

qathet Old Growth submitted a letter in November 2020

**Re: PROPOSED LAND USE OBJECTIVES REGULATION (LUOR)  
Relating to the recovery of Marbled Murrelet (*Brachyramphus marmoratus*)**

The Marbled Murrelet (*Brachyramphus marmoratus*) is listed as Threatened, both in Canada under the federal *Species at Risk Act* (Government of Canada 2002) and in the United States under the *Endangered Species Act* (1973) for California, Oregon, and Washington states. Loss of old-growth forest nesting habitats is the main cause for species listings in both countries (COSEWIC 2012).

Although Marbled Murrelets spend their days fishing in the ocean, they rely almost exclusively on old growth forest for nesting, needing large, moss-covered tree limbs on which to lay their solitary eggs. Due to historic and ongoing logging and fragmentation of old growth forests, the Marbled Murrelet is now listed as Threatened, both in Canada and the United States. In southern BC, because so little old growth remains in many forests close to the coast, Murrelets must often fly far inland to find suitable nest sites. This forces them to undertake long, twice daily sojourns of up to 30km or more between their nestlings and their ocean foraging grounds.

Because of its reliance on old growth, the Marbled Murrelet is a flagship (or umbrella) species, which serves as an indicator of the health of coastal old growth forests in BC. When Marbled Murrelets are protected, so too is a suite of unique animals, invertebrates and plants that are likewise old-growth dependent. Many of these species and ecological communities are also at risk of becoming endangered or extinct (including 15 wildlife species found in the qathet region, among them the Spotted Owl, Wolverine, Grizzly Bear, Pacific Giant Salamander, and more). Furthermore, old growth forests in the qathet region area are important because they:

- Provide clean, natural flows of water for people, wild salmon, and other wildlife
- Supply Powell River's rapidly growing outdoor community and tourism industry with high value areas for backcountry recreation (such as hiking, mountaineering, skiing, snowshoeing and world class wilderness climbing).
- Store vast amounts of atmospheric carbon.
- Are central to many First Nations cultures.

The unique features of old-growth temperate rainforests--which may contain trees up to 2000 years old (1800+ year old trees have been found on the lower Sunshine Coast) take centuries to develop. Because these forests are typically re-logged every 50 to 100 years, they are not a renewable resource under B.C.'s present forestry system and are not replicated by tree-planting. According to the Ancient Forest Alliance, almost 80% of the original productive old-growth forests (i.e. forests with large trees) on BC's southern coast have been logged, including well over 90% of the lowland ancient forests where the richest biodiversity and largest trees are found. The logging of these carbon-rich forests contributes significantly to BC's CO<sub>2</sub> emissions and is driving old-growth dependent species towards extinction. In the qathet Regional District, as little as 0.2% old growth remains in forest variants in some forestry Landscape Units. In fact, preliminary analysis indicates that every Landscape Unit in the qathet region (except Toba) has at least one forest variant with less than 10% old growth remaining.

We are pleased to see that the Province of BC is finally taking action to protect this disappearing sea bird and the old growth forest it relies on. In light of the above, **we strongly support/ask that you support the BC Ministry of Forests, Lands, Natural Resource Operations and Rural Development's PROPOSED LAND USE AND WILDLIFE OBJECTIVES relating to the recovery of Marbled Murrelet.** This proposal includes protections for highly valued old growth stands in the Daniels Valley, Eldred Valley, Shirley Valley and more. Within the qathet Regional District as a whole, we specifically support:

1. Spatial, mapped protection of a minimum of 85% of the minimum habitat threshold for Crown land, and other supporting objectives outlined in *the Implementation Plan for the Recovery of Marbled Murrelet in BC* (FLNRO 2018).
2. The issuance of the proposed Land Use Objectives Regulation (LUOR) Order under the provincial *Land Act* to maintain minimum habitat thresholds for provincial Crown land, as required by the Implementation Plan.
3. At a minimum, protection of all Suitable Marbled Murrelet habitat identified in Schedule 5 of the proposed LUOR order.

Wherever possible, there is also a need to maintain contiguous forest cover around proposed Marbled Murrelet Suitable Habitat (especially any adjoining old and mature forests) to allow for future recruitment of old growth forests, and to mitigate negative effects associated with forest fragmentation, such as increased nest predation by ravens and jays, and increased tree mortality through wind throw. In addition, climate change increases pressure on this species, by way of increased frequency of extreme weather events, increased risk of catastrophic wildfire, and large-scale changes in the marine food web. **All actions within the forest moving forward must be to restore habitat for climate resilience and species survival,**

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