



September 1st, 2010

The Honourable Jim Prentice
Minister of the Environment
House of Commons
Ottawa, Ontario
K1A 0A6

Dear Minister Prentice,

Re: Critical Habitat for Burrowing Owl in CFB Suffield National Wildlife Area

We have had the opportunity to review the *Recovery Strategy for the Burrowing Owl (Athene cunicularia) in Canada, 2010 [Revised proposed version]* prepared by your Department and made available for public consultation this summer. On behalf of the Suffield Coalition, I write to express our concern about your Department's failure to identify critical habitat for Burrowing Owl within CFB Suffield National Wildlife Area.

The Suffield Coalition comprises seven organizations: Alberta Wilderness Association, Federation of Alberta Naturalists, World Wildlife Fund Canada, Nature Saskatchewan, Southern Alberta Group for the Environment, Grasslands Naturalists, and Nature Canada.

Burrowing Owl is listed as 'Endangered' in Schedule 1 of the *Species at Risk Act*. This species was first assessed as 'Threatened' in April 1979 and designated as 'Endangered' in April 1995. Its endangered status was re-examined and confirmed by COSEWIC in May 2000 and in April 2006. A recovery strategy and action plan to guide efforts for the survival and recovery of this grassland owl are long overdue.

In the summer of 2007, your department published a proposed recovery strategy which did not identify critical habitat for Burrowing Owl. In September 2007, Nature Canada provided comments to your department on this proposed recovery strategy, noting sufficient information existed to identify critical habitat as prescribed by the *Species at Risk Act*. The comments also stressed the urgency of identifying critical habitat within CFB Suffield National Wildlife Area, given the threat to such habitat from a gas development project proposed by EnCana (now Cenovus).

Almost three years after those comments were submitted, a revised proposed recovery strategy has again failed to identify critical habitat for Burrowing Owl to the extent possible, based on the best available information in accordance with sections 38 and 41(1)(c) of the *Species at Risk Act*. The failure of this revised recovery strategy to identify critical habitat for Burrowing Owl within CFB Suffield National Wildlife Area is baffling to the Suffield Coalition.

As Nature Canada argues in comments submitted on this revised proposed recovery strategy, there is no scientific basis for the conspicuous exclusions of habitat biologically critical for Burrowing Owls from the current critical habitat designation for Burrowing Owl. Further, while the recovery strategy identifies critical habitat in land currently under federal jurisdiction or already planned to be added to a National Park, the valuable habitat within CFB Suffield NWA is overlooked and the occurrence of the species within the Suffield block is misrepresented.

Figure 5 in Section 1.4.1, (p.7 and p.10) of the proposed Recovery Strategy appears to indicate that Burrowing Owl does not occur in the Canadian Forces Base (CFB) Suffield National Wildlife Area (NWA) in SE Alberta. CFB Suffield NWA supports an influx of Burrowing Owls from the surrounding region during June through-early September (Banasch and Barry 1998). Environment Canada's February 2008 submission for the Joint Review Panel hearing with respect to EnCana's Shallow Gas Infill Development Project stated: "EC has recorded 5-8 pairs of Burrowing Owls at known nest sites across CFB Suffield annually over the last five years. Within the CFB Suffield NWA, EC has recorded observations of 1-2 pairs of Burrowing Owls at known nest sites in the last three years. These numbers are not the product of comprehensive, systematic surveys however, and undoubtedly more owls would be found if such efforts were undertaken. The likelihood of parts of CFB Suffield NWA being identified as critical habitat for burrowing owls in future is uncertain but possible." (p. 107)

It appears that the exclusion of this biologically critical habitat from the identification of critical habitat for Burrowing Owl is not based on scientific considerations as required by SARA. Information is clearly available to identify critical habitat within CFB Suffield National Wildlife Area and such habitat should be identified in the recovery strategy.

Nearly nineteen months ago, the Joint Review Panel established by your office and the Alberta Energy Utilities Board to consider a proposal by EnCana Corporation to drill 1,275 shallow gas wells in the CFB Suffield National Wildlife Area made its recommendations on the project. We still await the government's decision, which we hope will close the door on further industrial development in CFB Suffield National Wildlife Area. In the meantime and consistent with the letter and spirit of the *Species at Risk Act*, we look forward to the timely publication of a final recovery strategy for Burrowing Owl that identifies critical habitat for this species to the extent possible based on the best available information, including such habitat within CFB Suffield National Wildlife Area.

Sincerely,



Cliff Wallis
Vice-President
Alberta Wilderness Association

On behalf of:	Alberta Wilderness Association	Southern Alberta Group for the
	Nature Alberta (formerly Federation of Alberta	Environment
	Naturalists)	Grasslands Naturalists
	World Wildlife Fund Canada	Nature Canada
	Nature Saskatchewan	

CC: The Honourable Peter Gordon MacKay, Minister of National Defence
Cynthia Wright, ADM, Environment Canada, Environmental Stewardship Branch
Virginia Potter, Director General, Environment Canada, Canadian Wildlife Service