



June 25, 2018

Honourable Ranj Pillai, Minister of Energy, Mines and Resources
Government of Yukon
Box 2703
Whitehorse, Yukon
Canada, Y1A 2C6

Minister Pillai,

Re: Submission regarding Developing a Resource Roads Regulation for Yukon

This letter is intended to be a submission on behalf of the Yukon Fish and Wildlife Management Board to the Department of Energy, Mines, and Resources regarding the development of a new Resource Roads Regulation. As per the Umbrella Final Agreement and the Yukon First Nations Final Agreements, the Board is the “primary instrument of Fish and Wildlife management in the Territory”, and as such has a responsibility to engage with Yukon Government on any issues related to fish and wildlife and their habitat.

The Board has compiled the following comments with regards to the development of a new Resource Roads Regulation for Yukon, based on some of the sections of the proposal and questionnaire provided in the consultation process:

Controlling Access & Managing Shared Use of Resource Roads

Increasing access to wilderness is one of the critical issues the Board is currently dealing with. It is known that some hunters use private resource roads to access areas of wilderness that were previously less accessible, negatively affecting wildlife populations these areas. The Board believes that the new Resource Roads Regulation should address how physical barriers (ie. gates) will be maintained and how access restrictions (ie. permits and multi-use agreements) will be enforced on new and existing resource roads.

Closure and Decommissioning of Resource Roads and Security

The Board supports the proponents requirement to develop a closure and decommissioning plan to obtain a resource road permit. That being said, the Board has concerns with proponents abandoning projects and the Yukon government having to provide bailout funding for remediation. The Board would like to see the new Resource Roads Regulation provide

clarification on how much funding would be available for remediation of decommissioned resource roads, and that the money should be held outside the Yukon government.

How Will the Permitting Work?

Should permitting beyond the construction phase be implemented, the Board would like to see priority placed on permit conditions for minimizing impact to wildlife and habitat, through route choice, construction methods, road standards (as mentioned in Section 5 of the proposal), and access permissions.

Compliance and Enforcement

As mentioned above, the Board is concerned with the enforcement of access to wilderness through private resource roads. The Board supports the idea of access permits and additional compliance and enforcement tools, with sufficient resources (funding and capacity) to effectively put these measures in to place.

How will the Resource Roads Regulation Work with Other Legislation?

While we understand the Resource Roads Regulation and the Off Road Vehicle Regulations are separate processes, the Board would ultimately like to see these regulations work in tandem to better manage access to Yukon wilderness.

On a process level, the Board has had some frustrations regarding scheduling conflicts with both recent workshops for the Resource Roads Regulation and Off Road Vehicle Regulations, despite having told the Department of EMR well in advance that we would be unable to attend on the chosen dates. For future workshops and meetings in this process, the Board would like to see the Department do its best to provide a time where the Board can be present, as the Board is a critical voice for fish and wildlife in the territory and has a standing as an Interested Party (as per the UFA) in all related matters.

Thank you for your time in considering this submission, and please contact the Board's Executive Director Graham Van Tighem with any questions (executivedirector@yfwmb.ca or 867-667-5335).

Sincerely,



John Burdek

Chair, Yukon Fish and Wildlife Management Board