

**2020 Trail Plan  
Analysis  
(1/18/2021)**

The intent of this paper is to analyze whether or not the newly approved 2020 Trail Plan has addressed issues ATWA raised in two written submissions and in phone and Zoom interviews with consultants. An initial Draft Trail Plan was open to the public for review and comment. The Final (Trail) Plan was presented before Mayor and Council for its consideration on November 30, 2020. Whitehorse City Council adopted the 2020 Trail Plan on December 7, 2020.

ATWA's second written submission critiqued the first Draft Trail Plan.

There are a total of thirty *Action* items in this document. As the Trail Plan indicates "the recommendations (*Actions*) are not presented in order of priority, as many can happen concurrently."

We have not addressed all the thirty *Actions* mentioned in the Trail Plan, but only those that deal in some manner with concerns ATWA has raised in the past, or in which we have some direct interest.

**A)** The *Introduction* section of the approved plan mentions the *Benefits of Trails*. The first Draft Plan did not mention *mental health benefits*, and ATWA asked that the latter be added. It was added.

**B)** Under *Environmental Benefits* we asked that the section be modified in order to recognize that trails do not *just* promote "alternative modes of travel like walking and biking as opposed to driving," [but also alternative modes of *active* recreation.]

We suggested that if the City was truly serious about its *climate change emergency* declaration then it should be promoting active forms of *both* travel and recreation. Motorized (gas-powered) off-road vehicle (ATV/snowmobiles/dirt bike) recreation does nothing to promote environmental benefits. It does the exact opposite. Our suggestion *was not included* in the *Environmental Benefits* section.

**C)** In the first Draft Plan Under *Environment Benefits* a statement was made that, "Trails also provide opportunity for plants and vegetation that reduce [the] effects of climate change." We suggested that the comment needed explanation, as it was impossible to determine what was actually being said.

We went on to say that if not properly planned and constructed trails can have a detrimental impact on plants, animals, and ecosystems. Trails can lead to the importation of invasive plant species by all types of trail users. Flow trail construction can result in the cutting of large tracts of woodland. The building of trails and their subsequent use can displace animals due to the impact on their habitat and their avoidance of humans.

We believed what the first Draft Plan was trying to say was that if planned and constructed properly trails could have a positive impact on the surrounding environment.

In the Final Plan the reference to plants and vegetation and climate change was dropped.

**D)** We felt that in the Draft Plan the first paragraph under the title *Neighbourhood Trail Planning* was misleading. It suggested that neighbourhood trail plans are developed “with the direct involvement of residents.”

However, ATWA’s experience is that so-called *stakeholder groups* take the lead role in the development of these plans, and that resident input comes mainly at the end of the process where the latter comment on the trail plan that stakeholders have already developed. We suggested that this process needed to be revisited. We made similar comments in our first written submission.

The paragraph in question was dropped in the final document.

Action #22 of the approved Trail Plan says, “Instead of task forces, the City should consider a more inclusive public consultation process, that includes charrette style public workshops as part of the planning process, [and] early engagement with First Nations.”

We welcome this change in the trail planning process.

Please note that there are only two remaining neighbourhood trail plans to be completed, those being Whitehorse North and Whitehorse South. ATWA sits on both of the trail plan task force groups for these two areas, although it has been years since the Whitehorse North Trail Task Force group met. It is readily apparent that the process to develop a trail plan for Whitehorse North will have to start from scratch.

As for Whitehorse South, one can only wait for direction from Parks and Trails as to what is to be done with regard to this trail plan.

Action #22 of the approved Trail Plan calls for the completion of the “remaining neighbourhood level trail plans,” so there is hope that we will finally see these plans completed.

**E)** The Vision Statement in the Draft Plan read as follows:

“Whitehorse will have a diverse and accessible trail network valued as a primary community asset. A well-connected network of non-motorized and motorized trails will contribute to a liveable, attractive, sustainable and resilient northern

community. Residents and visitors will enjoy access to year-round recreational trails and active transportation routes that connect neighbourhoods and community amenities, contribute to community health and wellness, foster shared use and stewardship, and celebrate our unique natural and cultural heritage.”

We presented two alternatives to the above Vision Statement, but in our second interview with those preparing the Final Plan we indicated that our second alternative was our preferred choice. It reads as follows:

“Whitehorse will have a diverse, **[sustainable]**, and accessible trail network valued as a primary community asset. A well-connected network **[of trails]** will contribute to a liveable, attractive, sustainable and resilient northern community. Residents and visitors will enjoy access to year-round recreational trails and active transportation routes that connect neighbourhoods and community amenities, contribute to community health and wellness, foster shared use and stewardship, and celebrate our unique natural and cultural heritage.”

