

What We Heard

Proposed General Park Regulations

Stakeholder and Public Comments and Proposed Responses



The following table lists the comments provided to Environment Yukon on proposed changes to general park regulations. The consultation occurred from November 1, 2007 to February 18, 2008 with approximately 25 written comments received. The column titled “Possible Approach/Response” provides an indication of the government’s proposed options toward the comment and not a final decision.

Draft Regulation	Comment/Issue	Possible Approach/Response
1. <i>Definitions</i>	–The concept of “backcountry” needs a specific definition rather than “not front country”. Also need definitions for motor vehicle, boats, park boundaries; campground, recreational sites, recreation park, other park, and park facilities.	–The concept of backcountry will be uniquely defined for each park as part of the management planning process which will involve extensive First Nation and Public consultations.
9. <i>Overnight camping permit limit to 6 campers per site</i>	–Wilderness tourism commercial operators want to be able to accommodate more persons per campsite	– On a case by case basis, administrative approval can be provided in advance to allow this to happen.
11 (1). <i>Eligibility for seasonal overnight camping permit</i>	–The regulation needs to include non-resident eligibility for the seasonal permit. The definitions also need to define non-resident.	–Proposed regulation omitted the reference to “non-resident” in error; non-resident will be included in the final version; non-resident definition needed
25. <i>Quiet time</i>	<ul style="list-style-type: none"> –Some people preferred 10 rather than 11pm for the start of quiet time. Some felt that the operation of RV generators should be banned outright and failing that stop their use after 8pm. –Some specifically support the proposal to establish an overnight quiet time. –“We have had some of our camping outings ruined by loud 	–Excessive daytime and evening noise can be regulated through section 59 of the <i>Parks and Lands Certainty Act</i> which relates to public nuisance including the making of loud noises which disturbs users of a park. The 11:00 pm quiet time hour has been in place and generally accepted in the past by users and is comparable to other jurisdictions.

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	<p>all night parties.”</p> <ul style="list-style-type: none"> – “I think there also needs to be a rule to regulate noise during the day, especially loud music.” – “Some campers tend to impose their brand of music on everyone around them.” 	
<p>27. No entry to recreation site between 11 p.m. and 7 a.m.</p>	<ul style="list-style-type: none"> – Some were concerned that law abiding people would not be allowed to quietly walk into campground between 11pm and 7am – Some felt that regulation would restrict those not staying in campground who want to use boat launch for access to other areas during off hours 	<ul style="list-style-type: none"> – Park Officer discretion would be used so that if a person peacefully accesses a recreation site between 11 p.m. and 7 a.m. for reasons cited there will be no action taken.
<p>28. No entry of non-registered campers to campgrounds between 11 p.m. and 7 a.m.</p>	<ul style="list-style-type: none"> – Some questioned how this regulation would prevent unauthorized camping when other regulations require an overnight camping permit. – Others were concerned that the regulation would prohibit registered campers from re-entering the campground. – An indirectly related concern related to Europeans who need campsites after campgrounds close e.g. late September or early October – Certain specific campgrounds need to be kept open to accommodate snow machine or ATV access e.g. Pine and Dezadeash lakes where ice fishers are forced to use adjacent private property 	<ul style="list-style-type: none"> – Park Officer discretion would be used so that if a person peacefully accesses a recreation site between 11 p.m. and 7 a.m. for reasons cited there will be no action taken. – Concern re shoulder season campers: If the campground is “closed” but accessible, campers may stay with out requiring a permit or paying a fee; however, services such as fire wood will not be available
<p>33. loaded firearm ban</p>	<ul style="list-style-type: none"> – Some felt that bear protection is a concern especially in more remote campgrounds – Some indicated that individuals should be able to have their firearms stored in accordance with territorial and/or federal 	<ul style="list-style-type: none"> – This is similar to <i>Yukon Wildlife Act</i> where there is provision for no discharge of a firearm within 1 km of occupied dwelling – All but 5 campgrounds are 1 km² or less in size. For those 5 campgrounds between 1 and 6 km² Parks proposes to limit

