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Sierra Club BC Foundation

Northern Goshawk & Marbled Murrelet BC Recovery Strategy Submission

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"The hawk had filled the house with wildness as a bowl of lilies fills a house with scent."

- Helen Macdonald, in *H Is for Hawk*

Ecology & Conservation

Sierra Club BC's mission is to protect, conserve, and educate the public about B.C.'s wilderness, species and ecosystems – within the urgent context of climate change impacts. [Our vision](#) is an ecologically sustainable province, which integrates human and economic activity, while conserving the province's wilderness and biodiversity values.

The Federal Species at Risk Act outlines the majority of known species whose very existence is compromised by human culture, industrial activity and cumulative impacts including climate change.

Sierra Club BC approaches conservation efforts with an extreme level of humility for what we know scientifically and what is yet to be learnt about biodiversity and ecology in the face of a changing climate. With this humility and a common sense risk analysis we often focus conservation efforts on keystone or umbrella species as a means to preserve the ecological integrity of the systems the specific species play a niche role. Marbled Murrelets and Northern Goshawks are two such species - if we can manage landscapes so that predators like bears, or in this case Goshawks of Murrelets, can persist on the landscape then a great deal of other species, relationships and ecosystem services persist.

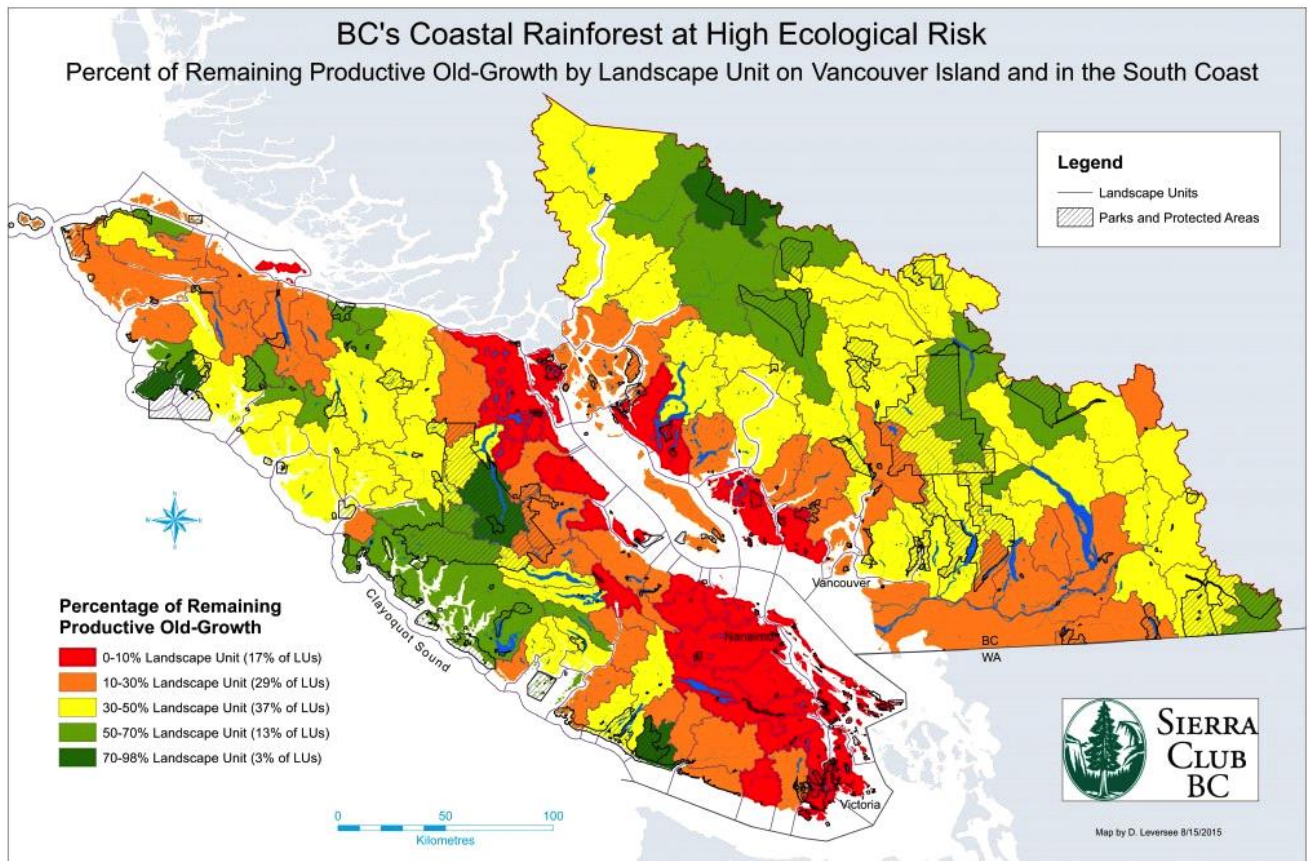
Isolating and managing for a single species within a complex system is an impossible task from an ecological perspective. However, from a practical management perspective it is necessary. Marbled Murrelets or Northern Goshawks therefore are the delegates for old growth ecology at large. What is good for Goshawks is good for Blue-Grey Taidroppers in southern Vancouver Island's Douglas Fir forests. What is good for Murrelets is good for water quality needed for Chinook salmon runs in East Creek & Klaskish in Northern Vancouver Island; and therefore resident orca populations.