We argued for this alternative because it avoids mentioning the terms non-motorized and motorized altogether. Including these terms would automatically suggest that we have (or should have) an *equal balance* of motorized and non-motorized trails in the City.

Over the next ten years (the life of the 2020 Trail Plan) the public’s attitude with regard to this balance (or imbalance) may well change (if it has not already), which is another good reason to avoid mentioning the two terms in the Vision Statement.

ATWA argued that leaving out the reference to motorized trails in the Vision Statement would avoid having to support the claim made in the Draft Plan’s Vision Statement, that motorized trails contribute to a liveable, sustainable, and resilient northern community, which is certainly a questionable statement.

City councillors could hardly support such a statement being included in the Vision Statement in light of their climate change emergency declaration, *and* the City’s claim that it wants to promote *active forms* of recreation and transportation.

In addition, at present people think of motorized trail use as being mainly a gas-powered activity, but now we are seeing the introduction of all types of electric powered recreation devices, from bicycles to snowmobiles. Leaving the term *motorized* in the Vision Statement may cause confusion down the road, as in the future we may have to distinguish between electric and gas powered *motorized* activities.

We also argued that the word *sustainable* be added to the terms *diverse* and *accessible* when referring to our trail network in the Vision Statement.

The *approved* Trail Plan’s Vision Statement reads as follows:

“Whitehorse will have a diverse, sustainable and accessible trail network valued as a primary community asset. A well-connected, high quality network of trails will contribute to a livable, attractive, sustainable and resilient northern community.”

You will note that the word *sustainable* has been added, and that the reference to *non-motorized* and *motorized* trails has been dropped. The rather wordy last sentence of the draft plan Vision Statement has also been eliminated.

Our concerns with the draft plan Vision Statement have been addressed.

**F)** Under *Guiding Principles* it was good to find that our concern with regard to the use of the word *inclusiveness* has been resolved. One of the *Guiding Principles* in the 2007 Trail Plan was *Inclusiveness*. However, the term was often misinterpreted and, as a result, many seemed to think that the term meant that all trails should be open to all types of uses, when in fact that it meant that the public should be included “in determining guidelines for trail system development, use, reservation and maintenance.” See <https://www.whitehorse.ca/home/showdocument?id=246>. (p. 9)

ATWA had suggested that *Community Engagement* be used instead of *Inclusiveness* in order to eliminate the existing confusion.

This has been done.

**G)** We were hoping that one of the *Actions* listed in the Final Plan would have been a recommendation to amend the Snowmobile Bylaw to reflect the ATV Bylaw and prohibit snowmobile operators from using non-motorized trails, greenbelts, and open spaces.

This did not happen. However, due to changes to certain definitions found in the Final Plan’s *Glossary* there is cause for hope. (See Section H below.)

**H)** In the 2007 Trail Plan a Non-motorized Multiple Use Trail was defined as follows:

“Designated non-motorized trails and all others by default – officially (but not in practice) includes all trails not officially designated by the City of Whitehorse to allow use of motorized vehicles.”

Under the old Trail Plan non-motorized trails had to be officially designated by the City in order to be considered non-motorized in both summer and winter. All such trails are listed in the Snowmobile Bylaw under Schedule C and E.

As the above definition indicates, trails *not* officially designed and designated as Motorized Multiple Use Trails were also considered non-motorized *by default*, although *not in practice*.

The Snowmobile Bylaw says that 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.” (Section 15 includes Schedule C and E.) The result is that under the 2007 definition all default non-motorized multiple use trails were open to snowmobile use in the winter.

In the 2020 Draft Trail Plan the definition of a Non-Motorized Multiple Use Trail read as follows:

“Trails design[ed] and designated to be used by a range of non-motorized uses.”

Using the above definition as written would have meant that all non-motorized trails not officially designated as such, would not be considered non-motorized.

In other words, *default* trails were not mentioned in the 2020 Draft Plan definition, but were in the 2007 Trail Plan (p. 25). As well, the 2007 Trail Plan definition of the term did not include the word *designed*, so we wondered why this word was added. ATWA asked that the words *designed* and *designated* be removed.

We suggested that the definition of a Non-Motorized Multiple Use Trail be written as follows:

“A trail that is to be used only by a variety of non-motorized users.”

