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California Fish & Wildlife Commission
P.O. Box 944209
Sacramento, CA 94244-2090
fgc@fgc.ca.gov

RE: List the Black-backed Woodpecker as “Threatened” under the CESA

Dear Commissioners,

I encourage you to list the Black-backed Woodpecker as a “threatened” species under the California Endangered Species Act (CESA). The Black-backed Woodpecker is a rare and unique bird, and its loss to the ecosystem could be devastating to the Sierra.

The Black-backed Woodpecker is in trouble; and in fact is one of the most imperiled bird species in the state. Suitable habitat for this species has declined dramatically since the early 20th century due to fire suppression, post-fire logging, and large-scale “mechanical thinning” logging operations. This is a management indicator species whose troubled status is a harbinger of more species loss to come. Most woodpecker species cannot excavate a nest cavity in recently fire-killed trees because the wood is too hard, but the Black-backed Woodpecker can. And, the Black-backed Woodpecker creates a new nest cavity every year, leaving the old nest cavities for other woodpecker species, as well as other cavity-nesting species that cannot create their own homes, such as mountain bluebirds, wrens, nuthatches, as well as flying squirrels. In this way, the Black-backed Woodpecker is an ecologically-vital “keystone species,” creating essential habitat for many other wildlife species in the forest. As such, the Black-backed Woodpecker is a bellwether for an entire group of other wildlife species that depend upon post-fire habitat created by higher-intensity wildland fire in conifer forests in California. This habitat, known as “snag forest habitat,” is more than four times as rare as old-growth forest, and supports levels of native biodiversity and species richness similar to, or higher than, old-growth.

The Black-Backed Woodpecker is an important species in assisting the natural rehabilitation of the forest after high-intensity wildfire. A unique bird, the Black-backed Woodpecker is one of only two woodpecker species in North America that has only three toes, instead of four. This adaptation, along with unique body proportions, gives this species the ability to strike the wood of fire-killed trees much harder than other species, allowing the woodpecker to feed upon the larvae of its primary prey: wood-boring beetles, which are deep in the wood of recently killed trees. The Black-backed Woodpecker has also evolved to be camouflaged against the charred bark of recently fire-killed trees—giving it an advantage it does not have in unburned

forest. The higher-intensity fire areas, upon which Black-backed Woodpeckers depend, have always been a natural part of the fire regimes in conifer forests of California, along with low/moderate-intensity fire areas. Currently, most fires are predominantly low/moderate-intensity, so the higher-intensity fire areas needed by Black-backed Woodpeckers are extremely rare and important for their survival.

Thank you for the opportunity to comment on this issue and request that the Black-backed Woodpecker be listed as “threatened” under the CESA. You have the opportunity to help protect a critical species for the Sierra.

Sincerely,

A handwritten signature in black ink that reads "Ara Marderosian". The signature is written in a cursive style and is positioned to the left of a vertical line.

Ara Marderosian,
Executive Director
Sequoia ForestKeeper
ara@sequoiaforestkeeper.org