

**Compiled Comments by EEPAC Working Group
Conservation Master Plan Phase II Draft
for the southern portion of the Medway Valley Heritage Forest ESA**

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I. Summary and Key Recommendations

The Medway Valley Heritage Forest ESA (South)(MVHF) Conservation Master Plan (CMP) shows that this ESA is unique in London, housing some of the city's oldest forests and highest concentrations of SARs. Therefore, EEPAC's position is that the CMP must focus on efforts to protect this unique urban ecosystem, and that increasing recreation and access is in conflict with this goal. In order to protect this valuable asset EEPAC makes the following key recommendations:

1) The CMP should continue with **restoration** efforts, and increase efforts to accurately assess the success of these efforts.

2) **Naturalization** efforts are likely to lead to increased ecological integrity. The CMP should ensure that trail plans will promote the success of naturalization efforts.

3) Increased resources are essential to ensure an accurate and quantitative **monitoring** program, which is essential for successful management of the cities ESAs.

4) **Trail management** plans are at odds with the rest of the CMP in that they favor trail connectivity over ecosystem protection. The three options proposed are: 1) "Enhanced As-Is", which includes altering trails that are presently level 1 and almost non-existent to level 2 (hardened surface). These trails are located on both the north and south side of Medway Creek and lead to the spot of the bridge proposed in option 2; 2) "Partial Connectivity", which is the same as 1) except with the bridge (at A) built, and 3) "Establishing enhanced connectivity", which includes a second bridge (at D) crossing. Although option 1 does not include a bridge, paving trails to a potential bridge connection implies a bridge at some point. **EEPAC is strongly opposed to the additions of bridges**, which will increase traffic to the north and south side of Medway Creek and increase risks to this ecosystem. Bridges favor connectivity and recreation over ecosystem protection and are at odds with the city's **Guidelines for Management Zones and Trails in Environmentally Significant Areas**.

5) EEPAC supports increasing **community engagement** and education, however these plans should be further developed in the CMP.

6) If the city values **public participation**, then requests for public input should be motivated by a genuine interest and need for public opinion and with transparency.

Accurately collecting public opinion data and using clear language to describe options at future meetings is recommended. EEPAC recommends more transparency in future public meetings by using option names that more clearly reflect what each trail option plans entail. One option should be “As Is”, which would be status quo and provides a baseline for comparison to other options.

7) EEPAC recommends that the Conservation Master Plan not be adopted until the implementation plan is submitted as part of the next 4 year budget cycle. EEPAC requests to be included as part of the Local Implementation Committee.

8) Further editing and additions to the CMP are required. As point of note regarding the Master Plan’s structure, a cyclical problem occurs in section 4.4. Sections 4.3.1; 4.3.2 and 4.3.3 all make reference to further discussion in section 4.4 but upon reading section 4.4, it just refers back to the sections just mentioned. Therefore, section 4.4 should be scrapped or else greater clarification regarding “Analysis of Proposed Trail Recommendations” is required.

II. Introduction:

At the group meeting on September 6, it was decided that we would formulate our comments based on some of the subject headings in the report, specifically naturalization, restoration, monitoring, trail management, and community engagement. To provide a general summary of our findings, we are pleased with the City’s efforts at restoration and have good expectations for increased community engagement associated with the ESA. However, we find that there are some oversights in regards to naturalization of certain areas and the City’s plans for monitoring the impacts of current and future policies and plans. Our greatest concerns centre on the proposed changes to trails and trail management.

III. Restoration

The ESA Master Plan identifies fifteen areas for restoration, with a strong focus on tackling invasive species and planting native species. Some of the areas have already been addressed. We believe the City is doing a good job at restoration and find this is in keeping with the desires of local citizens. Our one concern, however, regards measuring the success of restoration efforts. What are the metrics used to determine success? Are these metrics quantifiable, or do they rely more heavily on subjective observation? These issues will be looked at more in depth in the monitoring section below.

IV. Naturalization

Four sites adjacent to the MVHF ESA have been designated as areas for naturalization. In general, the Working Group is in favour of naturalization efforts, but we believe that in order for this work to be successful, it must be done concurrently with trail closures.

It was noted that one of the areas slated for naturalization – NA5 – the plan involves the establishment of a level two trail. So while expanding plantings of native plants is a positive development, paving a section could be counterproductive to the naturalization process as it will naturally create a boundary and habitat fragmentation.

In the area surrounding the Museum of Archaeology, it was noted that efforts at naturalization and the creation of a level 2 trail, must still address the informal trails around the Museum. A very serious problem of informal trails around the museum currently exists as visitors to the museum walk enter the woods from the east side of the parking lot to access managed trails. This problem could be exacerbated should a bridge be installed at Location A. It was noted that the sumac in the area is heavily trampled due to the existing informal trails around the Museum. The current version of the Master Plan contains no recommendations to close the informal trails in that area.

