

# Spring 2007 Request for Postings

## Environmental, Socio-Economic and Surface Access Concerns

The following provides a description of the comments received during the public notice and review of the *Spring 2007 Request for Postings* (RFP). The government's response follows the description of each issue. Where appropriate, suggestions and recommendations are proposed for how the respondents interests are addressed in the Call for Bids (CFB).

### 1. Land Use Planning

#### What We Heard:

The issue most frequently raised during the review period was the request for completion of regional land use plans in the North Yukon and the Peel Watershed prior to any resource development. The concern is based on the desire for identification and protection of areas of high environmental value before any large tracts of land are committed to oil and gas development. Many of the Vuntut Gwitchin First Nation (VGFN) comments were based on draft recommendations in the North Yukon Regional Plan.

Government Response: The Government of Yukon has stated in the strongest possible terms that it supports land use planning. It is important to note that the RFP is only the first step in a long process towards disposition of oil and gas rights, and that there is still the requirement for a complete socio-economic and environmental review under the *Yukon Environmental and Socio-Economic Assessment Act* (YESAA), as well as the need for all necessary permits prior to any activity taking place on the ground. The Department of Energy Mines and Resources (EMR) considered the draft North Yukon Regional Plan and will make every effort to coordinate future disposition activities with the final plan's recommendations. The Peel Commission has advised that the projected completion date for a draft Peel Watershed Regional Plan is December 2008. It is unlikely that any activity arising from this RFP would take place prior to that date, therefore it is expected there will be time for review and consideration of draft recommendations during the permitting and assessment stages of any activity.

The Government of Yukon believes that the licensing requirements and environmental assessments of oil and gas exploration and development activities will provide for fair and responsible consideration of multiple land use concerns and interests. Chapter 11 of the First Nations Final Agreements does not contemplate restricting government's ability to grant an interest or authorize the use of land, water, or other resources before regional land use plans are approved. Rather, the Final Agreements provide for linkages between regional land use planning and other land and water management processes.

Conducting the disposition oil and gas rights in the North Yukon or Peel River watersheds will not preclude the consideration of other values and interests which would

normally be taken into account in a broader land use planning process. In the absence of a completed land use plan, public and First Nation discussions about oil and gas development in these regions will still occur in accordance with the disposition process to ensure that land use concerns are considered.

Departmental Recommendations: The Government of Yukon will continue to participate in and support regional planning, as well as monitor draft planning documents to ensure existing and future activities comply with draft and eventually final plan recommendations.

### **Call for Bids Statement: Land Use Planning**

Land Use planning is currently underway in northern Yukon. In order to ensure that existing and future activities comply with draft and eventual final plan recommendations the Government of Yukon will continue to participate and support regional planning in the North Yukon and Peel Watershed Planning Regions. Information about the status of the North Yukon Regional Plan and the Peel Watershed Region Plan can be found at [www.nypc.planyukon.ca](http://www.nypc.planyukon.ca) and [www.peel.planyukon.ca](http://www.peel.planyukon.ca), respectively.

## **2. Porcupine Caribou Herd (PCH)**

What We Heard: The importance of caribou to First Nation citizens, and the need to protect the caribou habitat in northern Yukon was raised by many respondents, in particular VGFN and the Porcupine Caribou Management Board. The North Yukon Planning Commission (NYPC) noted that the fall to late winter habitat of the PCH occurs in portions of CFB Location 2007B002.

Government Response: The Government of Yukon is currently developing a set of best management practices that will, along with mitigation measures, address the potential interactions of caribou with oil and gas activities. We will continue to work with government agencies, First Nations, and stakeholders to develop best management practices and ensure the most up-to-date information is used in planning and assessing oil and gas activities. The Government of Yukon feels that these measures will address the concerns raised during the RFP review.

Departmental Recommendations: The Government of Yukon should continue to support the initiatives of the VGFN and other northern First Nations to ensure the integrity and protection of the PCH and other northern caribou populations, and their critical habitats, especially their calving grounds. *Oil and Gas Best Management Practices for Caribou* have been drafted and will undergo peer review in the near future. The Government of Yukon is confident that the use of best management practices and mitigation measures will ensure the protection of the PCH and other northern caribou populations.

