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

November 4, 2026

Grant Hunter
Minister of Environment and Protected Areas
Members of Executive Council, Executive Branch
204 Legislature Building, 10800 - 97 Avenue
Edmonton, AB T5K 2B6
By email: epa.minister@gov.ab.ca

RE: Industrial Development in Endangered Greater Sage-grouse Habitat

To Minister Grant Hunter:

Alberta Wilderness Association is writing to express our concerns about the removal of roughly 74 percent of habitat protections for the Endangered Greater Sage-grouse in southeastern Alberta. 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.

Sage-grouse are an iconic prairie species, and with fewer than 60 birds estimated to remain in Alberta, this species is at high risk of extirpation. Biologists largely agree that intact habitat is the most important factor in sage-grouse recovery. The loss of protections for this highly endangered species is unacceptable and invalidates years of work trying to recover Alberta's sage-grouse population. Thus, we urge the immediate reinstatement of sage-grouse habitat protections, with noise-level limitations and the conservation of critical habitat, alongside restrictions on large industrial development.

Sage-grouse were first listed as Endangered under Alberta's *Wildlife Act* in the year 2000. Yet, despite a quarter-century of recovery efforts — including millions spent on

translocations[1] and captive breeding programs[2]— the population has continued to decline. In 2020, Alberta released a map of Core Areas and Recovery Zones, acknowledging the importance of habitat for sage-grouse and stating, "Their distinct habitat requirements and patterns of habitat use make Sage-grouse particularly vulnerable to habitat loss, fragmentation, and disturbance.[3]" Land use standards were developed "to prevent species extirpation by stipulating the restriction of habitat loss and degradation, noise limits, height limits on structures, and timing."

These land use standards are as necessary today as they were in 2020. Sage-grouse populations have shown few signs of recovery, and habitat loss remains the greatest threat to this species. Protecting the remaining sagebrush habitat, along with restoration and habitat improvement projects, provides the best chance of recovering sage-grouse to sustainable levels in Alberta. Without these restrictions and land use standards, we can expect to rapidly lose the species from Alberta.

Sage-grouse population numbers in Alberta remain despairingly low. The 2023 *Species at Risk Survey Report* for sage-grouse[4] reported a province-wide estimate of only 54 individuals, **a decline of over 98 percent** from population estimates of between 3000 and 6000 in 1968. Not since 2001 has the annual spring count reported more than 100 sage-grouse males in Alberta, and recent counts (2023 to 2025) have remained at 20 males or lower. Across the entire province, only three leks were considered active in 2023, and only two were reported active in 2024. Any further stressors on the populations are likely to lead to extirpation of this species from Alberta.

Habitat loss is the greatest threat to Alberta's sage-grouse. These birds are sagebrush obligates, relying on this plant for food, particularly in the winter months when sagebrush makes up the entirety of the birds' diet[5]. The removal of nearly three-quarters of sage-grouse habitat protections greatly threatens the remaining sagebrush habitat. As native

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[1] Government of Alberta. 2025. Species at Risk Report: Conservation Translocations of Greater Sage-grouse from Montana to Alberta. Available at: https://open.alberta.ca/publications/alberta-species-at-risk-report-175

[2] Wilder Institute. [n.d.] The Greater Sage-Grouse Program. Retrieved November 3, 2026, from: https://wilderinstitute.org/program/the-greater-sage-grouse-program/

[3] Government of Alberta. 2020. Science support document: Greater sage-grouse (Centrocercus urophasianus urophasianus). Available at: https://open.alberta.ca/publications/science-support-document-greater-sage-grouse

[4] Government of Alberta. 2024. Species at Risk Survey Report: Greater sage-grouse lek census 2023. Available at: https://open.alberta.ca/publications/sar-greater-sage-grouse-lek-census

[5] Wann, G. T., Whipple, A. L., Orning, E. K., McLachlan, M. M., Beck, J. L., Coates, P. S., ... & Aldridge, C. L. (2025). Greater sage-grouse seasonal habitat associations: A review and considerations for interpretation and management applications. The Journal of Wildlife Management, 89(5), e70022.

prairie ecosystems — and with the prairie, vital sagebrush plants — are lost, the viable range of sage-grouse shrinks ever further. Protection of this habitat is essential to maintaining and recovering Alberta's sage-grouse population.

Sage-grouse are also highly sensitive to human disturbance. In the past, oil and gas drilling not only fractured and degraded sage-grouse habitat, but noise produced by these rigs also disrupted leks, reducing mating and reproductive success[6]. Periods of extensive petroleum activity were followed by massive sage-grouse population declines[7]. Helium extraction, the most recent threat to sage-grouse, uses largely identical processes to oil and gas, and is expected to have the same impacts. Increasing human activity in critical sage-grouse habitat, especially near leks, would have devastating consequences for the remaining population.

Previously, the importance of sage-grouse habitat was acknowledged by Alberta through designated "Core Areas" and "Recovery Zones," with protections detailed in the *Master Schedule of Standards and Conditions*[8]. These areas have since been removed from Alberta's *Wildlife Sensitivity Maps*[9], with the corresponding protections also removed. Federal Emergency Order protections remain, enacted in 2013 in response to the imminent threat of sage-grouse extirpation, although given the continued decline of sage-grouse populations, these have clearly proven insufficient to protect the remaining sage-grouse, much less recover the population. Unless federal protections are expanded, provincial habitat protections are necessary to prevent the loss of this species from Alberta.

To protect and recover sage-grouse, Alberta must restore the habitat protections in the designated "Core Areas" and "Recovery Zones" and enact strict restrictions to prevent disturbance or degradation. These restrictions must prevent the creation of roads, power lines, and infrastructure that would disturb the soil and be detrimental to sage-grouse, and they must limit noise that would be disruptive to mating activities. Resources must also be designated towards habitat enhancement (including removing artificial structures, fences and power lines) and restoration (such as reclamation of abandoned oil and gas wells). Otherwise, industrial activity will be responsible for the loss of sage-grouse from Alberta.

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[6] Green, A. W., Aldridge, C. L., & O'donnell, M. S. (2017). Investigating impacts of oil and gas development on greater sage-grouse. The Journal of Wildlife Management, 81(1), 46-57.
[7] Walker, B. L., Naugle, D. E., & Doherty, K. E. (2007). Greater sage-grouse population response to energy development and habitat loss. The Journal of Wildlife Management, 71(8), 2644-2654.
[8] Government of Alberta. 2024. Master schedule of standards and conditions. Retrieved November 3, 2026, from: https://open.alberta.ca/publications/master-schedule-of-standards-and-conditions
[9] Government of Alberta. [n.d.] Wildlife sensitivity maps. Retrieved November 3, 2026, from: https://www.alberta.ca/wildlife-sensitivity-maps

Thank you for considering our comments. We would be happy to meet with you to discuss our concerns further.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

Ruiping Luo, Conservation Specialist

Cc:
Julie Dabrusin, Minister of the Environment, Climate Change and Nature (ministre-minister@ec.gc.ca)
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