



NC/11-0014-650

July 8, 2011

Manager  
Recovery Management Section  
Canadian Wildlife Service  
Environment Canada  
Via e-mail and SARA Registry

**Subject: Action Plan for the Piping Plover (*Charadrius melodus circumcinctus*) in Ontario**

Nature Canada appreciates the opportunity to comment on the proposed *Species at Risk Act* (SARA) Action Plan for Piping Plover *circumcinctus* in Ontario (the proposed AP). The proposed AP is generally good, but it could be strengthened to better respond to the apparent expansion of this species, particularly of the Canadian Great Lakes Population.

We understand the need to revise the long-term recovery goal for the Canadian Great Lakes Population. We are concerned, however, that the revised long term goal is overly modest, and not consistent with the cautiously more ambitious short term population and distribution objective. Accordingly we recommend that the long term recovery goal be revised to: “the revised goal for the Canadian Great Lakes Population is to ensure the persistence of the current breeding population, and where feasible to increase the current distribution in Ontario”.

While we agree that not enough is known about the growing Canadian Great Lakes Population, there should be a timeframe (of 3 years) for the population and distribution objective “to maintain a minimum of 4 breeding pairs while maintaining and, where feasible, increasing the current distribution in Ontario”, and this objective should be updated at the end of that period to reflect new breeding information, in particular with respect to the sites where nesting has been documented recently (Oliphant Beach and Manitoulin Island).

We welcome the identification of critical habitat in the three sites included in the proposed AP and support the definition of a site and the Site Occupancy criterion. The approach proposed with respect to potential critical habitat at other sites is too weak. There should be a concerted effort to census Manitoulin Island and to monitor Sable Islands Provincial Nature Reserve, Oliphant Beach and other potential critical habitat sites based on breeding evidence. The current proposed approach of surveying areas “over time (e.g. during the international breeding census)” (at p. 9) is insufficient. A yearly survey should be conducted of sites where there has been breeding evidence.

The following statements should be amended in the final version of the AP to include a commitment by Environment Canada to allocate resources to ensure this plan is adequately implemented:

“Environment Canada will endeavour to support implementation of this plan, subject to availability of resources and varying species at risk conservation priorities.” (Proposed AP at p. 11)

“Identification of government agencies and non-governmental organizations is intended to be advice and does not commit the agency or organization to implementing the listed action, which will be contingent upon each Action Plan for the Piping Plover in Ontario organization’s or agency’s priorities and budgetary constraints.” (Proposed AP at p. 12)

With respect to *Table 2 - Measures to be taken and Implementation Schedule*, our comments are:

1. We suggest adding a research activity as follows: 2.3 Support masters-level research into non-breeding threats to PIPL, particularly related to the Deep Water Horizon oil spill in the Gulf of Mexico, including but not limited to toxicological analysis of egg shells (spent) and feathers; and related to determination of wintering range.
2. Organizations within the Canadian Nature Network can contribute to the implementation of action 3.2.
3. The Canadian IBA Program (run by Nature Canada and Bird Studies Canada) can contribute to the implementation of action 4.4, as well as facilitate links with the IBA Program in the United States (Audubon).

Regarding Section 3 on Socio-Economic Evaluation, we have the following comments:

1. We believe that the suggested promotion of wildlife viewing at a remote site like Windy’s Point is inappropriate and would cause more pressure on the species (3.2.1). This section should also note that water management should not be at the expense of an endangered species or the biodiversity values described in the opening paragraph of section 3.2.
2. Reconnecting people and children with nature should be added as benefit of action for the Canadian Great Lakes Population, in section 3.2.2, second paragraph. Also in that section, measures to prevent wildlife viewing from becoming a threat should be considered and implemented.

In summary, Nature Canada looks forward to the prompt publication of a final Action Plan the Piping Plover in Ontario that reflects the comments herein, noting that final

action plans for this species in Alberta and Saskatchewan are overdue despite the publication of proposed versions in 2009.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Kerry", is centered within a light gray rectangular box.

Mara Kerry  
Director of Conservation