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	laws.	<p>the restriction to a distance of 1 km from the developed area of the campground or by re-surveying the campground to the smaller area 1 km around the developed area of the campground.</p> <ul style="list-style-type: none"> - Can still carry a rifle with bullet in the magazine (i.e. not defined in Yukon law as loaded) for purpose of self defense against threatening bear. - Killing a bear in self-defense is a strict liability offense which may not lead to charges (i.e. with reasonable justification).
35. Unattended property at a campsite	<p>A variety of views were expressed:</p> <ul style="list-style-type: none"> - “We have arrived at campgrounds on numerous occasions (especially on Friday) to find that a camper has marked several campsites as "taken" in anticipation of friends arriving later. This practice is improper and unfairly prevents arriving campers from accessing usually the best sites in the campground. The regulations should confirm a "first come" policy. I'm not sure this is addressed in the current proposals.” - “We think that the 24hr unoccupied is somewhat short, but possibly 48hr would be a good compromise.” - “Prohibits people from leaving their belongings at a campsite for more than 24 hrs. If they have a valid permit, what is the problem? People routinely do this when they go on overnight trips and maintain their base camp in a campground” 	<ul style="list-style-type: none"> - This regulation refers to developed campsites only to prevent “reserving” such sites for an extended period of time and is not intended to refer to other areas within campground. This will prevent reserving popular campsites on busy weekends on the Wednesday or Thursday before.
37. Ban on ATV operation in campground	<p>This regulation generated the greatest number and variety of comments:</p> <ul style="list-style-type: none"> - “Limits law abiding ATV operators from using ATV’s in campgrounds” - “Will affect resident hunting in the fall.” 	<ul style="list-style-type: none"> - Propose to drop regulation and have Park Officers appointed under the Motor Vehicle Act to enforce ATV use on roads and trails (drivers’ license, registration and insurance requirements). Regulation would also include no off road ATV use in campgrounds in order to preserve natural resources.

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	<ul style="list-style-type: none"> - “Agree on banning ATVs which should include dirt bikes too.” - “ATV use in campgrounds has caused my wife and I considerable distress. The vast majority of ATV operation is by kids who have neither the skills nor the legal authority to drive a motor vehicle on a public road. The machines are brought to the campgrounds in most cases for the entertainment of kids, many of whom are well under 16 years. Besides the noise made by these machines there is a real safety threat to other campers including children should one of these machines go out of control, which in my view is only a matter of time.” 	
39 & 40. Restriction on overnight use or enclosing kitchen shelter with tarps	<ul style="list-style-type: none"> - Late season users object as the shelters are used during cold/wet weather. 	<ul style="list-style-type: none"> - Park officers will use discretion in the enforcement of this regulation in case of responsible shelter use.
44 (2). No posting signs	<ul style="list-style-type: none"> - Some felt... “this can be taken too literally and prohibit people from putting up signs directing guests to an event in a park.” 	<ul style="list-style-type: none"> - Park Officer will use discretion in the enforcement of this regulation in the case of responsible and necessary use of signs.
47. No introduction of non-native plants and animals	<ul style="list-style-type: none"> - One person indicated that... “This provision does not take into account that quite a few Yukon plant species are very rare and have a “spotty” distribution and need protection, so don’t just regulate against introduction of non-native plants (or animals)” 	<ul style="list-style-type: none"> - Provisions under other legislation provide the necessary protection endangered or threatened species.
48. Required leashing of domestic pets	<ul style="list-style-type: none"> - Some dog owners want their pets to have the freedom to roam and others including First Nations require loose dogs for bear safety. - Regulations “should state that owners should be in control of their animals at all times so that they cannot be left alone in the campground or at a campsite unattended and off the 	<ul style="list-style-type: none"> - Can be reasonably accommodated by requiring dogs to be leashed in campgrounds for reason of public safety and “under control” in other park areas including the backcountry.

