ALBERTA
Native Plant
COUNCIL

Alberta Native Plant Council

P.O. Box 52099, Garneau Postal Outlet, Edmonton, Alberta T6G 2T5

March 10, 2026

Municipal District of Taber
4900B - 50 Street
Taber, Alberta, T1G 1T2

Re: Rare plant species in proposed grassland conversion area

Dear Reeve Miyanaga and Members of Council,

Thank you for the information the MD of Taber has shared publicly about the proposed expansion of irrigated cropland on approximately 3,100 acres of municipally owned land near Scope Reservoir (Municipal District of Taber).

We are writing to provide additional ecological context for Council's consideration, specifically regarding **species at risk plants and the likelihood for other provincially rare plants** associated with the proposed conversion area and the surrounding area. Intact native prairie ecosystems are among the most threatened ecosystems in the province, with only a small fraction remaining in an undisturbed state. They support disproportionately high biodiversity, store large amounts of long-term soil carbon, reduce erosion, improve infiltration, buffer drought and flood extremes, and sustain resilient grazing systems. Once converted to irrigated cropland, the soil structure, hydrology, and native plant communities that define these ecosystems cannot be restored.

Documented Species at Risk in and near the project area

According to the Alberta Conservation Information Management System (ACIMS), **dwarf woolly-heads (*Psilocarphus brevissimus* var. *brevissimus*), a species listed as "Special Concern" under the *Species at Risk Act* (SARA)**, **is documented within the proposed conversion area**. The documented presence of a federally listed species at risk within the area warrants careful review before land-use change proceeds.

In addition, within a 1 km buffer of the proposed conversion area, there are documented records of:

- **small-flowered sand verbena (*Tripterocalyx micranthus*),** listed as threatened under the provincial *Wildlife Act* and endangered under SARA.
- **tiny cryptantha (*Cryptantha minima*)**, listed as endangered under the provincial *Wildlife Act* and threatened under SARA.

The presence of similar habitat types within the proposed conversion area makes it highly likely that these provincially and federally regulated species would be found within the proposed conversion area, if surveyed. Conversion to irrigated agriculture would likely eliminate or significantly reduce these regulated species where they occur.

Protecting intact grasslands reflects foresight and responsible governance, balancing immediate economic opportunities (e.g., grazing) with long-term public benefit (e.g., aforementioned ecosystem goods and services). These species are often missed if surveys are not conducted at the right time of year by qualified botanists. Their loss would represent an irreversible impact to Alberta's natural heritage and to the ecological integrity of the Municipal District.

Potential for Additional Rare Plants within the Proposed Conversion Area

Beyond the three species at risk plants noted above, the proposed conversion area is within the Dry Mixedgrass Natural Subregion, which is known to support an unusually rich suite of **rare plant species that are tracked by the Alberta Conservation Information Management System (Appendix A)**. These plants are associated with intact prairie and specialized soil/moisture conditions (e.g., alkali flats, sandy blowouts, ephemeral wet areas, and shallow wetland margins), all found within the proposed conversion area. Without thorough rare plant surveys, the number and diversity of rare plants in the area may be underestimated, and conversion could permanently alter or eliminate populations before they are documented.

Requests for Council's consideration

Given the already documented federally listed species at risk plants on or near the proposed conversion area, and the known rare-plant richness, we respectfully request that the MD of Taber consider the following before finalizing any land-use decisions:

1. Defer any final land-use decision until comprehensive rare plant surveys are conducted during appropriate seasonal windows by qualified native prairie botanists.
2. Ensure that any identified rare plant occurrences are meaningfully considered in planning and approval processes.
3. Explore avoidance, conservation easements, or alternative land-use options that retain intact native prairie where feasible.
4. Consult with provincial conservation data sources or local botanical experts to better understand the site's ecological value.

These steps would support informed decision-making and demonstrate due diligence where species at risk are documented on public land. Protecting remaining native prairie aligns with long-term stewardship goals, supports biodiversity, and reflects the MD's commitment to responsible land management. Proactively identifying and conserving high-value ecological sites can also help reduce future regulatory, reputational, and environmental risks.

Thank you for your consideration.

Sincerely,

Kelly Ostermann, Southern Director

On behalf of the ANPC Board of Directors

Cc: Grant Hunter, MLA (Taber-Warner) and Minister of Environment and Protected Areas
Darcy Henderson, Head, Habitat Stewardship, Environment and Climate Change Canada

Appendix A. Provincially Tracked Plant Species Associated with the Dry Mixedgrass Natural Subregion

This appendix summarizes provincially tracked S1 and S2 rare plant species known to occur within, or be strongly associated with, the ecological setting of the proposed conversion area. The information is provided to support informed land-use decision-making and to highlight the ecological sensitivity and conservation value of intact native grasslands.