With the basic principles of ecology in mind, the Provincial Governments' approach to managing for species at risk must seek to prioritize these species thriving off their landscape not merely surviving with the bare minimum required to persist. If we cannot conduct our timber harvesting and business development opportunities in a manner that is ecologically sustainable, integrates human and economic activity, while conserving the province's [wilderness and biodiversity](#) values then the [limits of BC's splendour](#) collapse; then we lose some of the greatest economic resources in the world: salmon, sustainable forestry sector, and fresh water - Food, shelter and water.

Connectivity & Climate Change

For both species MaMu & NoGo, [Vancouver Island and the South Coast](#) are the heart of the species distribution. Western Hemlock and Western Red Cedar coastal forests core range is best represented by British Columbia's coastal forests and in particular Vancouver Island and South Coast Conservation Regions. We need a highly distributed management approach that addresses every single Landscape Unit on Vancouver Island and the South Coast, despite minimum Province-wide objectives and targets. Any management approach that does not represent the entire known natural distribution of MaMu & NoGo, as well as account for shifting habitat suitability,

prey availability and habitat recruitment in light of shifting habitat and climate impacts, is a management approach that will fracture populations of the species. In order to account for these unknown variables, landscapes must be set aside that anticipate and maintain free mobility of the species within its known distribution in order to maintain genetic diversity and resilience. Therefore, even if BC-wide objectives are met in certain Conservation Regions, there is a larger mandate to prioritize all of the Landscape Units and other Conservation Regions in efforts to maintain species connectivity and allow for shifting habitat demands.



Working Forests

“Good forest management in a time of rapidly changing climate differs little from good forest management under more stable conditions, but there is increased emphasis on protecting climatic refugia and providing connectivity” - Noss, R.F. 2001. Beyond Kyoto: forest management in a time of rapid climate change. *Conservation Biology* 15: 578-590

Despite stereotypes of 'interest groups', 'environmentalist', 'loggers' and the dichotomies that separate our collective interests, Sierra Club BC wants a thriving forestry sector - forever. However, if our Working Forests don't work for the species that live there, then they aren't Working Forests – they are commodities for liquidation to unsustainable international economies, abetted by unconstitutional free-market trade deals. More frequent and hotter wildfires, beetle outbreaks, and bioclimatic changes mean that business as usual in the coastal forestry sector is not possible.

Initiatives like the *Provincial Stewardship Optimization/THLB Stabilization Project* pose interesting opportunities for government - industry creative solutions experiments. However, they also pose a potential threat to the overall land base with WHA or OGMA type designations.

Two potential threats are: 1) the net loss of total spatial protection measures and/or 2) the compromised reserves/designations integrity that have been altered or shifted in order to strategically extract prime timber. While this project is well intentioned, we are concerned that it is vulnerable to problematic practices and is a slippery slope for acceptable range and practices in the forest.

While there is nothing problematic about spatializing and co-locating theoretically speaking - the effects on the landscape could be highly problematic and potentially compromise not only provincial responsibilities within the Identified Wildlife Management Strategy (IWMS) for forest-dependent species (FRPA) and amended Wildlife Act for other species at risk, but more importantly the species habitats themselves. Integrated approaches that numerically meet the

requirements of multiple values in one land parcel does not necessarily translate to actualized species protection measures. For species at risk who depend on fractured and compromised old growth forests, their habitat is a zero sum game with little wiggle room for experimental projects.

[An alternative approach would](#) 1) relinquish policy caps (1%/1.5%) on affects to the Timber Harvesting Land Base, 2) refocus competitiveness projects to retrofitting BC mills for second growth products or other market and labor approaches, 3) offer [conservation financing for First Nations environmentally sustainable resource management](#) to play a larger leadership role in protecting species at risk, 4) launch a program with pilot projects inside the existing THLB for co-locating light-touch logging and new reserves for wildlife or recruitment zones or pilot a co-location program for multiple licensees to harvest on one cut block and 5) implement an Ecosystem-Based-Management approach on Vancouver Island & South Coast.

Memoranda of Understanding with the forest sector ought to be sought directly with licensees that operate in high conservation value areas that are in most immediate risk of habitat loss due to logging. Examples of such areas are: Klaskish FDU, Mahatta FDU, Neroutsis FDU, Holberg FDU, San Joseph FDU, Bonanza FDU, Upper & Lower Nimpkish FDU's, Tsitika FDU, Salmon Inlet Landscape Unit and Walbran Landscape Unit.

Further to MoUs with licensees on Crown land, we encourage outreach to organizations like the Private Forests Landowners Association, and other large landowner stakeholders like municipalities. The almost perfect eclipse of much of southwestern BC's dry forests tracts ranging from Victoria up towards Campbell River encompassing the Gulf Islands and much of the Sunshine Coast, and private land holdings requires specific outreach programs for private landholders.

