the species is currently limited in numbers and depends on habitat patches that are small, fragmented and progressively declining. As threats continue to affect the Dusky Dune Moth actions to prevent threats that are most harmful to the critical habitat and the species should be identified and implemented as soon as possible.

#### *Mitigation of Threats*

There is no strong commitment to prevent harmful activities from occurring in critical habitat areas in the short term. The threats to the species have been clearly laid out in the Recovery Plan and actions to prevent the most harmful activities from occurring should be implemented immediately, especially those that will degrade Dusky Dune Moth habitat through sand dune stabilization and the invasion of exotic species.

The final strategy needs firm targets for increased legislative protection at provincial and federal levels of Dusky Dune Moth habitat, which is also a hotspot for many other rare and threatened species. As grassland habitats are the least protected ecoregions in Canada, we feel very strongly that these diverse regions need to be conserved. A commitment to work towards management and conservation with stakeholders, conservation organizations and local residents and landowners needs to be made in order to ensure the protection of the Dusky Dune Moth as well as all other sand dune specialist species.

CPAWS SAB appreciated this opportunity to review and provide comments on the Proposed Recovery Strategy for the Dusky Dune Moth. We look forward to a response and a strengthening of this Recovery Strategy.

Sincerely,



Katie Morrison, M.E.Des, P.Biol.  
Conservation Director  
CPAWS Southern Alberta Chapter