

**From:** DICK VARNEY [REDACTED]  
**Sent:** Wednesday, January 20, 2021 6:53 PM  
**To:** northinfo; Lasqueti Island Local Trust Committee  
**Subject:** OCP review  
**Attachments:** OCP review 1.docx

Hi Peter and Tim,

Thank you for this chance to comment. I did not compare it to the LCA document, just tried to see if it was clear and a document that I would want to be guided by in the future.

Dick Varney

## OCP review 1

I recognize that a lot of work has gone into the proposed OCP by a lot of people, thank you all. The *italics are my opinion* vs Calibri are facts.

*I believe a few terms have not been explained well enough in the proposed OCP. These terms seem to form a major underlining of the proposed OCP about land stewardship, since they are in the GOALS and OBJECTIVES. Unless these terms are better explained, it will be difficult for anyone to be guided by the OCP in the future. I also believe the wording used does not meet the Island Trust's stated expectations in the "Protecting the Coastal Douglas-fir Zone & Associated Ecosystems - An Islands Trust Toolkit" for proposed OCP's.*

*I do not know if all the requirements of the **Local Government Act Part 14 - 473** are met and/or is this OCP exempt from the requirements. I did not observe evidence that most of the issues in 473 were included and mapped in the proposed OCP, but I may be incorrect. (The maps were not provided.) What would be clearer is if each part of the proposed OCP would have a set of goals and objectives (strategies) to guide future development and/or the Local Trust Committee (LTC). I would think in areas where the proposed OCP does not meet Provincial or Islands Trust requirements/expectations; this would be stated and related back to the islands goals/history/zoning. Most of these part 473 issues are for much more urban areas, but a strategy could be to ask the island community to consider these issues in the future (before the next OCP). A lot of new considerations/methods have been considered in the last ten years about OCP's, this proposed OCP does not mention the need to bring them up for community review. After OCP part 2 the word "shall" is only used three times; therefore the LTC is not required to be very directed by the proposed OCP and the OCP is open to almost any interpretation. The OCP is supposed to guide any new land use changes and zoning into the future by the LTC.*

TERMS as examples:

P6 "**Natural:** existing in or formed by nature." *What is natural if everything formed by nature is natural – One extreme meaning could be; I was formed by nature therefore what I do is natural, but I am sure that was not the meaning implied originally. Therefore the term is unclear unless explained better.*

*If we even just consider the terms "natural forest", were the forest conditions say in 1850 natural? Are today's dense forests natural? Are some other forest conditions natural? Are the forest conditions that promotes low-intensity fires natural? Are the forest condition that promotes high-intensity/crown fire natural? What about wind storms and other natural disturbances and their cumulative risks to wildfire intensity? What condition provides the least risk to wildfire and what condition the most potential maximum loss of island homes to wildfire? Actually "wildfire" is not even mentioned in the OCP document, much less the level of RISK of wildfire in our ecosystem. In "develop with care -2014" wildfires are considered to be a reasonable risk for planning within an OCP. This publication was made before the last 5 years of wildfires, and I believe more people now recognize the increased risk of wildfires in dry ecosystems.*

*This forest we have today on Lasqueti, if dry and in a high wind situation, would probably burn as a stand replacement wildfire leaving patches of forest that have the characterizations of FireSmart (less fire ladders, crowns beginning quite high [>5m], and some distance between crowns). The UBC Centre for Conservation Genetics **climatic analysis:** puts the CDF zone at*

about the same dryness as the Bunch Grass (BG) zone and the Ponderosa Pine (PP) zone in the interior; both are dryer than the Interior Douglas-fir (IDF) zone. *This surprised me as I would have thought the CDF and IDF would have had similar dryness. I believe this is another sign, unrecognized, of the wildfire risk in the CDF. Where were the biggest wildfires in BC in the last few years? I surmise that our forests may burn like the fires of the last few years from California to central BC, if a fire starts during a real dry summer and grows because of high winds.* Not all wildfires are started by people on the coast. One lightning storm in July of 1941 set 240 wildfires in the Vancouver Forest Region and in the last few years two lightning storms have set multiple fires each on Vancouver Island, one of these were in much wetter ecosystems and units than the CDF.

