Craig, Vanessa Feb 27, 2022, 9:00 PM

to me

Hello John,

Thank you for your email. For your information I've attached a staff report and the FMP. I'm happy to speak with you to discuss this.

I can assure you that before any work is actually done there will need to be a staff report, public consultation and funding in place. In addition work would need to occur outside of fire risk windows as well as breeding bird windows. This work was done based on strong concern expressed by the Fire Chief and GVFD about fire risk associated with unhoused people sheltering in the park, and the fire department was consulted by Diamond Head repeatedly during the contract.

I have written a response to some concerns I have heard from GROWLS and on Facebook – I include that information below (so it may include some information not reflective of your concerns).

Facebook post:

Hi everyone, thanks for your comments. The fuel prescription by Diamond Head (a well-respected company) was initiated through concern voiced by the Fire Chief as well as community members about the general risk of fire in the 707, and the specific issue of unhoused people potentially sheltering in the park. The intent of the FMP was to better understand the fire risk in the park and to assess the potential risk of people sheltering in the park. The prescription was completed using grant money received by the RDN. A fuel management prescription (FMP) has to follow BC Wildfire requirements and is necessary to have in place to get more funding to address the issue. The FMPs are based on forestry best practice principles. As part of the contract the consultants traversed the entire 707 park and selected a priority area to do a detailed analysis based on the highest risk - in that area of the park they identified the most flammable type of forest and an area that was closest to the highest density of residences. Although the content and approach of an FMP is defined by BC Wildfire, the FMP isn't a directive - it's more of a tool to help the RDN understand the fire risk and identify what would be required to address the risk. The question will be one of balance - between managing and addressing fire risk, and ensuring that we respect the fact that, as a park, we don't want it to look like a tree plantation.

The FMP was guided by the idea of creating "shaded fuel breaks" which is to retain and enhance canopy growth to enhance moisture retention and shrub growth while removing all of the dead stick

trees that can serve as "ladder fuels" between a ground fire and a crown fire. Diamond Head indicated that the 707 is an extremely unusual forest - it is very unnatural as any natural type of disturbance, whether fire, wind, insect or disease (or even typical forest management which would include retention of large or deciduous trees and potentially planting or thinning) would not result in a stand such as is present now. Removing the dense dead trees and retaining the larger trees and shrubby undergrowth would help reduce fire risk and also allow the trees to grow better and produce a healthier forest.

All that said, at this time there is no plan to start implementing the FMP. The next step will be a parks staff report indicating how this FMP and the note to file assessment about the potential impact of sheltering in the park should be addressed within the Parks Bylaw. As you may recall, there is currently a ban on people sheltering in the 707 Park until the fire risk issue could be assessed. This occurred within the larger discussion that, as per multiple Supreme Court rulings, unhoused people have a right to shelter in public areas within reasonable limits set by local governments (ie a blanket ban on sheltering in parks can not be implemented and in fact is what led to the Supreme Court challenges).

Any implementation of the FMP will need to have another report, funding in place, and will likely have a public consultation component prior to being implemented. Nothing is on the work schedule to be done at this time. As we move through this process of receiving a parks staff report on the Parks Bylaw (I'm not sure of the timing of this) I will keep you updated.

Note to GROWLS:

I know the FMP has created some concerns about what it will look like in a park. The way an FMP is created is laid out by the BC Wildfire Service and is a necessary step to be able to apply for grants to support the subsequent work. Important to note that this is not a directive - it's a tool for the RDN to better understand the fire risk in a forest and a recommendation on how to ameliorate it. That doesn't mean that the RDN has to follow it as written - the question is how reducing fire risk might look in this park - and I agree that is a big question. Of course any work done would need to respect breeding bird windows as well as high fire risk periods.

The consultants surveyed the entire park and identified the areas within it they felt had the greatest fire risk and potential repercussions of a wildfire close to residences.