We call for all non-legal OGMA's to be upgraded to legal, the immediate recommendation to government to the [BC Old Growth Protection Act](#), and subsequently investigate options for introducing such legislation as a means to empower new mechanisms for old-growth protection of species. Success with current provincial tools for implementation of required federal objectives may be inadequate with the provincial cap on TLHB. Creative and new solutions will need to be introduced.

Public Engagement, Access and Transparency

"Most monitoring activities on Vancouver Island are being conducted by forest harvesting companies" - [Species At Risk Public Registry](#), Northern Goshawk laingi subspecies.

While we appreciate the opportunity to participate in the BC MaMu & NoGo Recovery Strategy sessions and process we feel that a greater emphasis on open, advertised and accessible public participation was/is needed for a fair and proper process. This is likely due to budgetary constraints and staffing capacities, so the primary emphasis for this is towards an increased capacity for the department responsible.

In order for the public, researchers and community organizations to be able to engage meaningfully with the management of their crown resources, access to information regarding such Crown assets, resources and government data needs to be made more fully and readily available to the public. The intentional extraction of much needed funding for Ministry of Environment and Ministry of Forests Lands Natural Resources & Operations departments responsible for scientific research, data collection, Compliance & Enforcement and monitoring leave the public without adequate knowledge to make informed decisions about Crown resource management. Professional reliance and the Forest Range and Practices Act have outsourced ecology research and monitoring to industry counterparts. As a consequence, the information used to populate public information is not only conducted and

collected by parties who have a vested interest in how that data is used, but also the information itself is held in an intellectual-property-type limbo whereby data-sharing agreements must be signed by members of the public for information about their own Crown resources. This drift towards partial privatization of public land information and range practices compromises the quality of threatened and endangered species monitoring, management and protection. There is a vital mandate for government to increase accessibility and make public this type of information, so that public processes like the BC MaMu & NoGo Recovery Strategy public engagement portion of the process is an informed one.

The scope of parties that were reached out to for consultation and engagement were good ones, namely First Nations and also the forestry sector. Of course community groups and environmental interest organizations like ours appreciate being invited to participate and make submissions. We felt that this approach of targeted interest groups ought to have been extended to integrate an ecosystems goods & services analysis, non-timber forest products interests such as wild food and medicinal plant harvesters, hunters & anglers, recreational cavers, hikers or kayakers. Furthermore one of the most apparently absent interest groups that ought to be considered is the growing ecotourism industry. There are a [growing number of Chambers of Commerce](#) who see much higher economic yield in old growth rainforest ecosystems, home to Goshawks & Murrelets, from ecotourism ventures than from traditional logging. In many cases, traditional logging is harming not only critical habitat for threatened species, but also the economic viability of small coastal communities that see the end of old growth logging in sight and have transitioned to non-timber harvest old growth dependent economies. Having these interests and perspectives consulted and engaged with for this Recovery Strategy would have provided very interesting, progressive

and unique input that could have had a very positive affect on the protection of Murrelets and Goshawks.

Key points of concern & consideration

- Advocate for increased budget, staff and resources for FLNRO ecosystems biologists and re-search projects.
- Prioritize targeted engagement with all forestry licensees operating in high conservation value areas for immediate MoU's.
- Immediately move all Soft Reserves (non-legal) to Hard Reserves (legal) as part of interim protection initiative.
- Propose numerous WHA's in shoulder areas like potential overlap zones between a. G laingi & a. G atricapillus in light of shifting habitat demands.
- Double the number of WHA's and OGMA's in Northern Vancouver Island.
- Propose access to funds available to licensees for shared data mapping, for non-timber harvesting organizations, NGO's, municipalities and community groups.
- Increase public accessibility to government spatial data and licensee harvest and site plans.
- Find alternatives to avoid undermined efforts with limitations of 1.5% impact on Timber Harvesting Landbase

High Conservation Value locations & Priority Areas:

- Walbran Landscape Unit: unprotected upper Walbran area and Walbran Special Management Zone.
- East Creek Watershed and Klaskish Landscape Unit: Northwest Vancouver Island.
- McLaughlin Ridge, Port Alberni

- Cameron Valley, Port Alberni
- Echo Lake, Agassiz
- Florez Island
- Discovery Islands
- Nimpkish Valley, Northern Vancouver Island
- Nootka Island, West Coast
- Juniper Ridge, Port Alberni
- Koksilah Valley, Cowichan
- Roberts Creek, Dakota Ridge, McNair Valley, Elphinstone Park area, Sunshine Coast
- Homathko River, Bute Inlet
- Gilford Island, Broughton Archipelago
- West Cracroft Island, Johnstone Strait
- Klinaklini River, Knight Inlet
- Smith Inlet, Belize Inlet, Seymour Inlet & Mackenzie Sound.
- Hanson Island, Broughton Archipelago