The approved 2020 Trail Plan now defines a Non-Motorized Multiple Use Trail as follows:

“Trails to be used by a variety of non-motorized users.”

You will note that as we suggested the words *designed*, and *designated* have been removed. The word *only* was correctly removed, as it is redundant.

ATWA believes that the new definition of a Non-Motorized Multiple Use Trail will make it easier to ensure their protection.

The new definition is very clear as to intent. It should mean that such trails no longer have to be formally designated by the City as being non-motorized summer and winter, as by definition they can *only* be used by non-motorized users. As well, by definition there are no longer any *default* non-motorized trails.

This suggests that any trail *not* “designed and designated by the City to be used by both non-motorized and motorized users including snowmobilers” is by definition off-limits to *any* kind of motorized use.

It also suggests that the City will no longer have to go through the time-consuming and costly procedure of first designating a trail as non-motorized (summer and

winter), and then making an amendment to the Snowmobile Bylaw in order to add the trail to its Section 15.

The definition of a Motorized Multiple Use Trail (MMU) has also changed under the approved 2020 Trail Plan. In the 2007 Trail Plan such trails were defined as follows:

“Includes only those trails formally designed and designated by the City of Whitehorse to allow the use of motorized vehicles, including 4-wheel drive vehicles, motorcycles, all terrain vehicles (ATVs) and snowmobiles.”

Under the approved 2020 Trail Plan the definition reads as follows:

“Trails designed and designated by the City to be used by both non-motorized and motorized users including snowmobiles.”

Since 2007 the City has always maintained that an MMU trail allowed for both motorized and non-motorized users, even though non-motorized users are not included in the 2007 definition. So the new Trail Plan is simply recognizing current use.

The term has been misused as to meaning for so long that to change it now might bring additional confusion, which is probably why this new definition has been adopted. Now at least, the definition matches the actual use.

It seems obvious to us that the Snowmobile Bylaw will have to be changed in order to respect the intent of the two new definitions. In other words, all trails not designed or designated as Motorized Multiple Use Trails, are to be off limits to motorized use in both summer and winter. Hopefully, open spaces, and greenbelts will be added to the restricted areas in the Snowmobile Bylaw as well.

Of course, what appears obvious to us may not be as obvious to the City.

One wonders how the City is going to get around the definition of a Non-motorized Multiple Use Trail when it comes to dealing with *motorized* electric vehicles. Action #25 of the approved Trail Plan indicates that “relevant policies and bylaws to legitimize the use of e-bikes and other e-mobility devices on trails” will be updated to allow their use. At present, City policies, bylaws, and plans suggest that such vehicles are only permitted on MMU trails and on City streets.

In adopting this new definition, the City appears to be saying that there is no longer any possibility of creating a trail that is to be used solely by motorized users, which would have been permitted under the 2007 Trail Plan’s definition of an MMU trail.

It is interesting that the definition that ATWA suggested be used for trails that included both motorized and non-motorized users was adopted.

**I)** Action #18 of the approved Trail Plan provides for the creation of “more accessible connections to access Grey Mountain trails within Chadburn Lake Park.” This *Action* was found in the Draft Plan as well. ATWA expressed some concerns with regard to what methods of construction would be used to make these connections.

We also wondered if the 2020 Trail Plan was the appropriate place to include such a request, as we already have a Chadburn Lake Regional Park Management Plan with its own set of goals, initiatives to achieve those goals, and timelines in place for each initiative to be completed. Those goals should not be usurped by Action #18 of the approved 2020 Trail Plan.

We suggested that Action #18 would be better addressed through the Trail Development Policy.

We were unable to get this *Action* amended in any manner.

**J)** In ATWA’s April 28, 2020 initial written comments concerning the update of the 2007 Trail Plan, we stated that the new trail plan should deal with the issue of e-bikes. We had gone before City Council on January 20, 2020 to express our concerns about the lack of information available both to the public and to dealers concerning the legal use of e-bikes and other electric mobility devices on City trails and streets.

Our research indicates that a review of current City policies and bylaws can only bring one to the conclusion that e-bike use is restricted to City streets and designated motorized trails. The City has not disputed our conclusion.

Action #25 of the approved Trail Plan reads as follows:

“Update relevant policies and bylaws to *legitimize* the use of e-bikes and other e-mobility devices on trails.”

ATWA appreciates the fact that the City is going to address the legality concerns we have raised associated with the use of these devices.

**K)** The approved Trail Plan claims that it will “build upon and integrate existing policies, bylaws, management plans, memoranda of understanding[s], and safety documents associated with City trails.”