The prescription for the 707 is primarily focussed on reducing the ladder fuels as well as ground fuels that would be created if trees are removed. The idea is to create “shaded fuel breaks” - to retain and enhance canopy growth to help with the moisture retention etc. and shrub growth while reducing the ladder fuels. The FMP indicates a goal to create a vertical gap of about 5 m between the crown of the largest trees and the next layer. This would mean removing the smaller trees and retaining larger trees (with a focus on retaining trees >10 cm diameter at breast height)

and deciduous trees (it identifies deciduous trees as a priority for retention), shrubs, as well as wildlife trees. The shrubs will help maintain moisture in the forest floor. Shrubs aren't mentioned for removal in the prescription - it focussed solely on trees. Looking at the prescription it says there are approximately 592 trees/ha that are >12.5 cm dbh - according to the prescription all of those trees are to be left on the site. The vast majority of these are Douglas-fir but there are some large cedars and some smaller alders, hemlock, and arbutus to be retained. The bulk of the trees that would be removed would be trees up to 7.5 cm dbh of which they calculate there are about 3400 trees/ha, about 600/ha of which are already dead. The remaining small trees that are still alive now are likely going to die due to crowding and shading, as Douglas-fir requires light to grow.

Any fire is more likely to start on the ground, and the dense and dead trees create a connection to the low crowns. With climate change the issue of a dry forest will remain and potentially increase. The intent of a prescription like this would be to accelerate the progress of the forest to a more mature state which includes a forest that has a multi-layered canopy with larger trees and a more open understorey with lots of understorey shrubs. A forest after disturbance will naturally move towards a diverse multi-layered canopy. With natural disturbance such as fire, insect, disease or wind, this happens regularly due to the fact that the disturbance tends to happen in pockets and doesn't remove all of the trees in an area. With forest harvesting, management typically includes retaining some trees to provide diversity, planting trees and thinning etc all in the effort to promote a diverse forest that is multi-aged and multi-height forest. This didn't happen with the 707 and has resulted in a very unusual forest. In fact Diamond Head and the RDN staff who have done a lot of work in forests have never seen a situation like the 707 forest and considered it very unnatural. That's the reason they indicated they weren't sure how the forest would respond to a treatment - because it is so unusual.

Re wildlife trees the following is included in the FMP: "No large snags were identified during field work. However scattered larger (>35 cm DBH) trees remain at a very low density (approximately 15/ha) throughout the treatment area. These higher wildlife value trees should be retained unless dangerous. High wildlife value tree criteria is discussed in the Wildlife/Danger Tree Assessor's handbook." The handbook does provide more information about what would be considered a wildlife tree. It doesn't sound like snags would be common, but I suggest that an appropriate response would be establishing no-go areas around important trees rather than having to remove them as I agree that large snags are an important wildlife habitat.

We are so fortunate to have this park on our island. It's great as a recreation spot and over time it will become even better and more beautiful as it recovers from its past logging and becomes a mature forest, when it will serve an even more important function as wildlife habitat. The forest will naturally thin out and the trees will get bigger over time. In the interim, given its very unusual (lack of) management, it poses a risk. I agree the prescription sounds extreme but the

prescription won't necessarily be exactly reflected on the ground. At its root the prescription to my mind is accelerating the forest's progress towards a healthy mature forest – where you see big trees with a canopy creating a nice shady moist understorey which is pretty open but has lots of healthy shrubs in the understorey. A mature forest has diversity – both in terms of tree species (deciduous trees are a natural fire break), canopy height and understorey. The area they identified as the highest risk has even-aged trees without much diversity with a lot of dead trees that are clumped together because they've been shaded out, or are likely to die because they're small and heavily clumped together and will not get sufficient sun. Those trees would carry a ground fire into the canopy. The prescription suggests creating a more open forest which would allow the trees to grow faster and the understorey to develop and would reduce the chance that a ground fire would be carried into the canopy.

Having said all this, I agree that the FMP isn't geared to a park and am in conversation and will continue to be in conversation with staff about what work can look like. Can it be scaled back, done by hand etc. – how can we achieve the overall goals of reducing fire risk in the specific areas that the consultants have identified as highest risk while recognizing that it's a park, and being gentle in the treatment to help accelerate the opening of the forest so that more understorey and deciduous species can grow and allow the bigger trees to grow faster. Prior to any work there would need to be a report to the Board, funding in place, and public consultation - nothing is planned for 2022 at this point.

Eventually we will have a beautiful old-growth forest in the heart of Gabriola, one that will be naturally more resistant to fire due to the tree heights and tree size as well as the diverse understorey that will help retain moisture on the forest floor. The question is whether the current young forest can be managed now to help reduce the fire risk (as if a fire goes through there it will have significant implications to the speed of its regrowth as well as to the surrounding neighbourhoods) and create conditions where trees grow faster and the understorey can grow in.

I hope this helps address some of your questions John. If you have additional questions or would like a follow-up conversation please let me know.

Vanessa