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Sent: Thursday, February 24, 2022 12:56 PM
To: Islands2050
Subject: Forest Stewardship - NOT SUPPORTED

Forest Stewardship

I do not support the Bylaw 183 plan to take over management of Forest Stewardship and Tree Cutting for the following reasons:

Forest Stewardship

In a letter of response dated October 21/21 to the Islands Trust Policy Statement the Ministry of Agriculture, Fisheries and Food almost completely rejected the Directives in the TPS regarding tree removal and land clearing on agricultural land. Their comments: "Overall, this section appears to strive for a vision of agriculture that does not reflect the current realities of the agricultural sector in B.C. Land clearing (i.e. removing trees) is often a necessary farm practice for farmers to conduct agriculture. Whether farmers land clear an entire property or simply remove a small number of trees, land clearing is often necessary to commence an agricultural operation or to expand an existing one. Further, section 6 of the Agricultural Land Reserve (ALR) Use Regulation, via the definition of "farm operation" in the Farm Practices Protection (Right to Farm) Act, identifies land clearing as a Farm Use that may not be prohibited by a local government if the work is required for Farm Use."

The Islands Trust Policy Statement Bylaw 183 contains questionable information for Gulf Island residents in an attempt to take control of all forest and tree cutting management, despite the fact that it has been denied in the past by the Provincial Government. The Gulf Islands are part of a large Coastal Douglas Fir Zone (CDF) that stretches from BC to

Washington and Oregon. The Islands are unique by location, but not rare. The Trust area does not have a unique bioclimatic zone, but is one small part of a huge coastal CDF zone.

Coastal Douglas Fir, Western Hemlock, most coastal tree species, and related ecosystems are projected to be NET BENEFICIARIES OF CLIMATE CHANGE.

The CDF Zone tree growth is expected to almost triple in size in the next 30 years and more than quadruple by 2085 – hardly a zone in crisis.

This plays an integral part in stabilizing the climate, the carbon cycle, supports livelihoods, and helps drive sustainable growth. Douglas Fir is already, and projected to be, a climate change success!

There is extensive range expansion on the coast and interior throughout North America and no portion of the range is under stress. Douglas Fir is now ranked number seven worldwide among invasive conifers outside the Pinus Genous. The high degree of genetic variability and plasticity of Douglas Fir, due to its huge natural range, are the main reasons for its success.

There is no proof Douglas Fir trees are actually dying or being cut in large numbers, in fact more trees topple than are ever cut. Gulf islands forests are in much less danger than they were 100 years ago, when all the islands were clear cut. Old growth forests are NOT logged, despite the claim to the contrary. Second growth forests are logged at a rate of 25 thousand cubic meters, at best, annually.

Meanwhile, the annual growth is over 350 thousand cubic meters and compounding annually, making the forestry here 100% sustainable. The DCF restrictions the Islands Trust is proposing completely disregard this fact.

The other factor completely ignored by the Islands Trust is the deer overpopulation on all the islands.

They are responsible for the consumption of new tree growth and ground vegetation on a scale that is clearly visible. Overpopulation is a phenomenon that occurs when a species' population becomes

larger than the carrying capacity of its environment. Why is the Islands Trust not mentioning this fact – does it not fit their narrative?

TPS Bylaw 183 Policies and Directives are vague in how their version of Forest Stewardship should work as it applies to life in the Gulf Islands. How are Islanders to be subjected to interpretations of these vague directives?

A few examples:

4.3.9 Trust Council shall coordinate with, and advocate to, the provincial government to grant Islands Trust the necessary jurisdictional authority to preserve and protect forest ecosystems, including legislation to prohibit clear-cutting and logging of old-growth in the Trust Area; and authority to regulate tree cutting in the Trust Area: THIS HAS NOT BEEN APPROVED BY THE PROV GOVERNMENT IN THE PAST.

4.3.10 Trust Council shall coordinate with, and advocate to, the provincial government to adopt legislation establishing sustainable forest harvesting practices that protect environmental integrity on a scale of forest stands and landscapes by preserving, protection, and restoring. VAGUE DIRECTIVE, NOT APPROVED BY THE PROVINCIAL GOVERNMENT IN THE PAST.

4.2.13 designate forest ecosystem reserves where no extraction shall take place in order to promote the preservation of native biodiversity. IS PRIVATE PROPERTY TO BE ENCUMBERED AS A RESERVE? EXISTING DEVELOPMENT PERMIT FOREST AREAS WERE ARBITRARILY DRAWN ON A MAP WITH NO SURVEY AND NO RECOURSE TO QUESTION?

4.3.11 require that applicants identify to maintain sustainable forest land use , prior to approval of tree cutting plans; and 4.2.14 implement property tax incentives for the practice of sustainable forest harvesting. (4.2. NO JURISDICTION OVER PROPERTY TAX. MORE STAFF TO MANAGE TAX INCENTIVES?

To advance protection of the Coastal Douglas-fir zone, official community plans should specifically set goals, objectives, and policies that support CDF retention and protection. Each OCP should also be amended to include strong language directing protection of the CDF zone. PROPERTY OWNERS AT THE MERCY OF ARBITRARY ADMINISTRATIVE DECISIONS. WHAT IS STRONG LANGUAGE – THOU SHALT NOT?

