



Nicole Hulstein
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Energy, Mines and Resources
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October 30, 2009

Dear Ms. Hulstein:

The Alsek Renewable Resource Council (AlsekRRC) has reviewed the proposed Forest Resources Regulations and have the following comments:

We still have concerns with wood lots and the possibilities of proponents applying for these cleared areas for residences and or agricultural areas. There is currently no land use plan in the Champagne Aishihik Traditional Territory, and we are very concerned with unplanned land use and the opening of the hinterland.

RRCs are not mentioned as a recommending body as is the case under Chapter 17 of the Champagne Aishihik First Nations Final Agreement. These proposed regulations and the Forest Resource Act offer very little mention of the roles and responsibilities of Renewable Resource Councils to forestry and wildlife. The spirit of Chapter 17-17.4.0 to 17.4.5 seems to be largely missing throughout these Acts and regulations. As most all areas in forests would also be considered habitat the RRC would also note that 16.6.11 grants status to as "an interested party to participate in public proceedings of any agency, board or commission on matters the affect the management and Conservation of Fish and Wildlife and their habitats within the relevant Traditional Territory for which that Council was established." A shared approach to any planning, has been the status quo, and we are left wondering how this relationship will continue.

We found much of these proposed regulations to be vague. Forest resource permits can be issued, but there is no mention of the parameters for these,

whether they will prohibit users from a spot commonly used, or mitigation for possible conflict they may cause. Trapper compensation is still not resolved by this Department, and trapping opportunities could be further diminished. The AlsekRRC is also concerned about how the process for authorizing and decommissioning of forest resource roads will take place. We have stated our concerns to the Department in the past around these new accesses into the hinterlands and still remain very concerned about their effects on wildlife and the opening of the back country.

Lastly, the AlsekRRC is already on a tight budget. Reviewing applications, recommending to First Nations and Yukon Governments, providing honoraria for sending members to meet with planning teams etc., researching, and responding to the YESAB process all take considerable amounts of time and resources. These new processes will require a financial contribution from this Department as stated under Ch.17-17.4.5. for RRCs to be able to contribute fully.

Thank you for the opportunity to comment,

Yours truly,

Susan Desjardins
Executive Director
Alsek Renewable Resource Council