### **Call for Bids Statement: Porcupine Caribou Herd**

The protection of the Porcupine Caribou Herd, as well as other caribou herds, in northern Yukon was one of the most frequent issues raised during the review of the *Spring 2007 Request for Postings*. Oil and gas best management practices for caribou have been drafted and will undergo peer review in the near future. The Government of Yukon is

confident that the use of best management practices and mitigation measures will ensure the protection of the Porcupine caribou herd and other northern caribou populations.

### **3. Wetlands**

What We Heard: The importance of two specific wetland complexes was highlighted during the public notice and review process: Turner Lake, and Whitefish-Porcupine Lake. Respondents want to ensure the integrity of the wetlands is maintained, and some called for the deletion of portions or all of these wetlands from this disposition process. The draft North Yukon Regional Plan recommends the Whitefish-Porcupine Lakes Zone become a protected area.

Government Response: Wetlands are considered to be among the most productive ecosystems in northern Yukon. In most cases access and activity in wetlands should be restricted to specific operating windows, for example in winter months, when there is sufficient ice and snow cover to protect soil and vegetation. The one method for additional protection of bird and wildlife populations and habitat is limiting access to specific operating windows.

The Government of Yukon is committed to actively working in collaboration with First Nations, government agencies, and other organizations to gain a better understanding of the Yukon's sensitive wetlands and in the development of wetland policies to ensure the sustainability of these ecologically important areas. The development of a suite of best management practices and mitigation measures will help industry and regulators understand and conserve wetland functionality, and will effectively address concerns related to potential impacts to these wetlands. *Oil and Gas Best Management Practices for Wetlands* has been drafted, peer-reviewed, and is expected to be published on the Oil and Gas Management Branch (OGMB) website in the near future.

Departmental Recommendations: The Government of Yukon should ensure that appropriate operating windows are applied to activities carried out within, and in proximity to, the Turner Lake and Whitefish-Porcupine Lake wetland complexes in order to reduce disturbance during sensitive periods such as waterfowl migration, staging, and nesting. In consideration of concerns and recommendations from VGFN, and identified through the North Yukon Regional planning process, a portion of Request for Posting 2007S020 in the Whitefish-Porcupine Lakes wetland complex was removed prior to the Call for Bids.

#### **Call for Bids Statement: Wetlands**

The importance of two specific wetland complexes was highlighted during the review of the *Spring 2007 Request for Postings*: the Turner wetland complex (CFB Location 2007B017) and the Whitefish-Porcupine Lake wetland complex (CFB Location 2007B001). Oil and gas best management practices for wetlands have been drafted, peer-reviewed, and are expected to be published on the OGMB website in the near future. The Government of Yukon is confident that the use of best management practices and mitigation measures utilizing, for example, seasonal operating windows for activities within and in proximity to wetlands during sensitive periods such as waterfowl migration,

staging, and nesting, will ensure the protection of the northern Yukon's wetland complexes.

#### **4. Water Quality and Fisheries**

What We Heard: The maintenance of water quality standards and fish habitat was identified as being important to many participants in the public notice and review process. The Department of Fisheries and Oceans provided some very specific recommendations including "any pumps should be screened to prevent entrainment and impingement of fish in the screen". The First Nation of the Na-cho Nyak Dun (NND) identified the Peel and its tributaries as being important fish habitat and traditionally used by the Tetlit Gwich'in Council (TGC). The Yukon Salmon Committee provided specific advice such as "Detonation of explosives for seismic can damage the internal organs of fish and the detonation by-products such as ammonia can be toxic to fish". A small section of the Whitestone River is confirmed as a Chinook spawning area, and potentially Chum salmon spawning habitat.

Government Response: Impacts on fish habitat and use of water is carefully controlled and monitored by several government agencies including the Yukon Water Board, the federal Department of Fisheries and Oceans, Environment Canada and the Yukon Department of Environment.

Departmental Recommendations: Environmental assessments of activities will be required under YESAA and companies will be required to obtain all necessary permits.

#### **Call for Bids Statement: Water Quality and Fisheries**

The importance of maintaining water quality and functioning watercourses was identified by First Nations and government agencies. Impacts on fish habitat and water use is carefully controlled and monitored by several government agencies including the Yukon Water Board, the federal Department of Fisheries and Oceans, Environment Canada, and the Yukon Department of Environment.

