

On 11/18/2021 1:32 PM, DICK VARNEY wrote:

November 18, 2021

Dear Peter Luckham, Chair Islands Trust Council & Lasqueti Trustee

I had been a farmer on Lasqueti then became a Registered Professional Forester (RPF), including two periods as an extension forester. I am retiring now and believe I have learned a lot and I am still learning. I have seen many times that environmental legislation over time does not produce the original goal of such legislation. Forestry is more complex than most people think and especially forestry on private land. I have done three small harvests and been unwilling to harvest at another time (due to scale & economics at that time) of my land on Lasqueti.

I would like to point out some warnings about the issue with tree cutting & forestry "Development Permit Areas".

I am surprised that no one has complained to the Association of BC Forest Professionals that the Galiano "tree cutting & removal" bylaw and "development permit area 3" was developed to regulate rate of harvest and I believe is overseen by non-RPF's. I believe your planning staff do not have the expertise of a RPF. There also does not seem to be public information on the criteria that will be used to evaluate how such a "Development Permit" application will be reviewed and what is a "sustainable forest management strategy". This is all really about laws and I am not a lawyer, but something to be aware of if it comes up.

At this time your correspondence with higher levels of BC government, appears to show that you are most concerned about tree cutting and regulation of potential harvests on private Managed Forest (MF) land in the Trust area. There are a minimum of three other categories of forested land within the Islands Trust jurisdiction, of which two have fewer environmental regulations or limiting conditions on what landowners can do during & after a harvest than MF landowners. You should also consider that restricting tree cutting may not provide the best protection in the CDF because there has been over 100 years of fire prevention and regeneration that has created over-dense conditions in the CDF.

So, if the Islands Trust was to get jurisdiction to regulate cutting of trees or forests; such regulating personal would need to be done by persons qualified, under the new Professional Governance Act & Forest Professionals Regulation, such as a RPF. *I use RPF because the other types of registrants under the FOREST PROFESSIONALS REGULATION, would probably not be qualified.* This is also true about the 2021 Island Trust Strategic Plan. I would like to point out that you need qualified persons to implement or advise on Section 1. Land Stewardship with strategy 1.2 and 1.4.

RPF or other qualified persons must operate under the ABCFP Code of Ethics and Professional Conduct, have their work peer reviewed, and write only Professional Rationals to support/explain their works; to name a few of the main conditions of being a RPF. So, then the Islands Trust may hire RPF's, but the many factors a RPF must consider within their work may be a bigger stumbling block to using a "Development Permit Area" to restrict harvesting than you believed (my opinion).

I am not saying Islands Trust area forest stewardship cannot be improved, or should not be improved, but is regulation the answer? To preserve and protect the CDF ecosystem is important to most people, but few understand the importance of fire for this ecosystem, especially after a 100 years of fire prevention. The many different sizes of properties also complicates tree cutting and forest regulation

because of the multiple levels of public interest a RPF has to consider (ecosystem, stewardship, economics, & many levels of social/ public interest). What is protection and preservation? What are we protecting; today's forest conditions after 100 years of fire suppression or should we be restoring to "say" 1850 forest conditions? How do we restore 6 to 40 year fire return intervals with our population density? What about reconciliation and respect of indigenous management practices on the land? Is a tree cutting regulation possible within all our other landowner rights? And maybe last, is the tools one chooses going to achieve the goal, considering all the natural variables?

I am soon to be a Retired RPF, but I will try to answer any further questions you might have about what I have written. I can also point you to others whom could answer your questions about reserved rights of Foresters in BC. I also believe there are other better ways to accomplish your goals.

The Acts and regulations I used above, point out that only qualified persons can provide advice and services about reserved practice matters:

- Professional Governance Act
- Forest Professionals Regulation 1. & 4.
- Foresters Act (definitions)

Truly,

Dick Varney, RPF soon (RET) as of Nov 20  
Landowner on Lasqueti [REDACTED]