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Re: Proposed Recovery Strategy for the Greater Short-horned Lizard (*Phrynosoma hernandesi*) 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 Greater Short-horned Lizard.

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 thorough identifies habitat requirements and threats to the species CPAWS SAB has a number of concerns.

Population and Distribution Objectives

The proposed Recovery Strategy states that "The population and distribution objective for the Greater Short-horned Lizard is to maintain populations in all of the critical habitat polygons within the 8 currently known areas of occupancy of the species plus any new populations discovered in the future." Given that this document is a recovery strategy the objective should be to recover these populations and expand the distribution rather than to only to maintain the population and distribution of short-horned lizards. Defined Critical Habitat should include areas of high habitat value with the potential for expansion of populations into these areas.

Implementation of Recovery

This proposed Recovery Plan lays out a broad general strategy for recovery of the species but does not provide a real timeline or specifics of how the recovery will be achieved. There is no strong commitment to prevent harmful activities from occurring in critical habitat areas, particularly expansion of industrial development such as oil and gas development. COSEWIC's 2007 *Assessment and status update report* identified these activities as a major threat to greater short-horned lizards stating that "(p)opulations are threatened by ongoing oil and gas development, proliferation of roads, proposed mineral development, and an increasing human presence." The Plan should have a target of protecting all remaining habitat and indicate that all activities that have been identified as detrimental to the critical habitat or to the species directly will be avoided in critical habitat for Greater Short-horned Lizard.

CPAWS SAB is also concerned about the timeline for implementation of the Recovery Plan. Although the Plan provides a broad timeline for studies to identify critical habitat, which is a good first step, the proposed actions and measurement of progress do not adequately address the urgency of species recovery. The Plan indicates that the action plan is to be completed by 2018. As threats continue to affect the Greater Short-horned Lizard actions should be immediately identified and implemented. Suggested recovery actions are mostly focused on "monitoring and assessment", "research", and "communication" none of which will do anything to recover lizard habitat.

Protection of Habitat

Protection must be provided for the species against the most harmful activities. The final strategy needs firm targets for increased legislated protection (provincial and federal) of short-horned lizard habitat and create connectivity between habitats to allow populations to expand and recover.

Grassland habitats are the least protected ecoregions in Canada. The Plan should commit to working with stakeholders, conservation organizations and local landowners and leaseholders on designating new protected areas in grasslands habitat that will protect greater short-horned lizard and other grassland species.

CPAWS SAB appreciates the opportunity to provide comments on the proposed Recovery Strategy for the Greater Short-horned Lizard. We look forward to a response and strengthening of this Recovery Strategy.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Katie Morrison', written in black ink.

Katie Morrison
Conservation Director
CPAWS Southern Alberta Chapter