The primary concern remains the documented federally and provincially listed species at risk plants within and adjacent to the proposed conversion area; the following list is provided as broader ecological context.

Conservation status follows Alberta provincial S-ranks (NatureServe methodology):

- **S1 – Critically Imperiled**: Extremely rare or highly vulnerable to extirpation in Alberta.
- **S2 – Imperiled**: Rare or vulnerable due to restricted range, few populations, or steep declines.
- **S2S3**: Status uncertain; range between imperiled and vulnerable.

Species ranked **S1–S2** are widely recognized as requiring heightened consideration in land-use planning, particularly on public land and where permanent habitat conversion is proposed.

Documented within the project footprint:

- **Dwarf woolly-heads (*Psilocarphus brevissimus* var. *brevissimus*) — *S2, Special Concern (SARA)*.**
  A small annual associated with open, seasonally moist or saline microsites. Highly sensitive to soil disturbance, grading, and hydrologic alteration.

Documented within a 1 km buffer:

- **Small-flowered sand verbena (*Tripterocalyx micranthus*) — *S2, Threatened (Wildlife Act), Endangered (SARA)***
- **Tiny cryptantha (*Cryptantha minima*) — *S2, Endangered (Wildlife Act), Threatened (SARA)***

Documented within the Dry Mixedgrass Natural Subregion:

S1 — Critically Imperiled in Alberta

Scientific Name	Common Name
Asclepias viridiflora	Green milkweed
Atriplex truncata	Wedgescale saltbush

Bacopa rotundifolia	Round-leaved water hyssop
Bidens vulgata	Tall beggarticks
Boechera collinsii	Collins' rockcress
Castilleja sessiliflora	Downy paintbrush
Chenopodium incanum var. incanum	Mealy goosefoot
Cuscuta gronovii	Swamp dodder
Echinochloa muricata var. microstachya	Rough barnyard grass
Eutrema salsugineum	Mouse-ear cress
Juncus nevadensis	Nevada rush
Microsteris gracilis	Slender phlox
Myosurus apetalus var. borealis	Northern awned mousetail
Neoholmgrenia andina	Upland evening-primrose
Picradeniopsis oppositifolia	Picradeniopsis
Thelesperma subnudum	Greenthread
Torreyochloa pallida	Pale false mannagrass
Tradescantia occidentalis var. occidentalis	Western spiderwort
Yucca glauca	Soapweed
Zizania palustris var. palustris	Northern wild rice

S2 — Imperiled in Alberta

Scientific Name	**Common Name**
Antennaria corymbosa	Corymbose everlasting
Antennaria dimorpha	Cushion everlasting
Astragalus kentrophyta var. kentrophyta	Prickly milkvetch
Atriplex powellii var. powellii	Powell's saltbush
Bupleurum americanum	Thorough-wax
Chenopodium subglabrum	Smooth goosefoot
Chenopodium watsonii	Watson's goosefoot
Chenopodium fremontii	Fremont's goosefoot
Corispermum americanum var. americanum	American bugseed
Corispermum hookeri var. hookeri	Hooker's bugseed
Crepis atribarba	Slender hawk's-beard
Crucihimalaya virgata	Slender mouse-ear-cress
Cryptantha minima	Tiny cryptantha
Eleocharis engelmannii	Engelmann's spike-rush

Elodea canadensis	Canada waterweed
Leptosiphon septentrionalis	Northern linanthus
Mertensia lanceolata	Lance-leaved lungwort
Mirabilis linearis	Narrowleaf umbrellawort
Myosurus apetalus	Bristly mousetail
Nothocalais cuspidata	Prairie false dandelion
Nuttallanthus texanus	Canada toad-flax
Potentilla plattensis	Low cinquefoil
Psilocarphus brevissimus var. brevissimus	Dwarf woolly-heads
Rorippa sinuata	Spreading yellow cress
Schedonnardus paniculatus	Tumble grass
Sporobolus neglectus	Annual dropseed
Tomostima reptans	Creeping draba
Tripterocalyx micranthus	Small-flowered sand verbena

S2S3 — Status Uncertain

Scientific Name	**Common Name**
Amaranthus californicus	Californian amaranth
Cryptantha celosioides	Cock’s-comb cryptantha
Elymus elymoides ssp. elymoides	Squirreltail
Lysimachia minima	Chaffweed