

2017 HAIDA GWAII PROPOSED LAND USE OBJECTIVES ORDER

SUMMARY OF PUBLIC COMMENTS AND RESPONSES

Proposed amendments to the Haida Gwaii Land Use Objectives Order (HGLUOO) were posted for a 60-day public review and comment period from February 3 to April 4, 2017. Comments were received from six members of the public during this period. Forest tenure holders also had an opportunity to review the draft amendments with the Haida Gwaii Management Council (HGMC) on April 24, 2017. No written comments were received from forest tenure holders.

The following table summarizes comments pertaining to proposed amendments to the HGLUOO and responses to these comments.

Section of Interest	Comments	Response
6. Haida Traditional Forest Features	Reserve zones for Class 1 Haida Traditional Forest Features (HTFFs) should not be modified. Class 1 HTFFs should not be altered or removed. Stink currant needs more protection (Class 2 HTFF).	The proposed amendments balance increased flexibility in specific circumstances with additional safeguards to protect these features, including the requirement for an inter-governmental process (IGP).
6(8) and 6(9). Indian hellebore	Contrasting views were expressed on the need for protection of Indian hellebore: 1. Greater protection needed due to sensitivity of Indian hellebore to soil and hydrological changes; 2. Removal from the list of traditional forest features, given abundance of Indian hellebore on Haida Gwaii.	The proposed order retains the requirement to maintain the integrity of 50% of Indian hellebore features. The abundance of Indian hellebore is a factor in the rationale for allowing harvest next to Indian hellebore features. Machine-free zones are required around these features to protect sensitive soils.
13. Upland stream areas	Upland stream areas need greater protection. Concerns cited regarding implementation of this objective by forestry operators.	The proposed order maintains the existing protection measures for upland streams. The HGMC is reviewing concerns regarding the implementation of this objective.
18(6). Black bear dens	Support for proposed requirement to submit digital data showing locations of Black bear den reserve zones. Black bear dens need greater protection. Fewer Black bear dens are identified by forestry operators than expected.	The existing order requires all Black bear dens be protected, documented and reported. The HGMC is reviewing concerns regarding reporting levels.
11. Type I and II Fish Habitat	Current protection for fish habitat is inadequate and no further alteration or removal should be allowed.	The proposed amendments balance increased flexibility in specific rare circumstances with additional safeguards to protect these features, including the requirement for an inter-governmental process (IGP).

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Respondents also provided the following comments regarding aspects of the HGLUOO not subject to any proposed amendments:

- Yellow Cedar requires more protection as it is threatened by climate change. Yellow cedar is not being replanted.
- Western yew requires increased protection.
- Goshawk nesting reserves should be enlarged as they are inadequate to support breeding pairs. Foraging areas should be managed around nesting reserves.
- Surveys of Saw-whet Owl nests should be undertaken by professional biologists to ensure sufficient field identification of nesting reserves.

Response: Yellow cedar decline on the coast is the subject of ongoing research and monitoring by the Ministry of Forests, Lands and Natural Resource Operations, the Council of the Haida Nation, and the University of British Columbia. Replanting yellow cedar is a requirement of the HGLUOO. Section 8 of the HGLUOO requires protection of all Western yew patches within stand level retention and protection of individual yews where practicable. Monitoring in 2016 indicated that 74% of all yews in a development area were maintained in stand level retention. In addition, the HGLUOO requires all discovered Northern Saw-whet Owl nest areas to be protected, owl research has been under way, and the HGMC will look into the current process for managing Saw-whet Owls and determine if further action is needed. In response to the draft Federal Recovery Strategy, the Province has published an [implementation plan](#) to address habitat pressures on Northern Goshawks.

Several general comments were also received from respondents on the following topics:

- Request for more public meetings and engagement of forestry field staff in consultation on the HGLUOO.
- Suggestion to map proposed harvest areas in watersheds along with a folio of biophysical, ecological and recreational resource features.
- Desire for more local economic benefits from forestry and local access to forest products.
- Need for increased protection of wetlands and salmon-bearing watersheds.
- Forest management must adapt in response to climate change; suggestion to sell forest carbon credits.

Response: The HGMC is working to increase public engagement. Although public open houses have been held in the past, the changes proposed for 2017 were not deemed significant enough to warrant public meetings. The importance of climate change adaptation is acknowledged and is the subject of ongoing research and policy development. Endeavouring to implement ecosystem-based management, in part through the HGLUOO may offer more resilience in the face of climate change in comparison to other models of forest management. Both CHN and the Province have received revenue from the sale of carbon credits generated in part through the initial establishment of the HGLUOO in 2010.