#### **5. Conservation and Wildlife**

What We Heard: Interest in conservation and wildlife was reflected in the responses from several stakeholder groups, government agencies, and individuals. There were concerns about potential loss of habitat, habitat fragmentation, significant sensorial disturbances, reduced access to high quality forage, negative impacts of increased access, stream sedimentations, alteration in predatory-prey interactions, damage to soil, and increased noise. The current regional planning work has identified several areas in northern Yukon as requiring a high conservation focus. Areas of particular ecological and cultural importance include the Eagle-Bell-Rock River area, the Whitefish-Porcupine Lake area, and the Peel River.

In addition to comments about the Porcupine Caribou Herd, there were also concerns raised about the Bonnet Plume woodland caribou herd, and waterfowl and raptors. The raptor species include peregrine falcons, eagles, and ospreys. The Peel River area is an important nesting ground and feeding area.

Government Response: The Government of Yukon wants to ensure that oil and gas development occurs in an environmentally responsible manner. During the disposition process in 2004, the OGMB worked with other government agencies, First Nations, and stakeholders during the information gathering phase of the process to develop a table of proposed mitigation measures. (This table was also a valuable tool used in the development of best management practices for oil and gas activities.) The Government of Yukon believes that by applying best management practices and mitigation measures, sufficient safeguards are in place to protect the ecological values of the areas requiring a high conservation focus. As well, adjustments are proposed to RFP submission 2007S020 prior to proceeding with a Call for Bids.

Departmental Recommendations: Industry will be required to follow best management practices and all required mitigation measures to ensure the conservation of areas with a high conservation focus. Such measures include seasonal restrictions of activities to reduce industrial disturbance of fish, wildlife, and their habitat; and strict management of drilling fluids and waste. Environmental assessments of activities will be required under YESAA, and companies will be required to obtain all necessary permits and meet all conditions that are required to safeguard the environment.

#### **Call for Bids Statement: Conservation and Wildlife**

It is the desire of the Government of Yukon to ensure that Yukon's oil and gas industry is developed in an environmentally responsible manner. The Government of Yukon is confident that the use of best management practices and mitigative measures will ensure the protection of areas with a high conservation focus.

#### **6. Cumulative Effects**

What We Heard: Concerns about cumulative effects were expressed by many respondents, particularly with respect to potential impacts on rivers and the Porcupine Caribou Herd. While there is an understanding that the RFP is the first step of many in the disposition of oil and gas rights, suggestions were made about how to monitor and address cumulative impacts. Regional land use planning thresholds were identified as one cumulative effects management strategy. As well, the Porcupine Caribou Management Board suggested instituting a long-term monitoring program consistent with the CircumArctic Rangifer Monitoring and Assessment Network, the NWT Cumulative Effects Assessment and Management Strategy and Framework, and the NWT Cumulative Impact Monitoring Program. The Yukon Conservation Society expressed their concern that the YESAA Board may not have the capacity to evaluate oil and gas cumulative effects.

Government Response: It is important to clarify that the RFP is the first step towards the disposition of oil and gas rights. There are no activities or project proposals at this time; therefore there is no activity on which to conduct an environmental or cumulative effects assessment. The YESAA requires that an environmental assessment be conducted on all oil and gas activities. Environmental assessments include an analysis of cumulative effects. With respect to thresholds in regional planning, the OGMB has reviewed the

proposed threshold levels and does not anticipate that future activities will exceed the recommended limits. The Government of Yukon will continue to work with industry to ensure that environmental and cumulative effect assessments are rigorous and include all known and planned activities. The concerns raised by respondents of long term impacts of oil and gas projects that may occur in the future are valid. However, YESAA does not, and cannot address unknown projects or activities that may or may not occur at sometime in the future.

Departmental Recommendations: Environmental and cumulative effect assessments of oil and gas development will be required as part of the overall environmental impact assessment under YESAA. The Government of Yukon will ensure that thresholds identified in approved regional plans are followed and maintained.

### **Call for Bids Statement: Environmental Assessments and Cumulative Effects**

No specific statement in the Call for Bids is required to address environmental assessments and cumulative effects as prospective bidders are encouraged to familiarize themselves with legislation and other documents that will affect oil and gas activities.

## **7. Heritage and Community Use**

What We Heard: The importance of preserving traditional uses and cultural values was highlighted by First Nations and supported by the YG Heritage Branch. The North Yukon Planning Commission has recorded many community and traditional heritage sites throughout the Eagle Plain oil and gas basin Call for Bid Locations.

