

**Date:** June 15, 2021

**To:** Heidi Redman (Lees & Associates)

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

Hi Heidi,

Thank you for the opportunity to comment on the Draft Whitehorse South Trail Plan (WSTP). We have several questions and comments concerning both the plan and the process involved in its development. We hope that Meagan Wilson and/or Landon Kulych to whom we are also sending copies will respond to some of our questions and comments, as you may not have the necessary background information to do so.

We are also sending this document to three members of City Council who live in Whitehorse South.

We will be asking our associates not to fill out the survey until we have received and distributed the response to our questions and comments.

Most likely ATWA will be making additional comments on the Draft WSTP prior to June 27 with particular reference to the survey.

### **Questions and Comments:**

**1.** There is no explanation on the Draft Whitehorse South Trail Plan Map as to what is meant by the term *non-motorized* trail. Most citizens will assume that *no* means *no* and that such trails will be free from ATV and snowmobile use the entire year.

However, we have a Snowmobile Bylaw that has yet to be changed to reflect the intent of the new 2020 Trail Plan, which has a *new* definition for the term non-motorized multiple use trail: "Trails to be used by a variety of non-motorized users."

Until the Snowmobile Bylaw is changed to reflect the intent of the new 2020 Trail Plan the confusion surrounding what is meant by a "non-motorized" trail will continue.

Is it the City's intention that trails on the Trail Plan Map that are proposed for designation as non-motorized are to be non-motorized year round, or will they be open to motorized use in winter? If the former, will those trails be added to the *Excluded Trails* section of the Snowmobile Bylaw?

If it is *not* the City's intent that such trails are to be off-limits to motorized (ATV and snowmobile) use the entire year, then citizens need to be informed, as *all* Whitehorse South Trails will actually be MMU trails according to the applicable definitions in the 2020 Trail Plan. If citizens are not informed survey results would be compromised.

2. The *only* proposed new Non-Motorized Trail Construction that we can see on the map appears to be in the Whitehorse Copper area. Is this the only one? We ask this only because we may have missed seeing others.

3. What is the intended use or uses of the area labelled “Future Singletrack Trail Development that seems to be within the McIntyre Creek Regional Park? Has the City contacted the Friends of McIntyre Creek Association or the Porter Creek Community Association about the possibility of this development?

Was this something that was discussed by the trail task force? Although it has been a long time since its last meeting, our representative on the task force does not recall the subject being mentioned.

There should be no additional trail development in the McIntyre Creek Regional Park until there is a management plan for the park. The park is in danger of being *trailed to death* as it is.

4. Why is the Dawson South trail under consideration again as a MMU trail?

All Wolf Creek residences were mailed two City surveys and offered an opportunity to choose between the Dawson North and Dawson South MMU trail options. Based upon 65 completed surveys, council approved the Dawson North MMU trail.

A principal objective of the City Survey was to choose a second MMU trail within the Wolf Creek subdivision from the two Dawson Road options for local use and connectivity: the Harbottle Road MMU trail was the longstanding existing MMU trail.

Why is a third MMU trail in Wolf Creek needed when there are already two approved MMU trails in the area, and heavily used MMU trails along the Alaska Highway that have not yet been officially designated?

The Dawson South trail is the most heavily used trail for non-motorized use within the Wolf Creek subdivision. It traverses an area Zoned as Environmental Protection located within the new Wolf Creek Regional Park. It also traverses a mature spruce forest with many exposed roots, which may be damaged by prolonged ORV use. This trail is located close to the Wolf Creek riparian area and there is a section that has no 30 m setback.

The proposed non-motorized trails adjacent to the Wolf Creek subdivision will likely not receive as much use as the Dawson south trail because of how far they are from the subdivision; this is another compelling reason to maintain a non-motorized designation for non-motorized trail users who use the Dawson South trail.

Delegates at the final Whitehorse South Task Force meeting were advised by City administration that the Wolf Creek Community Association asked that the Dawson

South trail be designated as a MMU trail. *This was not the case!* The WCCA indicated it did not support the Dawson South MMU trail both verbally *and* on the maps provided for delegates at the final Whitehorse South Task Force meeting.

A number of other delegates opposed the MMU designation in comments on the maps because of the ecological significance of the Wolf Creek. Delegates were told their map comments would be made available to those members of the public participating in the current trail planning process for Whitehorse South. However, it seems those comments have not been provided.

The Wolf Creek Community Association confirmed its position in the following email.

From: Ken Sylvestre <[ken.sylvestre@gmail.com](mailto:ken.sylvestre@gmail.com)>  
To: Patrick and Karen Milligan <[milligan.p.k@klondiker.com](mailto:milligan.p.k@klondiker.com)>  
Cc:  
Bcc:  
Date: Tue, 17 Sep 2019 17:23:30 -0700  
Subject: WCCA - May 15 meeting minutes

Following are the relevant points from May 15th minutes with regard to trails.

