

Date: June 27, 2021

To: Heidi Redman

Cc: Landon Kulych, Meagan Wilson, and Mayor & Council

From: Keith Lay/Pat Milligan (Active Trails Whitehorse Association)

Re: Reply to your response to our fourteen questions concerning the Draft Whitehorse South Trail Plan.

1) As Per the City Snowmobile Bylaw: A person may drive a snowmobile on a motorized multiple use trail and any other area of the City that is not specifically excluded pursuant to section 15 of this bylaw. (Bylaw 2018-25 passed 2018-07-09) City Council at present has no intention to change the snowmobile bylaw, even after being presented with the idea by ATWA in the past.

Yes, it is true that City Council does not appear to want to change the Snowmobile Bylaw to reflect the new Trail Plan despite the City's pledge in the 2020 Trail Plan to "build upon and integrate existing policies, bylaws, management plans, memoranda of understanding and safety documents." (1.1 Purpose and Scope 1.1 #2)

However, it appears that it is *administration's* intent to allow motorized (snowmobile) use of any proposed so-called non-motorized in Whitehorse South despite the fact that when the draft plan comes before City Council it *could recommend* to councillors that these trails be placed in the *Excluded Trails* section of the Snowmobile Bylaw. Why is it not doing so?

Councillors could turn the recommendation down, but then the responsibility for such a decision would be on their shoulders, not on the shoulders of administration, which would be seen as doing what it can to uphold the intent of the 2020 Trail Plan: Non-motorized Multiple Use trails are "Trails to be used by a variety of non-motorized users."

As well, to send out a survey without telling citizens that the proposed non-motorized trails on the draft map are not really non-motorized, is simply unacceptable. Citizens will fill out a survey without having accurate information. Any results will be compromised. One would have thought that the Whistle Bend Perimeter Trail debacle would have taught the City a lesson.

Administration needs to change its position and indicate to the citizens of Whitehorse South that a mistake was made, and that when the draft trail plan comes before City Council it will ask that any proposed non-motorized trail be designated as such, and placed in the *Excluded Trails* section of the Snowmobile Bylaw.

2) Proposed new construction is in Whitehorse Copper and west of Canyon Crescent.

3) The intended purpose of the future single-track development area is walking, hiking, and biking. As this Area falls outside of Porter Creek, residents there have not been contacted.

Common courtesy would have suggested that a group (Friends of McIntyre Creek) that has long been working on trying to get a management plan for McIntyre Creek Regional Park would have been consulted about the possibility of single-track development in the area. The Porter Creek Community Association should also have been informed as it has a vested interest in this regional park.

The area of the park in question may fall outside of Porter Creek, but the park encompasses parts of that neighbourhood, and what goes on in any part of the park could well impact other park areas.

As the 2014 Regional Park Plan states, “Regional Parks do not operate in isolation from other lands and *neighbourhoods*. They have an intricate relationship with surrounding areas. Good decision-making will depend on science, our ability to identify linkages, and understand the broader inter-relationships and impacts.” (P. 15)

We asked whether or not this future single-track development was discussed by the Whitehorse South Trail Task Force, as our representative on the task force does not recall that it was. We would like to know the answer. If it was not discussed then how/why/by whom was this development proposed?

When the term single-track is used one immediately thinks of mountain biking. Trails designed for mountain biking are not necessarily built to fit the needs of walkers or runners.

4) If residents are opposed to suggested designations, they are welcome to comment in the survey.

The question was with regard to the Dawson South trail. One gets the impression that if the City does not like the responses it gets in previous consultations it just carries on until it does.

Unless residents are cognizant of what went on in previous consultations they will be unable to make informed comments on survey questions.

We hope that our previous comments concerning the Dawson South trail will be given the consideration they require.

5) People are welcome to suggest their ideas through this process, such as trails along the highway

Our previous submission made suggestions, which we hope will be considered.

6) Signage in Pineridge would have been incorrectly installed as no trails are designated in Whitehorse South.

