

August 15, 2011

Recovery Planning
Environment Canada
Via e-mail and SARA Registry

Re: Comments on the Proposed Recovery Strategy for the White-headed Woodpecker (*Picoides albolarvatus*) in Canada (June 2011)

On behalf of the David Suzuki Foundation and Nature Canada we are pleased to have the opportunity to provide comments on the proposed Recovery Strategy for the White-headed Woodpecker (*Picoides albolarvatus*) in Canada. Our comments outlined below are focused on the identification of critical habitat and the timeline for an action plan. We are concerned that delaying the identification of critical habitat for the White-headed Woodpecker to a 2016 action plan is not precautionary given the threat that habitat loss and degradation pose to the survival and recovery of this species in Canada.

The White-headed Woodpecker is listed as 'Endangered' under the *Species At Risk Act* (SARA). As such, a recovery strategy is an essential component of its recovery. Critical habitat identification is a fundamental step in the recovery of species at risk, for habitat needed by species at risk to recover needs to be identified so that it can be maintained or restored. The Minister of Environment must identify critical habitat (habitat needed for survival or recovery) to the extent possible, based on the best available information (SARA, section 41).

Critical Habitat identification within proposed Recovery Strategy

The proposed recovery strategy states that: "[...] there is not adequate information available on the characteristics of the habitat used in Canada, the distribution of appropriate Ponderosa Pine stands, and the number of White-headed Woodpeckers potentially supported by those stands, to allow for area-based critical habitat identification." (RS, 11)

Habitat Needs of White-headed Woodpeckers

It is widely recognized that White-headed Woodpeckers rely on coniferous forests throughout their range. In the northern portion of their range, both in Canada and the U.S., they are found exclusively in old growth Ponderosa Pine stands. They rely on these trees both for nesting sites and as a food source and the Ponderosa Pine is the only tree used by White-headed Woodpeckers in Canada. The exclusive reliance on Ponderosa Pine stands likely means that the breeding territories are large, a fact acknowledged by the proposed recovery strategy (RS, 5). The proposed recovery strategy also outlines the characteristics of habitat required for breeding, roosting and foraging (RS, 5).

Recent research conducted in Washington, not included in the proposed recovery strategy, suggests that White-headed Woodpeckers may be more tolerant of younger forests than was previously believed (Kozma, 2011). While information is lacking on the

characteristics of the habitat used in Canada, it is clear that Ponderosa Pine stands are necessary to the continued survival of White-headed woodpeckers in the Canadian portion of their range.

Threats Facing Habitat

The proposed recovery strategy outlines the following threats facing White-headed Woodpecker habitat: fire suppression, pine beetles, a legacy of past commercial forestry and climate change (RS, 7-8). It makes no mention of “ongoing threats from habitat loss and degradation” which was mentioned as a key threat in the 2010 COSEWIC assessment. Under section 41 of SARA “[...] the recovery strategy must address the threats to the survival of the species identified by COSEWIC, including any loss of habitat [...]”. The proposed recovery strategy outlines plans for restoring currently degraded habitat but has no outline for dealing with continued habitat loss. The final recovery strategy must address ongoing habitat loss and establish measures to prevent further habitat loss.

Obligation to Use Precautionary Principle

Section 38 of *SARA* mandates the use of the precautionary principle for the identification of critical habitat—that is, lack of scientific certainty must not preclude action. In other words, recovery planners are mandated to use the best science available at the present time to identify the habitat needed by the White-headed Woodpecker to survive or recover.

While there is still research to be done of the specific habitat tolerances and uses by White-headed Woodpeckers in Canada, as well as their population size and distribution, we do know their general habitat requirements, which are even outlined in the proposed recovery strategy (RS, 5). In the absence of critical habitat identification, Ponderosa Pine stands will receive no protection, and could be further degraded or lost.

The proposed recovery strategy asserts that it plans to “complete a draft identification of critical habitat by 2015” (RS, 12). As noted earlier, the recovery strategy should address current habitat loss and propose measures to ensure the remaining viable habitat for White-headed Woodpeckers will not be degraded or lost by 2015 while work is being done to identify critical habitat under the SARA.

Although recent observation records of this species are extremely rare, data does exist on the characteristics of the habitat utilized by White-headed Woodpeckers. A truly precautionary approach would be to ensure that the remaining Ponderosa Pine habitat that meets the requirements of the White-headed Woodpecker be protected while ongoing research into population numbers and distribution is conducted and critical habitat is identified under the SARA.

The current Canadian population of White-headed Woodpeckers is “estimated at about 10 individuals” (RS, 5). Considering that the population and distribution objective of the recovery strategy is to “enable a population of White-headed Woodpeckers to exist within historically-occupied habitat” (RS, ii), and the habitat loss and degradation are a

major threat, the timelines of 2015 for the identification of critical habitat and of 2016 for the completion of an action plan should be more ambitious.

Other comments

With regards to information needs about the current population size and distribution of White-headed Woodpecker in British Columbia, we recommend the proposed recovery strategy include any data on the distribution of White-headed Woodpeckers collected for the British Columbia Breeding Bird Atlas which is currently underway.

In addition, we support the measures proposed in the recovery planning table. With regards to habitat characterizations and management, we recommend that the proposed habitat management measures (as detailed in 6.3 Narrative to support the Recovery Planning Table) be implemented as soon as possible and not be postponed until the characterization is completed and critical habitat is identified. Also, the action plan should clearly indicate who will be responsible for conducting the habitat management and how it will be monitored.

Recommendation

While we acknowledge the need for further efforts to determine this species distribution in Canada, due to the White-headed Woodpecker's dependence on Ponderosa Pine stands, we recommend that the remaining occupied Ponderosa Pine stands be protected while the research is completed and critical habitat is identified. We also recommend that the recovery strategy address the ongoing threat of habitat loss and degradation noted in the COSEWIC report. Finally, we recommend that timelines be adjusted so that the identification of critical habitat and the completion of an action plan occur no later than a year after the final recovery strategy is promptly published following the consideration of this public consultation.

Sincerely,



Rachel Plotkin
Biodiversity Policy Analyst
The David Suzuki Foundation



Mara Kerry
Director of Conservation
Nature Canada