- Committee (taskforce) disbanded by City
- **Map showed erroneous designation for Dawson South - Duncan pointed out at City event**
- **WCCA position remains re South Dawson trail**

## **5. Alaska Highway:**

Why are there no trail designations along the Alaska Highway? Whitehorse South delegates strongly requested that the City pursue a safe biking trail off the highway through an MOU with GY Highways and Public Works; this trail could be designated as an MMU trail.

One delegate received conceptual support for the idea from Minister Streicker, but City administration indicated the Alaska Highway was GY land, and designating City trails along it would be a burden for bylaw enforcement. Alaska Highway trails designated by the City would greatly enhance trail connections and user access to trails.

## **6. Environment Protected Area adjacent to Pineridge subdivision:**

Why is the non-motorized trail within the EPA shown as a *proposed* non-motorized trail, when it's an existing trail with trailheads that have City signage indicating the trail is off limits to both ATVs and snowmobiles? As well, there are barriers in place to prevent such use.

**7. Bridge over Wolf Creek:** Based upon the proposed MMU trail along the WP&YR right-of-way is a bridge over Wolf Creek proposed? City administration advised the Wolf Creek Community Association that designated snowmobile or ATV trails that cross creeks require a bridge to address City environmental concerns, and bridge construction triggers a YESAB review.

Assuming a bridge is planned, please defer council approval of the Dawson South and WP&YR MMU trails until a YESAB review is completed. A YESAB review will independently address a number of concerns residents, First Nations, community associations and trail associations have tabled.

**8.** No reasons are given in the survey as to why any of the proposed motorized or non-motorized designations have been suggested. Similarly no reasons have been given as to why the new non-motorized trail construction has been proposed.

Surely if citizens are to make informed decisions about the value of all these proposals this information needs to be provided in the survey. This has not been done and now the value of the responses is questionable.

**9.** Some of the proposed trails are within City Regional Parks, which do not (as yet) have management plans. An explanation should be given as to why the City continues to allow this despite the concerns raised about how inappropriate this process is.

**10.** Has the Kwanlin Dun given its approval to a non-motorized trail going through its settlement land? Will this so-called non-motorized trail be open to snowmobile use in winter and, if so, has the Kwanlin Dun been made aware of this possibility?

**11.** Does the City have an agreement with White Pass to allow a motorized route alongside a section of its right-of way in Wolf Creek? If so, why not explore additional contemporary rail trail options, which could greatly enhance the Whitehorse South trail planning process?

**12.** The 2020 Trail Plan Action # 19 said that there would be “[improved] mapping of “out and away trails.” However, there are no labelled “out and away” trails on the Whitehorse South Trail Plan Map. This oversight needs to be corrected, as it is essential that these trails be identified in the trail plan for the area.

**13.** Action #22 of the 2020 Trail Plan says, “the City should consider a more inclusive public consultation process, that includes *charrette* style public workshops as part of the planning process.” It also says that these *charrettes* should “[build] on work done to date.”

As there are only two neighbourhood trail plans to complete (Whitehorse South and Whitehorse North), and both had trail task force bodies in place for some time, participants in these *charrettes* would have ample work upon which to build.

We believe it is prudent to incorporate charrettes in the Whitehorse South trail planning process because the area under consideration is very large, the trail map provided is difficult to read and provides little background information to survey participants as to the reasons for the designations and trail construction suggested, and the charrette process should result in an improved trail plan for Whitehorse South. As mentioned, the 2020 Trail Plan also recommended the use of charrettes as part of the planning process for the development of the remaining neighbourhood trail plans.

Why is the recommendation of the new Trail Plan being ignored? (Please note that current COVID restrictions allow organized gatherings of “up to 200 people with 2-metre (6-feet) physical distancing.”)

**14.** Any proposed MMU trail not only has to be designated by the City to actually become an official MMU trail, but it also has to be *designed* to accommodate both motorized and non-motorized users. The trail has to conform to the trail requirements of both user groups. Safety is a key issue.

ATWA would like to know what work will need to be done to ensure that all trails eventually designated MMU will meet those requirements. Citizens and members of City Council should be made aware of the fact that MMU trails are the most expensive trails to both design and maintain.

**15. Comment:** As we have a new 2020 Trail Plan with new definitions of a Non-Motorized Multiple Use trail, and a Motorized Multiple Use Trail it would have been prudent to provide those definitions at the beginning of the survey, so that citizens know what is actually meant by these terms.

We would most appreciate a response to our questions and comments.

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