The Pineridge proposed non-motorized trail is a long standing non-motorized trail (summer and winter). It has signage and barriers indicating that it is off-limits to snowmobiles and other ORVs. This *designation* came as a result of public consultation. However, for some reason the trail was never added to the *Excluded Trails* section of the Snowmobile Bylaw. Now, it appears that the City wants to open it to snowmobile use.

There is one trail located at the end of Dawson Road in Wolf Creek that has been formally designated motorized

There are two designated MMU trails in Wolf Creek, Dawson North and Harbottle. Dawson North is halfway down Dawson Road. The issue with the proposed Dawson South MMU trail is that the city said the Wolf Creek Community Association wanted it designated as a MMU trail when it *actually did not*. This trail traverses an ESA and receives the greatest non-motorized trail use within the Wolf Creek subdivision.

7) A bridge is not proposed. When building [a bridge] the City follows YESAB regulations

The draft trail plan map shows a continuous trail along the railway right of way over Wolf Creek, which suggests a bridge over Wolf Creek. Past administration members advised ATWA that even a snowmobile trail crossing at a creek would require a bridge. This seems to have been forgotten in the current draft.

8) This information was provided in the Backgrounder.

There was nothing in the PDF that we could see which explained why the trails were selected for designation, although there was reference to the work done by the trail task force group in developing recommendations on trail locations, designations, types of use and trail etiquette. Was there something called a *Backgrounder* that ATWA failed to receive?

9) The City has a regional Parks plan, which was adopted June 2014 by Council.

Yes, this is true. However, "The Regional Parks Plan is the first step towards park management planning by providing high-level direction. Future management planning will explore *park-specific elements*. Just as the OCP guides

neighbourhood planning, so too shall the Regional Parks Plan guide park management planning. Like the OCP, the Regional Parks Plan will provide broad direction for Regional Parks.” (P. 16 Regional Parks Plan)

We do not have a regional park management plan for the McIntyre Creek Park, and until we do, we should not be making proposals such as single-track development for the park. That is something that a management plan would consider as being appropriate or not appropriate.

10) Yes, we are consulting Kwanlin Dün.

Yes, but has Kwanlin Dun been told that the trail going through their settlement land is to be motorized in winter if the draft plan receives approval as presented?

11) Yes, the City has an agreement. Residents are welcome to suggest other rails to trails ideas through this process

12) The City is currently working on updating the MMU map, which includes those trails considered “out and away” trails

Surely the City can indicate the trails in Whitehorse South, which may be considered as “out and away” trails, so that residents could provide comments on their potential effectiveness.

All trails in Whitehorse South will be MMU trails as defined in the 2020 Trail Plan. In light of this fact, perhaps the City should produce a truly non-motorized (summer and winter) trail map instead of a MMU map, since outside of ski trails and the three listed *Excluded Trails* in the Snowmobile Bylaw, everything else will be open to motorized use.

13) A charrette was considered, but allowing all residents to comment and participate is inclusive of everyone. In previous models for Whitehorse South not all residents felt comfortable voicing their opinions. This doesn't mean the trail plan was ignored as it was considered, and is not ruled out for future planning processes.

We are glad that it was considered, but now there is only one neighbourhood trail plan left where the charrette idea could be used. This may be an opportunity wasted.

14) We consider safety in planning and designation.

Glad to hear that safety is considered. When you combine motorized use with non-motorized use there are a multitude of safety issues that must be considered. This is one of the reasons why such trails are the most expensive to build and maintain.

New question:

We have one additional question that has come up as a result of ATWA's presentation before City Council on June 22nd. We are not sure if the "Existing Motorized Multi-Use (MMU) Trails" mentioned under "Trail Designations" have already *been designated* as MMU trails, or if administration is saying that these are now *up for designation* as MMU trails. Clarification is needed.

Initially, we thought these trails had (at some time in the past) been designated as MMU trails, and we asked (in our presentation before council) that the public be informed as to how and when the designations had occurred.

However, an associate has mentioned that the map legend could be suggesting that the trails in question are being used at present as MMU trails, but have not been formally designated as such. As mentioned previously, clarification is needed as the validity of survey responses could be challenged.

Thank you for reviewing this document.

Keith Lay
Active Trails Whitehorse Association
www.activetwa.org
633-4936 (H)
687-8500 (M)