The VGFN identified the majority of the CFB locations in the Eagle Plain basin as having moderate to extremely high cultural importance. In particular VGFN noted that the Whitefish-Porcupine Lake wetland complex with CFB Location 2007B001, and the Eagle and Bell Rivers that flow through CFB Locations 2007B002 and 2007B004, have extremely high cultural importance. The Peel River (to the south of the Eagle Plain CFB locations), and the Whitestone River and its tributaries located in CFB Locations 2007B015 and 2007B016 were also highlighted as having significant cultural importance to the VGFN.

The VGFN expects companies to partner with them when conducting heritage, archaeological, ethnographic, and contemporary assessments within VGFN traditional territory. VGFN has identified and maintains records of areas and sites of cultural significance.

The TH (Tr'ondek Hwech'in) wrote that there are traditional routes in CFB Locations 2007014 and 2007016.

The Yukon Heritage Branch stated that there is high heritage potential along the Peel and Porcupine Rivers, and several archaeological and historical sites were identified in specific locations. Within Call for Bid locations 2007B009 and 2007B013 a number of

areas of high to moderate archaeological potential were identified by companies conducting seismic activities in these areas, and two trails were identified.

The North Yukon Regional Planning Commission has mapped a number of the heritage values and traditional and cultural use areas within the Eagle Plain oil and gas basin. In particular, the Whitefish-Porcupine Lakes wetland complex in 2007B001 was one of the most ecologically and culturally important within the North Yukon Planning Region. Also, CFB Locations 2007B002 and 2007B004 have very high ecological, heritage, and cultural values.

Government Response: Permittees are required to comply with the *Yukon Historic Resources Act* which requires that any “finds” of heritage sites, historic sites, or objects, be reported and left undisturbed. In addition YG has developed *Best Management Practices for Historic Resources*. The Government of Yukon also expects companies to work in collaboration with First Nations to identify and conduct activities in such a way that culturally sensitive areas are not negatively impacted by oil and gas development.

Departmental Recommendations: When companies proceed with any activity in specific areas, any known heritage and cultural information will be identified to ensure protection, and BMPs for historic resources will be provided.

#### **Call for Bids Statement: Heritage and Community Use**

Northern First Nations have identified community use, traditional use, and culturally significant sites throughout the Call for Bid Locations. The Vuntut Gwitchin First Nation noted that the Whitefish-Porcupine Lake wetland complex within CFB Location 2007B001, and the Eagle and Bell Rivers that flow through CFB Locations 2007B002 and 2007B004, are of extremely high cultural importance to their citizens. The Peel River, to the south of the Eagle Plain CFB Locations, and the Whitestone River located in CFB Locations 2007B015 and 2007B016 have significant cultural importance. The First Nation of the Na-cho Nyak Dun, Tetlit Gwich'in Council and Gwich'in Tribal Council emphasized the cultural importance to their citizens of the Peel River in CFB Location 2007B001.

Many of the sites in the Eagle Plain CFB Locations have been mapped by the North Yukon Regional Planning Commission. Prospective bidders may wish to review the Heritage Values and Traditional & Current Land Use map found on their website [www.nypc.planyukon.ca](http://www.nypc.planyukon.ca).

Government of Yukon, Heritage Branch identified archeological sites in CFB Locations, 2007B009, 2007B013 and 2007B014, and a high potential for additional sites along the Peel and Porcupine Rivers.

The Government of Yukon is confident that known and potential cultural, heritage, and historic sites will be protected through the use of such practices as the *Best Management Practices for Historic Resources* website [www.emr.gov.yk.ca/oilandgas/best\\_management\\_practices](http://www.emr.gov.yk.ca/oilandgas/best_management_practices)); and through companies

work in collaboration with the First Nation government heritage offices when undertaking surveys or assessments.

## **8. Climate Change**

What We Heard: Concerns about climate change and variable permafrost conditions were identified in the review. Individuals and groups with strong conservation interests generally oppose oil and gas activity due to concerns about global warming, greenhouse gas, and the use of fossil fuels. First Nations advised that local residents who spend time on the land are the best experts to advise companies on localized ground conditions and how this could impact oil and gas activities.

Government Response: The Government of Yukon is implementing the Climate Change Strategy that includes the goals of enhancing awareness, reducing greenhouse gas emissions, adapting to climate change impacts, and supporting climate change research.

