**To all Members of City Council:**

Last Monday night (Dec. 6, 2021) administration was asked several questions concerning the Whitehorse South Trail Plan. One concerned the proposed non-motorized trails in Whitehorse South, and the fact that although they are called *non-motorized* trails, they will be open to snowmobile use in the winter should City Council adopt the plan as currently proposed.

Why are they open to motorized use in winter? This is because the Snowmobile Bylaw says, “A person may drive a snowmobile on a **motorized multiple use trail (MMU)** and **any other area of the City**that is not specifically excluded pursuant to section 15 of this bylaw.

The bylaw also says that operators must not “damage vegetation or ground . . .” This tells us that the city recognizes that such vehicles can cause damage to trails especially if operated on trails that are ***not designed*** to accommodate them. As to how an operator is to determine that vegetation and/or ground have been damaged prior to spring melt is not explained. Unfortunately, such use widens trails and then they become more susceptible to increased machine use in both summer and winter.

Administration suggests that it looked into the possibility of recommending changing the bylaw to address this situation, during the preparation of the 2020 Trail Plan, but as the engagement survey found that 92% of respondents were “generally” satisfied with their trail experiences, it decided not to pursue the issue.

This was the actual survey question: *On the whole, do you have satisfying experiences on the Whitehorse trail network?* When you ask a “motherhood” question you get a “motherhood” response. It seems obvious what the answer will be when asked such a question. What is interesting is that only 38% said they “always” had satisfying experiences.

Unfortunately, the survey did not address some fundamental questions with regard to snowmobile operation within the City of Whitehorse. Perhaps this is because “you don’t ask questions to which you may not like the answers.”

A survey conducted by DataPath Systems in 2011, as part of the public engagement concerning the development of a new Snowmobile Bylaw, found “58 per cent [of respondents wanted] greater enforcement [policies pertaining to] snowmobiles within the city; 73 per cent [believed] snowmobile use in ***residential neighbourhoods*** should be limited; 72 per cent [believed] there should be designated trails for snowmobile use throughout the city; and 59 per cent [believed it was] important to ***separate*** motorized and non-motorized trail use in Whitehorse.” (See https://www.whitehorsestar.com/News/residents-favour-more-snowmobile-rules-survey.)

The City has certainly ensured that there are ample designated and designed trails for snowmobile use. Look at the number and length of MMU trails in the City that are found on the much out-dated 2015 City MMU map. (Note: The MMU trails in one completed neighbourhood plan have yet to be added to the map, and it should be remembered that there are two more neighbourhood trails plan yet to be adopted.)

To those must be added all the so-called non-motorized trails not listed in the *Excluded* section of the Snowmobile Bylaw. Once this is done you will get some idea as to the extent of motorized trails in the City. And, one must not forget that the Snowmobile Bylaw also says that "a person may drive a snowmobile on a roadway when travelling from his or her residence to the nearest permitted area.”

Even though 73 respondents to the DataPath survey were concerned about snowmobile use in residential neighbourhoods, the City continued to ignore this concern by not ensuring that so-called non-motorized multiple use trails are free from machine use over the entire year. Now it is to be Whitehorse South’s turn to be further exposed to snowmobile use on community “so-called” non-motorized trails.

Last Monday administration said, “non-motorized trails support the out and away concept and [it had] observed this model to be working.” (See http://video.isilive.ca/whitehorse/2021-12-06.mp4.html.) Unfortunately, no explanation was given.

“Out and away" trails would have to be designed as MMU trails. And, we don’t have any identified “out and away” trails. I can only assume the “model” that administration has “observed” to be working, is the model that allows non-motorized trails to be motorized in winter. One wonders how administrators have carried out this “observation." No one questioned administration’s comments.

And, whatever happened to the plan to use “out and away” trails to get these vehicles out of residential areas and into the hinterland? These were referred to as “escape routes” in the former 2007 Trail Plan.

The current Official Community Plan says, “The 2007 Trail Plan recommends the creation of a map of “out and away” trails for motorized recreation vehicle usage. This map shall be designed to strongly discourage the use of all terrain vehicles on non-motorized trails and in environmentally sensitive areas. The map would be accompanied with physical upgrades such as signage. Work on this project shall be done in conjunction with groups such as the *Klondike Snowmobile Association*, Motor Vehicles Branch, and others.” (OCP 18.5.2)

We have been waiting for fourteen years to get a map of “out and away” trails. Now this is an “Action” item in the current 2020 Trail Plan, but when it comes to Whitehorse South, no “out and away” trails were identified for citizen comment during the draft plan process. Surely the City could have indicated on the draft trail map those trails in Whitehorse South currently under consideration for such distinction, so that residents could have provided comments on their potential effectiveness and possible negative impacts on homeowners.

The DataPath Systems survey also found that 59% of respondents believed it was important to separate motorized and non-motorized trail use in Whitehorse. The 2010 OCP had already recognized the desire of citizens to at least have some trails that are free from motorized use the entire year, as it says, “Where feasible, consideration shall be made to separate multi-use trails (which accommodate motorized and non-motorized recreation) from non-motorized trails.” (OCP 18.5.1)

And, the current 2020 Trail Plan’s ***new definition*** of a non-motorized multiple use trail, clearly indicates that the public expects such trails to be non-motorized. The definition does not say that such trails are to *accommodate snowmobiles in winter*. However, for all intents and purposes that is what the City will be saying to Whitehorse South residents if it does not include such trails in the Excluded Trails section of the Snowmobile Bylaw.

Administration was also asked about the proposed development in McIntyre Creek Park. I believe the reply was that any future development would “fall in line with other development policies.”

Again, no explanation was given as to what this might mean for the park. And, one such *development* policy is the Trail Development Policy under which some trail development would not require *any*public engagement. (See https://www.whitehorse.ca/home/showpublisheddocument/10076/636657131456170000 p.10)

In the first draft trail map the area was entitled, *Future Single-Track**Development Area*, which gave one the impression that it was intended as a mountain bike domain.

We do not know from where this proposal came, as to the best of our knowledge it was not discussed by the Whitehorse South Trail Task Force. (ATWA had an associate sitting on that task force.) The “development” suddenly appeared when public engagement commenced for the second time.

This proposal should be dropped from the draft Whitehorse South Trail plan. The integrity of Mt. McIntyre regional park could well be damaged by a haphazard approach to trail development, a point to which the 2014 Regional Park Plan alludes. If it is to be considered at all, then it should be in the context of a draft management plan for the existing McIntyre Creek Regional Park.

Keith Lay

Active Trails Whitehorse Association

www.activetwa.org