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	<p>leash”</p> <p>– Yukon Kennel Club mandate is “responsible dog ownership” and accordingly support the regulations as drafted.</p>	
50. Dispose of excrement of domestic animals	<p>– Some indicated that... “Dogs excreting in our campsite have also been a source of annoyance and I support a requirement for them to be restrained.”</p>	<p>– This regulation is required for reasons off public health. This provision applies only to built public facilities not undeveloped parts of the campground.</p>
51 (1) a & b. No loose pets at swim areas or beach	<p>– Some dog owners want to their pets to have the freedom to swim freely in beach and other swimming areas.</p>	<p>– These are areas used generally by the public and for reasons of public health and safety dogs will have to swim elsewhere.</p>
52. Prohibitions and restrictions on domestic animals	<p>– Some felt that... “Part of the enjoyment of weekend camping is having the family dog along. Dogs like to play, swim and hike with people. With these regulations in place, we may as well leave our dogs in a kennel for the weekend. We need responsible behaviors, not totally restricted.”</p>	<p>– This regulation does not prevent responsible pet owners from bringing them to a park. If however they pose a public health or safety threat or a threat to park resource, this regulation allows for their prohibition or removal.</p>
54. Prevention of nuisance wildlife	<p>– Because animals are naturally attracted to humans through curiosity, it was suggested that “prevention of nuisance wildlife” is replaced by prevention of activities such as attracting wildlife into campgrounds through feeding or improper garbage disposal, to assure that wildlife is not getting addicted to this food source and becomes a nuisance.”</p>	<p>– The provision will be re-titled to read “ Prohibition to Feed or Attract Wildlife”</p>
55. No field dressing of wild game in campground/park facility	<p>– Some Renewable Resource Councils felt that hunters should be able to use campgrounds and hang their meat after the regular camping season has closed.”</p>	<p>– Propose change to the draft regulation to refer only to big game year round in developed park facilities including kitchen shelters, other facilities and the developed area within campgrounds.</p> <p>– Propose change to the draft regulation to no field dressing in</p>

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		campground or recreation park only in operating season. In the off season field dressing can occur outside of the developed area but clean-up would be required.
57. Restrictions on liquor	<ul style="list-style-type: none"> -No comments were received opposing this restriction -Many comments supporting restriction on liquor; several supporting control on “partying” and excessive consumption of alcohol. 	<ul style="list-style-type: none"> - No changes required
59. 72 hour limit on unattended vehicles and accommodation units without permit	<ul style="list-style-type: none"> -Some felt this regulation could be an issue for people parking at campgrounds and traveling elsewhere overnight such as at Aishihik Lake and Kusawa Campgrounds. 	<ul style="list-style-type: none"> - In this case, the definition of “accommodation unit” would be changed to exempt a tent because for reasons of public safety a tent should not be parked in a “designated parking area”
60. Permit required to land and take off an airplane in a park	<ul style="list-style-type: none"> -One pilot did not agree with the necessity of a permit to allow to land and take off from a lake within a park. 	<ul style="list-style-type: none"> - The specific issue of the landing of planes in parks will be addressed in the management planning process which will include extensive public and stakeholder consultations.
65. Protection of water resources (fish cleaning & dish washing)	<ul style="list-style-type: none"> -Some fishers did not feel this regulation was... “practical at most facilities as this is the only place where fish can be properly cleaned. If this is to be regulated, there should be cleaning sites designated and supplied.” -A number of Renewable Resource Councils did not agree...“with disallowing the washing of dishes in a watercourse within a park. This is the best way to keep a site clean of food and smells that would attract wildlife.” 	<ul style="list-style-type: none"> - Will recommend removing the sections which prohibit using soap and cleaning cooking and eating utensils in water bodies. -Move section 65 (1) (which prohibits bathing, laundry, washing vehicles and dishes and cleaning fish within 30m of a source of potable water or boat lunch) to the Campground and Recreation Park Section so that it applies specifically within campgrounds, rather than parks. To address anglers’ concern around cleaning fish, delete the reference to boat launches.
69 (2). No cutting standing dead trees in park	<ul style="list-style-type: none"> -Some Renewable Resource Councils....“believe that campers should be allowed to cut deadfall to use for firewood when necessary...” and that.... “ this would prohibit people in the backcountry from collecting fuel wood 	<ul style="list-style-type: none"> - Park Officer will use discretion in the enforcement of this regulation in the case of responsible and necessary use of standing dead wood for fires. - Modify 69 (2) : delete “or damage” and insert “...cut down