ATWA has long argued that this should be done, and is glad to see that this is one of the key areas to be addressed in the new Trail Plan. (See p. 3 of the Plan under Purpose and Scope.)

**L)** Action #21 of the approved Trail Plan reads as follows:

“Continue to implement best management practices for trails in environmentally sensitive areas.”

Although we would question the inclusion of the words *continue to* in Action 21, as they imply that best management practices have always been used, we are glad to see the inclusion of some of the material ATWA provided on the subject.

As well, the recognition that the objectives and policies in the current Official Community Plan (OCP) must be adhered to when it comes to environmentally sensitive areas is welcomed.

**M)** Action #3 of the approved Trail Plan reads as follows:

“Update print and web-based trail maps.”

ATWA has long asked for a map of Great Trail/Trans Canada Trail routes found within the City. It has also asked for an updated and useful Motorized Trail Map. In addition, we expressed the need for *final* and *improved* Neighbourhood Trail Plan Maps on the City’s website, as well as a map of *out and away* motorized trails.

It seems that all our recommendations with regard to the Motorized Trail Map have been accepted. See Action #19, which in part reads as follows:

“Update the motorized trail use map (2015) to reflect completed Neighbourhood Trail Plans and improve legibility with a legend, north arrow, scale, trail names and labels. At the same time incorporate basic information related to seasonal trail use, and safe and respectful riding.”

We are glad to see the City has included both Action #3 and Action #19 in the new Trail Plan. As well, Action #4 calls for the implementation “of a trail mapping system.” This includes the provision of making available to the public (where possible) digital GIS files.

**N)** Action #19 in the approved Trail Plan calls for the “Support [of] *out and away* trails for motorized use.

We welcome the creation of a map of *out and away* trails as the 2010 OCP calls them, or *escape routes* as the 2007 Trail Plan labels them, and the placing of appropriate signage on such trails. As we indicated in our initial submission this was something that both the OCP and 2007 Trail Plan recommended, but which was never completed.

Mapping will be done “in conjunction with trail user groups.” This would suggest that all trail users are to be consulted in the creation of an *out and away* trail map.



For the most part *out and away* trails already exist as they were identified in the various completed City trail plans. They simply have to be properly identified on the City's (to be improved) motorized trail map. Once we have trail plans for Whitehorse North and Whitehorse South the *out and away* map could be fully completed.

**O)** Action #17 of the approved Trail Plan reads as follows:

“Support an upgrade of the Dirt n’ Soul Mountain Bike Park to support skills development.”

In our 2020 Draft Plan submission we wrote the following comments:

“Although this certainly is something that most people would support, it seems to be a *too specific* request to place in this Trail Plan. As well, it really has nothing directly to do with trails. It is a bike park.”

At the time we wrote this no one was aware of the cost associated with this upgrade, as the cost estimates for each of the *Actions* in the Draft Plan were not provided. In fact, they were not made available until the Final Plan went before Council on November 30, 2020. (Council approved that Plan on December 7.)

The lack of cost estimates for each of the *Actions* listed in the Draft Plan seems like a major oversight. How can one effectively critique the plan's stated *Actions* unless one knows the potential cost of those *Actions*?

If ATWA had known that the cost estimate for Action #17 was \$200,000, and that this was to be the most expensive Action of the Trail Plan, and one that accounted for 36% of the estimated cost of the 2020 Trail Plan, we would certainly have had far more to say about the subject in our 2020 Draft Trail Plan Response.

We did our best to make our concerns known to City Council in our presentation of December 7, but to no avail. You can find that presentation on our website. (See <https://www.activetwa.org/2007-trail-plan-rewrite.html>.)

**P)** Action #24 of the approved Trail Plan reads as follows:

“Update Definitions in the Trail Maintenance Policy.”

It then devotes this entire *Action* to *one* definition found in the policy, that being *single-track trails*. It goes on to say the following:

“Remove [the] reference to the exclusion of motorized use on *single-track* trails to be consistent with other policies and bylaws.” Considering the fact that ATWA had gone before City Council in January of 2020 to ask that the Snowmobile Bylaw be

changed to ensure agreement with the relatively new Trail Maintenance Policy as regards single-track trails, we had to laugh!

We did offer what we thought was a more reasonable use of Action #24 in our presentation before City Council on December 7. You can find that presentation on our website. (See <https://www.activetwa.org/2007-trail-plan-rewrite.html>.)

Our suggestion was rejected.

