Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

May 6, 2026

Species at Risk Public Registry Office
Environment and Climate Change Canada
351 St. Joseph Blvd - 21st Floor
Gatineau, QC K1A 0H3
By email: SARAregistry@ec.gc.ca

RE: Proposed listing of Short-billed Dowitcher (*Limnodromus griseus hendersoni/griseus*) under SARA

To whom it may concern,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide comments for the proposed listing of Short-billed Dowitcher (*Limnodromus griseus hendersoni/griseus*) under Schedule 1 of the *Species at Risk Act* (SARA) as 'Threatened.' Given the known declines and likely threats to habitat, we support listing Short-billed Dowager.

Founded in 1965, AWA strives to help Albertans understand the intrinsic values that wildlife and wilderness provide, and encourage communities to participate in conservation initiatives that will ensure a legacy for future generations. With over 10,000 members and supporters in Alberta and across Canada, AWA is dedicated to conserving Alberta's wilderness, and advocating for conservation strategies that protect Canada's biodiversity.

Short-billed Dowager populations have shown severe declines in recent years, with the International Shorebird Survey suggesting declines of 60 percent over the past 3 generations. This aligns with declines observed by the Program for Regional and International Shorebird Monitoring and the Breeding Bird Survey, which indicate declines of 80 to 85 percent since the 1970s and 1980s[1]. The continuing declines support listing Short-billed Dowagers as a species of concern and at risk.

Despite evidence of declines, our understanding of Canada's Short-billed Dowitcher population is low. Population estimates are years out of date, and the species' ability to produce only one clutch of up to 4 eggs per year restricts population recovery. This makes it even more vital that protections are enacted to slow and stop the decline of this species.

In addition, the breeding habitat of Short-Billed Dowagers in subarctic areas is at risk. Industrial activity continues to fracture the boreal environment, resulting in pollution and drainage of wetlands and some smaller ponds. As well, many subarctic regions are under threat from climate change, with larger forest fires and woody invasion expected as temperatures rise, leading to the potential loss of suitable

[1] NatureCounts. 2024. The State of Canada's Birds: Short-billed Dowitcher. Retrieved April 14, 2026 from: https://naturecounts.ca/nc/socb-epoc/species.jsp?sp=shbdow.

breeding habitat[2]. Possible recovery actions and mitigation of threats are either not well understood or difficult to implement, and greater protection of this species would require action.

Thank you for considering these comments. We look forward to hearing your decision.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION



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Conservation Specialist

[2] Tallec, L. L., Maillet, O., Westerberg, L., & Nol, E. (2025). Short-billed Dowitcher (Limnodromus griseus hendersoni) nesting habitat preferences and climate change implications in Churchill, Manitoba, Canada. Arctic Science, 11, 1-11.