Comments on Islands Trust Literature promoting the “all is lost theory” in contrast to the science that the CDF zone is under no stress as mentioned above: The CDF Zone encompasses the entire Islands Trust Area and is found nowhere else in Canada. THE CDF ZONE IS IN FACT PART OF A LARGE COASTAL ZONE THAT STRETCHES FROM BC TO WASHINGTON AND OREGON. COASTAL DOUGLAS FIR IS COASTAL AND DOES NOT GROW IN THE REST OF CANADA.

The Coastal Douglas-fir (CDF) zone describes a unique set of ecosystems found only on southeast Vancouver Island, the Gulf Islands, and the southwest coast of BC. CDF ecosystems are rare and highly endangered. These ecosystems include Douglas-fir forests, as well as Garry oak woodlands, wetlands, estuaries, and other unique communities of plant, animal, and fungi found nowhere else in the world. THE ISLANDS ARE UNIQUE BY LOCATION, BUT NOT RARE, NOR ENDANGERED. NO DOCUMENTED EVIDENCE PRESENTED THAT DOUGLAS FIR IN THE CDF ZONE ARE IN DANGER.

Since European settlement, almost half of the historically forested land in the CDF zone has been lost due to land uses such as forestry and development. Most old-growth forests have been replaced by second-growth forests that are not as biodiverse or resilient. Remaining CDF forests are in a hotspot of urban and rural development, and under increasing pressure from a growing population. FOREST MANAGEMENT

MUST INCLUDE THINNING AND FIRE BREAKS TO PREVENT UNCONTROLLABLE FOREST FIRES.

TRUST AREA FORESTS ARE IN MUCH BETTER CONDITION THAN THEY WERE 100 YEARS AGO.

PROMOTION OF LEAVING FOREST DEBRIS ON THE GROUND IS AN INVITATION FOR CATASTROPHIC FOREST FIRES. CDF FORESTS ARE ACTUALLY GROWING AND HEALTHIER THAN IN THE PAST.

Climate change will have significant impacts on CDF forests as intensifying summer droughts stress

trees. Islander observations indicate that climate change has already impacted western red cedar and

other species. It is likely that drought is the primary cause of increased stress, but work needs to be

done to understand these changes and adapt conservation of CDF habitats. AS NOTED ABOVE

COASTAL DOUGLAS FIR ARE PROJECTED TO BE NET BENEFICIARIES OF CLIMATE CHANGE.

SOME WESTERN RED CEDAR HAVE BEEN AFFECTED BY RECENT WEATHER.

CDF forests and associated ecosystems are among the most endangered in Canada, yet only 11% of

land in this zone is protected. Eighty percent of the land in the CDF zone is privately owned,

highlighting the importance of voluntary conservation actions by individuals to protect what's left.

FOREST MANAGEMENT MUST INCLUDE THINNING AND FIRE BREAKS TO PREVENT

UNCONTROLLABLE FOREST FIRES. CDF ZONES ARE NOT IN DANGER, ACCORDING TO

SCIENCE.

Where is the human factor? Blocking all ability for land owners to manage trees on their private

property is contrary to the TRUST MANDATE requirement that there be some benefit to the residents.

Hideous costs to hire registered arborists, apply for a permit, obtain approval by the Trust approval

person or hired consultant to confirm a tree can actually be cut is beyond reasonable practice. How

would dangerous trees that need immediate removal be handled in this bureaucratic quagmire? What happens if a tree falls over in a storm? Will the islands Trust assume liability for denying tree removal and damage or physical harm occurs?

The Ministry of Forests Lands and Natural Resources has hundreds of registered Foresters.

The Islands Trust has NO STAFF with expertise in Forest Stewardship, and therefore must hire new staff or engage consultants to monitor its proposed forestry bylaws. Ministry districts cover and manage the Gulf Islands.

The Islands Trust is trying to acquire the powers of a municipality from the Provincial Government in order to enact bylaws they are not now able to implement. One of their key missing policy tools is the ability to enact bylaws to regulate tree management and protect trees on private lands within the Trust area. The province has granted all municipalities in BC the authority to enact such bylaws, but this authority has NOT been granted to the Trust. Their desire to manage trees on private land in reality is not necessary as has been proven by forestry experts noted above referencing David Dunniston's video – Islands Trust and the Coastal Douglas Fir Zone. Video link below.

The other factor completely IGNORED by the Islands Trust TPS is the MASSIVE DEER POPULATION on all the islands. They are responsible for the consumption of new tree growth and native ground vegetation on a large scale.

Provincial Government involvement in Forest Stewardship
The Province is engaging and consulting with Indigenous peoples, local governments, the forest industry, labour and other interest groups. Modernizing forest policy will include a coordinated approach to the many forestry-related changes that are being promoted.

Government continuously refines forest stewardship through ongoing improvement of policies,

legislation and practices for forest inventory, timber supply planning, allowable annual cut determinations, silviculture, forest health, land-based research, climate change, and forest genetic resource management. Government's goal is to achieve sustainable management of British Columbia's forests. This includes the Gulf Islands.

Conclusion

Attempts by Trust Council to implement tree protection and tree cutting control through development permit areas have been denied in the past, and the implementation of tree protection bylaws is outside the Trust's jurisdiction, and SHOULD STAY THERE!

<https://www.youtube.com/watch?v=buC9lhjJS0>

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