The prevention and minimization of thermal degradation in areas with permafrost is important. The goals of best management practices include minimizing disturbance, conserving vegetation and surface soil, avoiding permafrost disturbance, and setting the stage for eventual restoration. *The Best Management Practices for Seismic Exploration* includes supporting low impact practices to reduce effects on the landscape.

Departmental Recommendations: Ensure future activities minimize impacts on permafrost. Encourage companies to consult with local experts and ensure best management practices are followed in order to minimize ground disturbance, avoid disturbing permafrost, and that appropriate restoration occurs.

### **Call for Bids Statement: Climate Change**

Northern First Nations have stated that the climate in northern Yukon has changed in recent years. They expressed concern that because of these changes oil and gas activities may damage the ecology and permafrost. The Government of Yukon is certain that the ecology of northern Yukon will be protected through the use of best management practices, such as those for seismic exploration found on the OGMB web page [www.emr.gov.yk.ca/oilandgas/best\\_management\\_practices](http://www.emr.gov.yk.ca/oilandgas/best_management_practices).

## **9. Wilderness Tourism**

What We Heard: The Wilderness Tourism Association of the Yukon identified the Dempster Highway, the portion of the Peel River that flows through 2007B001 and other rivers in the Peel watershed (for example the Wind, Bonnet Plume, Hart, and Ogilvie Rivers) as being increasingly used by the wilderness tourism industry. Department of Tourism and Culture, North Yukon Tourism Strategy and the draft North Yukon Regional Land Use Plan identify the Eagle and Porcupine Rivers as important for current and potential tourism in North Yukon.

Respondents also advised that the visual impacts of oil and gas activities along travel corridors can have serious effects on the wilderness tourism industry. The maintenance of scenic viewscapes is especially important to the general tourism industry. Visual impacts

are also a concern for other users of the backcountry, and in particular for traditional and cultural First Nation activities, especially around settlement lands.

Government Response: Best management practices that help reduce conflict with wilderness tourism operations include identifying and avoiding key wilderness tourism travel corridors, minimizing visual impacts, providing buffers and setbacks between exploration and development projects, and seasonal variation in activities.

Departmental Recommendations: When companies proceed within any activity in known wilderness tourism corridors and sites, impacts will be reduced by supporting BMPs, particularly within CFB Location 2007B017 along the Peel River. In addition, direct communication between companies and wilderness tourism operators will be encouraged to address specific concerns and review potential mitigation measures.

### **Call for Bids Statement: Wilderness Tourism**

Wilderness tourism is an active and important part of the economy in northern Yukon, especially along the Peel River (CFB Location 2007B0017), and the Dempster Highway.

The Government of Yukon has worked closely with the Wilderness Tourism Association and YG Tourism and Culture to develop the *Best Management Practices for Wilderness Tourism* found on the oil and gas web page at

[www.emr.gov.yk.ca/oilandgas/best\\_management\\_practices](http://www.emr.gov.yk.ca/oilandgas/best_management_practices). Through the use of best management practices, Government of Yukon is confident that wilderness tourism will continue to be an important component of the economy of northern Yukon.

## **10. Best Management Practices**

What We Heard: The review comments indicated increasing familiarity and support for Best Management Practices (BMP). Respondents want to ensure that BMPs are rigorously applied by government as a standard to be met by industry.

Government Response: The OGMB is continuing to work with First Nations, stakeholder groups, industry, and other government agencies to finalize a suite of Best Management Practices for oil and gas activities in the Yukon. The Government of Yukon supports this initiative but agrees that BMPs alone are not sufficient to mitigate the effects of oil and gas activities. Best management practices will be used as a tool in combination with environmental assessments, the existing regulatory structure, and land use planning to help to ensure oil and gas activities are conducted in an environmentally responsible manner.

Departmental Recommendations: The Government of Yukon should complete its suite of Best Management Practices in a timely manner. In the future, BMPs should be used by regulators and industry to reduce the likelihood of negatively impacting sensitive environmental areas.

### **Call for Bids Statement: Best Management Practices**

The Government of Yukon continues to work closely with industry, First Nations, and other government departments in the development of a wide range of best management practices that will reduce the time, intensity, and duration of the footprint on the land base resulting from oil and gas activities.

