



Dear Mr. Merkel and Mr. Gorley,

Old growth forest ecosystems are at the very core of the identity of British Columbia. Furthermore, each region of the province has its own unique forest identifier. If this natural heritage identity is to be maintained for future generations, large tracts of these forest types must be protected. Each type supports a richly different biological diversity, provides revenue for businesses including ecotourism, and provides exceptional ecological goods and service, from carbon storage to climate resilience, and flood prevention to water supplies.

Birds Canada is a national charitable organization dedicated to the conservation of birds in Canada. For tens of thousands of Canadians, we are the voice for birds. Our local office in Delta, British Columbia runs a number of science, conservation, and public engagement programs: for example, Citizen Science monitoring of owls and coastal birds, island invasive mammal work, and Fraser River Estuary conservation. We are adding our voice to the many people and businesses expressing interest in old growth forest protection.

Diversity in Old Growth Forests

A recent paper by the Cornell Lab of Ornithology (2019) showed declines of 29% for western forest birds over the last 50 years. Maintaining a diversity of forest types and age structures is important for maintaining bird diversity (Brockerhoff et al. 2017), and the same holds true for other taxa. Protecting large intact tracts of old growth forest ecosystems in BC is important for maintaining this diversity of forest structures. This goes beyond protecting small groves or individual trees, but requires protecting large tracts of intact old growth forest habitat. Existing managed or harvested land provides other features that benefit birds and other species, but a large proportion of land has already been harvested. It is important now that existing old growth forest be preserved.

Bird Species Reliant on Old Growth Forests

British Columbia supports more breeding bird species than any other North American state or province except Texas (Cannings and Davidson). A major reason for this is our wide diversity of forest types. In all areas of the province, bird species reliant on old growth forests are at risk.

Northern Goshawk *laingi* subspecies – (SARA Threatened, Red List in BC) The coastal subspecies of Northern Goshawk (*laingi*) relies on old growth and mature forests throughout BC's coast to support their large stick nests for breeding and the closed canopy and partially open understory for foraging.

Marbled Murrelet – (SARA Threatened, Blue List in BC) Marbled Murrelets are small seabirds that rely on large, moss-covered branches in old growth forests near the coast (up to 60 km inland) for their nest sites.

Northern Spotted Owl – (SARA Endangered) Only a handful of pairs of Spotted Owls are still breeding in the wild in Canada. The northern subspecies of Spotted Owl that lives in BC prefers old-growth forests subject to natural disturbances.

Williamson's Sapsucker – (SARA Endangered) Williamson's Sapsucker are dependent on mature and old-growth moist coniferous forests (especially containing larches) of interior southern and south-eastern BC.

Lewis's Woodpecker – (SARA Threatened) Lewis's Woodpecker prefers naturally disturbed (including fire) mature and old-growth Ponderosa Pine forests, BC's driest forest type.



Canada Warbler – (SARA Threatened) Canada Warbler prefers old-growth, naturally disturbed deciduous (Aspen) forest patches in the northeastern boreal.

There are many other examples, such as a suite of species associated with mature and old-growth coniferous forest in the boreal, including Cape May and Bay-breasted Warblers (Blue and Red Listed in BC respectively).

Ecotourism and Connecting the Public to Nature

BC's old growth forests are a major tourist attraction, and an iconic part of many company, community, government, and sporting logos. Maintaining this image of mature forests in BC is contingent upon there being old growth forest, both in places people can access and in wilder, more remote areas.

The importance of old growth forest for ecotourism is not just for people visiting BC, but also for those of us living here. Birds Canada relies on the connection many people feel to birds and nature to foster interest in the natural world and conservation. The towering canopies, moss covered trunks, cool shade, and humid, oxygen-filled air that one finds in old growth forests also create this feeling of connection to nature.

Increasing Protected Areas in Canada

Provincial and national work to bring our terrestrial protected areas to 17% by 2020 (Canada Target 1 goal) would benefit from designating areas of old growth forest as protected. Increasing the amount of this important habitat that has legal protection would help governments reach their goals, while preserving an iconic natural feature of British Columbia.

Existing Old Growth Management Areas should be accompanied by publically accessible plans outlining how forestry will ensure the ecological resilience of wildlife and plant communities. These management areas should also be protected from all land use activities, and should be acknowledged in the *Oil and Gas Activities Act*, *Mineral Tenures Act*, and *Mines Act*, along with the *Forest and Range Practices Act* (FRPA).

The Sierra Club submission concerning revisions to the FRPA in 2019 asked that the government remove the constraint “without unduly reducing the supply of timber from British Columbia's forests” from all FRPA legal objectives and from the Government Actions Regulation, suggesting they instead add the constraint “without unduly reducing the resilience of ecosystems” to timber and other ‘use’ objectives (Sierra Club). Birds Canada supports the position of the Sierra Club on this point.

British Columbia has an opportunity here to show global leadership in the face of accelerating rates of forest loss in many parts of the world. Birds Canada urges the province to ramp up its efforts to effectively conserve and celebrate our rich tapestry of forests. Our society and economy relies upon resilient forest ecosystems – so maintaining those ecosystems should be priority number one.

Sincerely,

Birds Canada

4841 Delta St, #206

Delta, BC V4K 2T9

bcvolunteer@birdscanada.org



References:

Brockerhoff et al. 2017. Forest biodiversity, ecosystem functioning and the provision of ecosystem services. *Biodiversity and Conservation*. <https://link.springer.com/article/10.1007/s10531-017-1453-2>

Canada Target 1 Goals. The Pathway. <https://www.conservation2020canada.ca/the-pathway>

Cannings, R. and P. Davidson. Introduction. Atlas of the Breeding Birds of British Columbia. <https://www.birdatlas.bc.ca/introduction/>

Cornell Lab of Ornithology. 2019. Vanishing: More Than 1 in 4 Birds Had Disappeared in the Last 50 Years. <https://www.allaboutbirds.org/news/vanishing-1-in-4-birds-gone/>

COSEWIC. Assessment and Update Status Report on the Spotted Owl. 2008. SARA Registry. https://www.sararegistry.gc.ca/virtual_sara/files/cosewic/sr_spotted_Owl_0808_e.pdf

Northern Goshawk laingi subspecies recovery strategy 2018. <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/recovery-strategies/northern-goshawk-final-2018.html>

SARA (Species At Risk Act). 2019. Species Search. <https://species-registry.canada.ca/index-en.html#/species>

Sierra Club. ENGO Submission to revisions on the Forest and Range Practices Act. <https://sierraclub.bc.ca/wp-content/uploads/FRPA-Joint-ENGO-Submission.pdf>