**Q)** ATWA is pleased to see the inclusion of Action #30 in the new Trail Plan. It reads as follows:

“Expand the trail stewardship concept by implementing programs such as Adopt- a-Trail.”

ATWA made a number of suggestions that would get citizens more directly involved in our trail network, and although we would have liked to see more of those suggestions adopted, we see this *Action* as a good start.

**R)** Action #11 of the approved Trail Plan reads as follows:

“Update and expand trail resources available on the City website.”

This is something that ATWA has requested for a number of years, and we are very pleased to see this is going to be done. Finally, one-stop shopping for all information related to trails in the City of Whitehorse.

**S)** In Section 5.1 of the Final Plan the statement is made that “The implementation plan should be reviewed annually to respond to changes, ensure integration with other City plans, and take advantage of potential funding and partnership opportunities.”

This is a most welcomed statement. Plans such as this one need to be reviewed each year for the reasons given above. An annual review also provides the public with an opportunity to see which of the plan’s *Actions* have been completed, and why others have not.

As mentioned in our 2020 Trail Plan Draft Response, a yearly update should be given on other City plans such as the Chadburn Lake Regional Park Management Plan, and the Schwatka Lake Area Plan.

**T)** Action #9 of the 2020 Trail Plan reads as follows:

“Consider a “trail code of conduct/etiquette” with trail etiquette and safety information.”

ATWA has long asked for such a code and has in the past provided the City with examples of trail etiquette guides, one of which is mentioned in the Final Plan, that being the *Bridge River Valley Trail Etiquette Guide*.

**U)** Action #8 of the approved plan reads as follows:

“Continue marking of existing trails with signposts and en route markers.”

We have on numerous occasions asked the City to correct signposts that have Latitude and Longitude reversed. As mentioned in our November/December *Updates* our last inquiry concerning this situation received the following reply:

“There are no plans for the immediate correction of this issue.”

This response confirms that the signs *are* in error, and suggests that it is quite possible new signposts will be going up with the same error, and that old signs will not be corrected.

The failure to correct the situation is mystifying.

We brought this issue to the attention of the consulting team, so perhaps the message got through to those responsible for trail signage.

**V)** Action #10 of the 2020 Trail Plan reads as follows:

“Utilize targeted public educational messaging around responsible trail use.”

ATWA appreciates the inclusion of this *Action*. There is much here for which we have been long advocating.

**W)** Action #16 of the 2020 Trail Plan reads as follows:

“Develop and market key trail loops of varying lengths and difficulty connecting to points of interest.”

This is in general a positive *Action*. In our written response to the Draft Trail Plan ATWA did mention a few items that should be considered when pursuing this *Action*. You can read those by reviewing that document. See <https://www.activetwa.org/2007-trail-plan-rewrite.html>. (Action #5)

**X)** The approved 2020 Trail Plan includes a Glossary of definitions. We have alluded to two of those previously: Non-motorized Multiple Use Trail and Motorized Multiple Use Trail.

We suggested the term *Passive Recreation* be placed in the Glossary. This term was used in the Draft Plan as well as in the Official Community Plan, but we have never

been able to get the City to define the term. There are various possibilities. It would be nice to know the City's definition. However, the definition was not included.

We also suggested the inclusion of the terms Single-Use Trail (motorized), and Single-Use Trail (non-motorized). However, the new definitions of a Non-Motorized Multiple Use Trail and that of a Motorized Multiple Use Trails suggest that such trails will not be permitted in the future. Neither of the terms was included in the Glossary.

Our suggestion that the definition of a Trail Steward found in the Trail Maintenance Policy be used in the 2020 Trail Plan was accepted.

**Final Comments:**

It is suggested that you have a good look at the Trail Plan's Appendix E: Cost Estimates. There are some major costs involved with this plan. However, we hope that the City will take the time to first address those *Actions* that do not require major expenditures. A number of these are ones that have been left undone for years, despite numerous attempts to get them implemented. Some were even mentioned in the previous 2007 Trail Plan.

The 2020 Trail Plan is supposed to be reviewed annually. It is up to citizens to take part in these annual reviews in order to ensure that the *Actions* in the plan are realized.

ATWA appreciates the opportunities we were given to make both written and oral presentations to the consulting team.

ATWA would like to thank all those individuals and organizations that took the time to be a part of the consultation process. We would also like to thank City staff and the consulting team for their efforts in the preparation of the 2020 Trail Plan.

We all have at least one thing in common: a great appreciation of our amazing trail network.

Active Trails Whitehorse Association