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Re: Proposed Recovery Strategy for the Smooth Goosefoot (*Chenopodium subglabrum*) 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 Smooth Goosefoot.

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 Smooth Goosefoot thoroughly identifies threats to the species as well as species characteristics and needs, the strategy is lacking in a number of other important areas.

Habitat Protection and Population Goals

The proposed Recovery Strategy states that "The population and distribution objectives for the Smooth Goosefoot is to maintain all extant and any newly discovered naturally occurring populations within the natural range of population fluctuation, within the current range of the species in Canada, and to reconfirm historic and unconfirmed populations to the extent possible." Given that this document is a recovery strategy the main objective should be to recover these populations and expand the distribution rather than only to maintain the population and

distribution of Smooth Goosefoot.

Defining the area of critical habitat as only areas with confirmed current occupancy 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 Smooth Goosefoot populations into these areas in the future.

Implementation of the Strategy

The Proposed Strategy provides a ‘strategic direction for recovery’, but no real plan for how to achieve this. Although all three key strategy sections, focused on inventory and monitoring, research, and habitat conservation and stewardship, are listed as high or medium-high priority, there is no clear plan as to how these things will be implemented or how the goals will be met. There was no schedule provided for the strategic direction for recovery, other than measuring the progress every five years. There needs to be more specific goals and measures of progress in order to better facilitate the recovery of this species.

There should also be a more concrete plan of actions that can and will be taken in each of the three sections of the ‘broad strategy for recovery’. The survey and monitoring and research components are positive but a concrete implementation plan is needed. Landowner engagement and education is also constructive but needs a solid plan for how this will be achieved. Overall education and awareness should be a bigger part of the strategy. This can include awareness around Smooth Goosefoot, other threatened or rare sand dune species, and the important and rare sand dune ecosystems in general.

The proposed actions and measurement of progress do not adequately address the urgency of species recovery. The Strategy indicates that the action plan is to be completed by 2019. As threats continue to affect the Smooth Goosefoot actions should be immediately identified and implemented.

Protection of Habitat

Protection of habitat is perhaps the most important part of species recovery. However, there are no strong regulations or commitments to prevent harmful activities from occurring in critical habitat areas for Smooth Goosefoot. Although further research is needed on extent and ecology of the species, there is sufficient information on threats to the species that conservation and protection of habitat can begin. Habitat protection, beneficial management practices and mitigation of threats to the species should be implemented. Protection must be provided against the activities most harmful to Smooth Goosefoot including those that lead to habitat loss and degradation, or plant mortality. The strategy needs to include targets for increased legislative protection at the provincial and federal level of Smooth Goosefoot habitat.

There also needs to be a commitment in the recovery plan to restrict industry, as well as sale of public lands in current critical habitat or potential expansion habitat areas. The implications of the transfer of the Onefour community pasture from federal government to provincial must be considered. The Saskatchewan provincial government plans to lease or sell community pasture land. This will mean dealing with more land managers and an uncertain future for the

conservation of these areas.

The plan should commit to working with stakeholders, conservation organizations and local landowners and leaseholders on designating new protected areas in grasslands and sand dune habitat that will protect the Smooth Goosefoot and other grassland ecoregion species.

CPAWS SAB appreciates the opportunity to provide comments on the proposed Recovery Strategy for the Smooth Goosefoot. We look forward to a response and strengthening of this Recovery Strategy.

Sincerely,

A handwritten signature in cursive script, appearing to read "Katie Morrison".

Katie Morrison
Conservation Director
CPAWS Southern Alberta Chapter