

Date: October 12, 2015

To: Community and Protective Services Committee

Re: **Trail Planning at Westminster Ponds Environmentally Significant Area.**

I am writing to provide comments on the report from Environmental and Parks Planning, which recommends a bicycle path through a portion of the Westminster Ponds-Pond Mills Environmentally Significant Area.

First, I must acknowledge the overall good work for protection and management of Environmentally Significant Areas that is carried out by Environmental and Parks Planning. In the case of this proposed bicycle path, however, I find myself in disagreement with the recommendation from that department.

On a voluntary basis, I have worked to protect the Westminster Ponds-Pond Mills area for the past 45 years. In addition, I have joined with others in the effort to safeguard other Environmentally Significant Areas in the city and beyond. My professional career consisted of 35 years of experience in the field of environmental planning.

I was very active as a volunteer in the preparation of the *Planning and Design Standards for Trails in Environmentally Significant Areas* (referenced hereafter as *Trail Standards*). (The *Trail Standards* were adopted by City Council in 2012.) I am a member of the Trails Advisory Group (TAG), but I was unable to attend the TAG site visit of September 10, 2015. Recently, I have taken the opportunity to review the minutes of that site visit, and to reflect on how the *Trail Standards* have been applied in the case of this proposed bicycle path.

In considering the current report from Environmental and Parks Planning, it is essential to focus on the fact that Westminster Ponds-Pond Mills Environmentally Significant Area is exactly that – an Environmentally Significant Area (ESA). The *Trail Standards* document makes it clear that in an ESA, the ecological integrity and ecosystem health of the ESA shall have priority.

Decision-making for the Westminster Ponds-Pond Mills is enhanced by the information contained in the recent publication *Westminster Ponds/Pond Mills ESA: Ecological Inventory & Management Zone Report (April 2015)*, prepared for the City of London by North-South Environmental Inc. The consultant report determined that the meadow portion of the ESA has important values as natural habitat within the ESA, and assigned zoning of Nature Reserve and Natural Area 1 to this meadow. Birds such as Eastern Meadowlark and Bobolink, both protected under Ontario's Endangered Species Act, nest in this meadow.

Bicycle paths are not permitted within an ESA, and especially not within the most highly protected zones (Nature Reserve or a Natural Area Zone 1) of an ESA. City staff has put forward a rationale for a bicycle path through this meadow. I disagree with the rationale for the following reasons:

- the *Trail Standards* state that a Utility Overlay is to be managed in a manner consistent with the underlying and/or adjacent Management Zones
- In this case, the underlying/adjacent zone is Natural Area Zone 1
- the only type of trail permitted in Natural Area Zone 1 is a Level 1 Hiking Trail
- Bicycles are not permitted on a Level 1 Hiking Trail
- The Level 2 Trail proposed here, with its wider footprint, is not permitted in a Natural Area Zone 1
- The utility corridor in this meadow area has been managed in a manner consistent with the rest of the meadow and cannot, therefore, be considered an area of reduced impact (this, in contrast to more highly managed utility corridors in some other ESAs)

- in an ESA, the ecological integrity and ecosystem health of the ESA shall have priority in decision-making
- Bicycles are not compatible with protection of ecological integrity in an ESA; for example, snakes are known to bask on pathways, where they are injured or killed by bicycles

I urge Community and Protective Services Committee (CPSS) to reject the bicycle path proposed at Westminster Ponds-Pond Mills ESA, as this bicycle path is not consistent with the *Trail Standards*. To approve this path would risk creating a precedent for future decision-making in any city-owned ESA, leading to a diminishment of protection for all ESAs.

Yours truly,

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