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	for fires...”	or remove any ...” for campgrounds
69(1) Control of the size of fires	– It was pointed out that fire has a three-dimensional shape, and that should be reflected in the dimension stipulated, saying “0.5 meters wide, long and high” or “a circle with a 0.5 meter diameter and 0.5 meter high.”	– This regulation will be adjusted to the Yukon Government campground fire ring diameter of 0.6m
72. Restoration of park	– Some felt that the regulation.... “leaves the impression that the regulation refers to visitor caused damage to park, such as cutting down trees, destroying campground tables, running a boat into the dock, or painting over campground signs. While those activities may occur on occasion, for the most, the definition in the proposal is appropriate. Restoration should be replaced by “maintaining the park’s ecological integrity for future generations to enjoy and preventing damage to the park’s facilities.”	– Issues related to addressing ecological integrity will be addressed in the park management planning process which will involve extensive public consultations
Seasonal campsite permit	– Many generally supported making available non-resident seasonal campsite permits – Many also felt the current resident seasonal campsite permit is good value, saying....“a yearly permit is worth double what we currently pay.”	– Regulation 11 provides for seasonal campsite permits for non-residents so no changes are required.
Commercial Park Use Permit	– Some operators indicated that.... “It is important that operators are able to incorporate fee increases into the pricing of their tour packages. Many tours are developed and marketed 12-18 months in advance.”	– The option exists for the progressive introduction of this fee to allow commercial operators to adjust their pricing.

General Comments

(specific individual comments)

Draft Regulation	Comment/Issue
<i>Length and detail of the draft regulations</i>	<p>– “Regulations are long and detailed. It is like an attempt to regulate common sense. Some are not practical, sensible and/or unenforceable or only partly so in certain circumstances. Honest law abiding citizens are criminalized and should and in some cases would feel guilty if they don’t follow all the rules – even the obviously unnecessary ones such as unleashed domestic pets. I hear that the officers won’t necessarily enforce the laws in all cases and will use their judgment.”</p>
<i>General sense of being safe in campgrounds</i>	<p>– “I camp in a SUV; I no longer feel comfortable pitching a tent, as it would be difficult to leave in a hurry. Bears are a concern, but human intruders in unsupervised campgrounds are the main reason. I realize the campgrounds can’t be easily staffed (horrific costs), but did want to draw this to your attention.”</p> <p>– “Pine Lake near Haines Junction is particularly problematic with partying youth on summer weekends and I will no longer camp there. The tent spots near the beach are too close to where the partying goes on and I’ve felt very uncomfortable there, as well as not able to sleep due to noise.”</p>
<i>Use of campgrounds and overnight camping fees</i>	<p>– “My use of YG campgrounds has decreased significantly for overnight use since the permit system went into effect, especially having to buy tickets in advance. I camp way more often in Skagway and Haines than in Yukon campgrounds, and the ease of paying for the camping, also lower costs, are factors.”</p> <p>– “Of course, as a Yukoner, I think we shouldn’t have to pay for camping at all, but I realize that’s not likely. And I do appreciate that we have a public campground system available to all.”</p>
<i>Noise levels in campgrounds and commercial operators</i>	<p>– “The proposals appear to address the main problems encountered by those who wish to have relative peace and quiet in these facilities.</p> <p>– “I would like to see better control of commercial operators who provide canoe guiding services out of the Takhini River Campground. I have seen them arrive at about 10:00 am Sunday morning and prepare for a trip down the River. In my experience the noise they make is inconsiderate of campers in the vicinity who may be trying to have a quiet breakfast. Also, I have seen them leave vehicles parked along the roadway in the campground making it difficult for a large RV to get in or out of a few of the campsites. They also occupy a camp site with parked vehicles. I hope the Regulation proposals have provisions to control this sort of activity to prevent annoyance to registered campers.”</p>
<i>Dissatisfaction with consultation process</i>	<p>– “I have many questions and uncertainty of the Proposed Regulations and recommend that a proper formal consultation</p>

