



May 26th, 2020
CPAWS Yukon
506 Steele Street
Whitehorse, YT

Dear Whitehorse trail planners,

Thank you for the opportunity to provide comments on the City of Whitehorse's Trail Plan. The Canadian Parks and Wilderness Society, Yukon chapter (CPAWS Yukon) advocates for the territory's most valuable and priceless resource: our wilderness. Our mission is to conserve the land, water and wildlife of the Yukon for current and future generations. We want conservation to be a pillar in the Yukon so that our rich wildlife and diverse landscapes receive the protection they deserve.

We're fortunate to share the hills and lakes around Whitehorse with bears, beavers and migratory birds. Whitehorse is fully deserving of its title as *the Wilderness City*—but this also comes with the responsibility to carefully manage our relationship with wild spaces and wildlife. Our trail system is a focal point for these interactions.

The 2007 *City Trail Plan* gave little attention to wildlife and natural resources, but now is an excellent opportunity to strengthen Whitehorse's trail strategy. Protecting wildlife and ecosystems should be a foundation of Whitehorse's new Trail Plan. CPAWS Yukon is pleased to provide the following recommendations:

1. Restrict off-road vehicle (ORV) access in sensitive areas.

Wetland and alpine ecosystems are especially vulnerable to damage from off-road vehicles. The Trail Plan should ensure that ORV access is restricted to sensitive ecosystems. The Trail Plan must also promote education and enforcement to ensure that ORVs do not go off-trail, or use non-designated trails. Penalties should be sufficiently stiff to discourage infractions.

It is also important that the Trail Plan dovetails with upcoming territorial off-road vehicle regulations. The City of Whitehorse should nominate sensitive areas in the City's vicinity as ORV Management Areas to strengthen protections for these ecosystems.

2. Balance recreation with ecosystem protection.

The Trail Plan must strike a balance: providing opportunities for people to view wildlife and recreate while not overrunning ecosystems with traffic. The Trail Plan should prioritize the enhancements of trail networks between subdivisions and within the immediate vicinity of neighbourhoods, rather than extending trails into more intact ecosystems around the periphery of Whitehorse.

The City should work with local communities, researchers, Environment Yukon and Yukon First Nations to identify wildlife habitats and corridors (e.g. MacIntyre Creek) and ensure that trail networks within these areas do not exceed scientifically-established critical thresholds in these areas.

3. Promote responsible trail use.

The Trail Plan should promote education around ecologically-conscious trail use. Public education about responsible trail use could improve the experience of other trail users and decrease the level of maintenance required by the City. The education program could focus on teaching trail users about leave-no-trace principles¹. The program could include practices such as keeping dogs leashed in wetland areas to prevent them disturbing beavers or nesting waterfowl, and staying on-trail around sensitive plant communities. Trail users should also learn about: the importance of not littering along trails, including picking up and disposing of pet waste; and responsible harvesting of plants or plant parts (i.e., berries, leaves and flowers) so the plant community remains unharmed and unaltered. A list of permits required for commercial harvesting (e.g. morels) would be helpful. Where necessary, the City of Whitehorse should enforce fines for behaviours such as littering or harassment of wildlife through an observer-report system.

4. Minimize footprints of trails.

The City of Whitehorse should ensure trails have minimal environmental impact. This should include avoiding sensitive ecosystems, building boardwalks over fragile areas such as wetlands, and installing erosion control measures (e.g., matting in easily eroded areas, similar to what is used on high-traffic trails in Tombstone Territorial Park). The

Trail Plan should promote the upgrades of existing trails over the construction of new ones through intact habitats.

5. Collaborate with Yukon First Nations to identify and protect areas of cultural importance.

The City of Whitehorse should work with First Nation governments to minimize the impact of trail users on hunting and gathering practices. This could include seasonal closures on trails within important First Nations hunting areas. Any harvesting that doesn't fall under personal use or subsistence harvesting could require a collection permit (e.g., commercial harvest of morel mushrooms²).

Finally, the City of Whitehorse should work with First Nations Governments and Yukon Government to identify and protect Heritage and Archaeological Sites. Many cultural features and historic sites are located throughout the Whitehorse area³, and more may be identified through collaboration with knowledge holders.

Sincerely,

Malkolm Boothroyd, Campaigns Coordinator

Maegan McCaw, Conservation Intern

Dr. Katarzyna Nowak, Conservation Science Coordinator

¹ Leave no Trace Canada Outdoor Ethics. (2009). Retrieved from <https://www.leavenotrace.ca/home>

² Government of Yukon. (2020). Get a permit to commercially harvest morel mushrooms. Retrieved from <https://yukon.ca/en/doing-business/get-permit-commercially-harvest-morel-mushrooms>

³ Government of Yukon. (2020). GeoYukon. Retrieved from <https://mapservices.gov.yk.ca/GeoYukon/>