P 9 Goals “... **integrity of the island ecosystem is maintained;**”... First I need to say that in my profession, (RPF) a GOAL has to be measurable. This does not seem to be a requirement for OCP’s where goals are statements of purpose, but if such a purpose was measurable it is easier to create objectives to work toward it. *Therefore how is integrity of ecosystem a purpose, unless it is explained better?* I found that the integrity of an ecosystem is considered to be reduced by 1. Natural disturbances... 2. Human use... 3. Introduction of new elements... (example most of our garden seeds). *Therefore how can we maintain integrity of an ecosystem that we all influence (2. & 3. above) negatively? I am sure, there more than ten other definitions of integrity of ecosystems. I think both integrity and ecosystem need their parameters explained better if they are to be a purpose statement.*

Islands Trust Conservancy’s “Regional Conservation Plan 2018 – 2027” demonstrates goals and objectives quite well (page 35-37).

*I believe each OCP GOAL point needs to be at least a sentence or more to explain it better.*

“Goals are general statements of purpose.” (According to “Protecting the Coastal Douglas-fir Zone & Associated Ecosystems - An Islands Trust Toolkit”.) *The proposed OCP heading 1.4 “Island Concerns and Issues” seems to be presented in a clearer manor then the same issues that follow the Goal heading. Then the objectives should probably relate back to each goal as a strategy to accomplish/work toward the goal.*

P 10 Objectives:

According to “Protecting the Coastal Douglas-fir Zone & Associated Ecosystems - An Islands Trust Toolkit” says “Objectives are strategies to achieve the goals.” The “Regional Conservation Plan 2018 – 2027” shows how its objective’s support ways to achieve each of the four goals. *I have trouble believing many of the objectives of the draft OCP are strategies leading to achieve the goals; they do not even relate back to a specific goal (the objectives almost seem to be goals). I do not believe this draft OCP meets the expectations in the Island Trust’s own Toolkit.*

“Objective 4 To **protect** and **restore** a diverse, productive, native forest understory with abundant natural regeneration of trees and other native species.” *Why protect and restore an understory? Does this mean, Policy 4 (below), really shows that the ecosystem is not as **resilient** as stated if it has to be restored? Does this mean people should not change the understory, remove, or underburn a stand of trees around their home? It seems this objective is contrary to FireSmart principles. I am sure that was not the objective but what was it is unclear?*

*“...**native forest understory** with abundant **natural regeneration of trees** and other native species.” Do we really want abundant native regeneration – it is this “over” abundant native regeneration since 1862 that has created much of our forests and the present density, with a higher wildfire intensity risk. This present dense condition of the local forests makes the forest less **resilient** than the forests were in 1850.*

*“Objective 5 To support the **protection** and **restoration** of abundant and productive native ecological communities in the terrestrial, freshwater, and marine ecosystems on and adjacent to Lasqueti.” What is **protection** and **restoration** of the terrestrial ecosystem (it seems two more words need to be explained)? Much less which **ecosystem** are we talking about (the present condition or a previous condition or a new condition of ecosystem?) All ecosystems need to be defined/limited so that they can be understood. What condition are we restoring to?*

*“Objective 8 To **formally protect** a sufficient proportion of the land...” Does such **formal protection** help protect Old-growth trees from wildfire? What about protecting present old-growth trees of Lasqueti, that have fire ladder conditions surrounding them right now, from a potential wildfire? Or Old-growth trees who’s stems are surrounded by debris mounds? What will happen to the dense stands we presently have if a wildfire happens?*

*“Policy 4 The inherent **resiliency** of the Island's eco-systems should be maintained in conjunction with resource stewardship.” I would like to point out that in my professional opinion the **resiliency** of our forests has been dropping since 1862 because of the exodus of the First Nation people who lived here and used fire to manage the forest. I believe the wildfire intensity risks have increased since 1862, which should be considered a lowering of resiliency. But the commercial quality of our new trees are probably of better quality.*

The CDFCP (coastal Douglas-fir conservation partnership) goal #5. “Support active ecosystem management. Without active management (stewardship), even protected areas may lose ecosystem integrity. By 2045, it is hoped that protection and stewardship of CDFAE will be an integral component of the plans, policies and management activities of all governmental, private and non-governmental land managers.” (CDFCP Conservation Strategy, 2015)

Many of the other objectives & policies in the draft OCP seem to me to be unclear and open to multiple interpretations. I understand this document was written by Island Trust Planners, but the (**Lasqueti Community Association** [2020 January](#) - OCP Steering Committee Recommendations Report) was the background. This does not make it a plan you or I would want to be guided by in the future. I think it needs work.

Thank you for your consideration, I am available to provide clarification.  
Dick Varney, RPF (landowner)