## **11. Opportunities and Benefits**

What We Heard: For the future phases of oil and gas development, First Nations citizens reminded the Government of Yukon of the importance of ensuring strong communications between industry and First Nations governments. It was requested that companies be strongly encouraged and even directed to meet with First Nations at the onset of planning for exploration and development activities. The TH supports meaningful partnerships between government and industry. The VGFN expects companies to work with them to ensure that projects are conducive to the interests, values, and future of the VGFN. GTC/TGC requested preferential hiring measures for Gwich'in businesses and participants if activities occur within the Gwich'in Settlement Region.

Government Response: The Government of Yukon is committed to improving economic and employment opportunities of all Yukoners. Oil and gas development is seen as an exciting and viable option for improving these opportunities. The *Yukon Oil and Gas Act* requires that companies negotiate benefit agreements with affected Yukon First Nations and Yukon communities for work expenditures larger than \$1,000,000 per year, ensuring that First Nations have an opportunity to negotiate local opportunities with industry and government.

Departmental Recommendations: Permittees applying for a license may be required to conclude benefits opportunity agreements and shall adhere to the Yukon benefits requirements outlined in *Additional Information Regarding the Regulations of Oil and Gas Activities in Yukon* found on the oil and gas website. In addition, Permittees will be required to inform First Nations with traditional territories in license areas, of potential employment and business opportunities associated with operations conducted under authority of a proposed license. As the OGMB has contact with industry, they will continue to encourage and facilitate direct communications between First Nations and industry, particularly as companies make plans for, and prior to, beginning exploration and development activities.

### **Call for Bids Statement: Opportunities and Benefits**

Northern First Nations stressed the importance and need for strong communications between industry and First Nation governments at the onset of oil and gas development. Bidders are also encouraged to review the benefit requirements outlined in *Additional Information Regarding the Regulations of Oil and Gas Activities in Yukon* found on the oil and gas website at [www.yukonoilandgas.com](http://www.yukonoilandgas.com).

## 12. Surface Access

What We Heard: General concerns about increased vehicular access were expressed during the review of the RFPs. Specific concerns expressed related to new all-season access roads off the Dempster Highway and the concern for increased off-road vehicular use and the impacts on landscape. One suggestion is that public use of new roads and trails not be permitted. The North Yukon Planning Commission specifically recommended that all-season access not be permitted outside of a four kilometer corridor along the Dempster Highway. Department of Fisheries and Oceans noted the need for companies to follow the Operational Statements for small clear-span bridges and for ice and snow fill bridges when constructing any access corridors. In reference to the routing for the winter road access to Old Crow, VGFN advised of the need to “maintain the Old Crow seasonal route.”

Government Response: There are several best management practices for seismic exploration that address access concerns. These include the reduction of new public access and travel corridors, as well as managing the access needs of all users (for example industrial, commercial, recreational and subsistence activities). In cases where the impact of conventional seismic activities cannot be tolerated, access for low impact seismic or geophysical exploration could be allowed.

Departmental Recommendations: When companies propose specific exploration activities, access plans will be subject to best management practices as well as all necessary standards, permits, and environmental reviews. It will be recommended that companies contact YG Highways and Public Works regarding permits for temporary or permanent access points off the Dempster Highway.

### **Call for Bids Statement: Surface Access**

Concerns were raised by First Nations, government agencies and members of the Yukon public about new all-season access roads off the Dempster Highway, increased off-road vehicular use, and the potential visual impacts of access on the landscape. The Government of Yukon is confident that the use of best management practices and mitigative measures, such as those found on the oil and gas website for seismic activities at [http://www.emr.gov.yk.ca/oilandgas/best\\_management\\_practices.html#Seismic\\_Exploration](http://www.emr.gov.yk.ca/oilandgas/best_management_practices.html#Seismic_Exploration), will limit the detrimental effects of new access. Bidders are also encouraged to review regulatory requirements for access outlined in *Additional Information Regarding the Regulations of Oil and Gas Activities in Yukon* found on the oil and gas website at [www.yukonoilandgas.com](http://www.yukonoilandgas.com).

## 13. Other Issues

What We Heard: The need for a Trapline Compensation process pursuant to Section 16.11.13 of Yukon First Nation Final Agreements was identified by VGFN.

Government Response: The Government of Yukon is nearing completion of research on trapline compensation issues, and anticipates consultation and public review during the Fall/Winter of 2007-08.