



July 6, 2023

Re: Decision to procure planning services for Holly Street Residential Master Plan

Dear Mayor Cabott and Councillors Boyd, Cameron, Curteanu, Friesen, Laking, and Murray,

The Canadian Parks and Wilderness Society, Yukon Chapter (CPAWS Yukon) advocates for the territory's most valuable and priceless resource: our abundant wilderness. We work with First Nations and all levels of government, local organizations, businesses and citizens to ensure the natural wealth we enjoy today is available for future generations. We are based on the traditional territories of Kwanlin Dün First Nation and Ta'an Kwäch'än Council in Whitehorse.

We are writing in support of Whitehorse City Council procuring planning services for the Holly Street Residential Area Master Plan, so long as the future neighbourhood supports high-density housing. At a neighbourhood scale, we feel that the provision of compact housing in the Holly Residential Area would outweigh the resulting modest loss of habitat and recreational space. At a broader scale, densifying Whitehorse's existing neighbourhoods in appropriate areas is far less ecologically and financially costly than developing new neighbourhoods to meet the city's housing demand.

Based on the August 2021 report *Accommodating Future Residential Demand in Whitehorse* by the City of Whitehorse Planning and Sustainability Services, our understanding is that Whitehorse will need to accommodate approximately 1,900 dwelling units between now and 2040. We agree with the recommendation in the report to focus appropriate infill within the urban containment boundary to avoid sprawl and preserve the wilderness areas that surround the city.

CPAWS Yukon staff visited the proposed Holly Residential Area in July 2023. The site is a healthy mixed spruce/pine forest with a diverse understory. Edges along pathways and the Trans-Canada Trail are more recently disturbed and are a mix of willow-shrub, aspen and balsam poplar. Situated between Holly Street and a powerline right-of-way, and crisscrossed by walking trails, the site is somewhat fragmented. While it is never an easy decision to disturb or remove healthy and well-loved natural areas, due to the size and location of the proposed development, and the need for more housing, we are supportive of future high-density housing in the area.

To be clear, we are not supportive of converting the 6.25 hectare green space to housing if the development pattern will mirror the very low density housing on the other side of Holly Street. At that point we do not believe the trade-off between the loss of greenspace and provision of large lots would be worth it.



Our general support for the project is also made possible due to the large area of the Hidden Lake greenspace that would not be developed and remain as habitat and recreational space. While CPAWS Yukon was and remains staunchly opposed to the past Porter Creek D development proposal, we feel that the Holly Residential Area differs significantly from that development. The Porter Creek D proposal would have cut through the heart of Whitehorse's major wildlife corridor, while this proposal adjoins an existing street, is smaller in size, and will have a lower ecological impact.

Thank you for the opportunity to provide comments.

Sincerely,

Randi Newton, CPAWS Yukon Conservation Manager
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