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	process with maps of the various parks in question and open houses in Whitehorse and the various affected communities occur. I do not believe the consultation process that is currently in place has sufficiently met the obligations of your department for proper consultation to the first nation and non-first nation communities and individuals.”
<i>Proposed regulations address campground issues</i>	– “Pleased to see updated regulations...added regulations to deal with partying, leashing pets, pick up feces, out of swim areas, prohibition of ATV’s are good...but regulations need enforcement dedicated to enforce them”
<i>Timing of the enforcement of regulations</i>	– “I am in favor of the proposed regulations in general. I would suggest that some of your restrictive regulations be modified to reflect certain times of year. For instance, the restrictions on domestic animals using beaches could be modified to restrictions in place only during peak seasons - say from June 1st to August 30th. You could also consider allowing the hanging of game at campsites in the fall when the majority of campers using the campsites (at least at some campgrounds) are hunters. Otherwise, I think what you have proposed will go a long way to better management, use and respect for our parks and recreation sites.”
<i>Differentiate between regular and off season camping</i>	– “A differentiation between the regular camping season and the off-season would help acknowledge the rights of hunters and anglers under this proposed legislation”
<i>Some of the new regulations are excessive</i>	– “We have camped in the Yukon every year for the past 14 years, and on occasion have seen some abuse of regulations. They are rare though and the enforcement people are doing a great job. I do think however that some of the new proposals are excessive.”
<i>New Regulations will improve your stay in Yukon Parks</i>	– “I think the new regulations will go a long way in improving your stay in the Yukon Parks. There seems to be the idea that you can drive your ATV’s/dirt bikes wherever and when you feel like it with little concern of others. And for everyone who has been around for one of those weekend party times well it just speaks for itself. So bring it in as is. In the big picture it will work.”
<i>Partying and ATV Use problems</i>	– “The other point about no drinking on certain weekends. I think that would be hard to monitor. But I think something has to be done about those that are causing the problems, such as extensive noise and rowdiness and partying till wee hours although I am not sure that it is all associated with drinking. As for the 4 wheelers it is scary when you see a young kid flying around on one of those. It is too bad that it takes some to ruin it for others. We quite enjoy going camping and having a couple of drinks around the fire as well the kids enjoy going for the odd 4 wheeler ride with a sober adult on occasion. It will be a shame if we lose those privileges because of some other campers. I noticed last year it didn't seem to be as bad as past years. (for partiers and 4 wheelers) Having the Park Officers out and about was great.”

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<i>Too many campground rules</i>	<ul style="list-style-type: none"> – Some rules court absurdity! Letter to the Editor, Whitehorse Star, November 2, 2007 – “It is getting a bit ridiculous on the rules for campgrounds. I agree with the park officers (great), if there are students needing summer jobs. Not ex-RCMP officers who are on full pensions, taking work from people who actually need the work. Let’s count who they are! I agree with dogs on a leash outside the campsite, which I paid to use, by the way, and I’m a dog owner. – ATV use should be moderated. The vehicles should be taken away from the drunks and underage riders who speed through the campgrounds. It should not hinder responsible ATV owners docking their boats, picking up firewood or leaving for a hunting destination. – Let’s be reasonable here. We are out camping to enjoy what the Yukon has to offer ... and that includes RVs, generators, boats and 4x4 vehicles, and yes, even the odd one who has a kayak or tent. – Where is it going to stop? Boats leaving too early in the morning to go fishing? Water-skiers too close to shore? Where do you think the ATV riders will go while not in the campground? Nice new trails? – As for firewood, I’m not sure if I’m the only one, but when you stock the firewood bin once a week, you have to expect it to be gone within a week. And you can’t tell me you do it too much more than once a week. We spent the summer in approximately five campgrounds, and I had to fill the thing with wood I cut. More staff? You have the park officers coming to check if you have three pieces of wood, not 10 already. Why don't you have them stocking the campgrounds (eliminating the people who actually work out there), that way ensuring we see them more than once a week?”