In NA4, the Master Plan calls for a trail, which is currently closed, to be reopened in conjunction with naturalization. The trail is along a very steep area of the ESA. When it was closed, informal trails popped up, leading to the area becoming badly trampled and compacted. The City plans on working with the landowners on the naturalization process. It is our recommendation that if the closed trail is to be reopened, the informal trails at the foot of the hill must be closed at the same time, and it must be more than a simple sign. Something must be put in place to make the informal trails less attractive or else efforts at naturalization will fail. Indeed, EEPAC would like to make the long standing recommendation that firstly, it be included in decisions regarding trail closures and secondly, that the City do a better job of closing trails through both signage that includes more information on the reason for trail closures to secure the support of visitors (as well as timelines on the projects at hand) and through plantings or other means to make informal trails less appealing.

V. Monitoring

The Working Group finds the call for ongoing monitoring and adaptive management laudable however, we find some areas for concern. Firstly, as was mentioned in section II, we would like to know by which metrics the City will determine whether restoration and/or naturalization efforts are successful, and by which means/metrics the City will determine that trail closures, trail openings and/or the installment of connectors (such as bridges) have had a positive or negative impact on the ESA, its species and its ecological functions. Table 13 provides a monitoring framework; but to date, nothing has been put into place for the trails that do exist. As part of monitoring we would ask for an annual report on bank migration, trail condition and usage, and how changes in condition are managed.

Secondly, we have concerns that the ESA management team has been assigned too much responsibility for monitoring the health of not only this ESA, but all the others in the City. With a staff of only three, it is nearly impossible for the team to undertake

robust monitoring to determine the effects of changes taken under the Master Plan, and to ensure that restoration, naturalization and the identification and removal of invasive species are done adequately. The Master Plan seems to propose a solution to the understaffing of the ESA management team, and that is to rely on volunteers who will alert the City of any encroachment by invasive species, which will then be removed through community projects. However, we find a significant flaw with this plan. If the ESA management team is unable to adequately monitor all areas of the vast expansive of the City's ESAs, and that includes areas slated for naturalization and areas closed to visitors due to their highly sensitive nature (i.e. presence of endangered or threatened species), how can they note the appearance of invasive species in a timely fashion? The City hopes that visitors will alert the City to the presence of invasives, but that pre-supposes that visitors are walking through closed areas. Given the significance of the ESAs, the City should not rely on volunteers for a key part of their monitoring, and instead needs to provide the necessary resources and trained personnel to monitor the implications of this Master Plan. Only trained professionals should have permission to enter highly sensitive areas to engage in early detection efforts against invasives. The same is true for section 5.2.2.1, additional trained professionals, not simply the understaffed ESA management team, should be involved in the monitoring of "the condition and vigour of individual species".

Finally, who will be in charge of coordinating all the efforts under section 5.1? This work requires someone with the resources and knowledge to manage all the incoming information, to compile that information and then to disseminate that information to all the people doing work within the ESA. This is an extremely large undertaking, which would require a dedicated position to accomplish it satisfactorily.

VI. Trail Management

To begin our comments on the proposed plans for trails in the MVHF ESA, we would like to draw attention to some general issues.

1. Under section 1.2.2 and elsewhere through the Master Plan, it is stated that the primary objection is to guarantee the ecological integrity and ecosystem health of the ESA. It likewise states that the trail system shall be implemented "to achieve the primary objective of protection and the secondary objective of providing suitable recreational and educational opportunities." Moreover, the **Guidelines for Management Zones and Trails in Environmentally Significant Areas** also places as top priority the preservation of the ecological features and functions which make an area an ESA. We would like to know if and how the three policy options as stated will achieve this main goal. We cannot support the current plans as it is our belief that they violate the central goal stated in this report and the **Guidelines**.

2. The CMP does not provide a clear delineation between the three options: "Enhancing the trail system 'As-is'", "Establishing partial connectivity" and "Establishing enhanced

connectivity of the MVHF ESA". More accurate names for each option, and greater clarification of the differences between the three options is required.

We take issue with the names, which can be confusing both to the readers of the plan and to the general public when the City is requesting in-put on the Master Plan. You will note the similarity in the names and the shortened versions "Enhanced 'As-Is", "Partial Connectivity" and "Enhanced Connectivity". It is our belief that the three policy titles should be significantly different for ease of understanding, i.e. "As-Is" (enhanced is purposely omitted, and that issue will be discussed below), "Trail improvement or upgrading" and finally "Enhanced Connectivity".

3. Both the presentation we were shown as well as the Master Plan document are biased in favour of "Enhanced Connectivity". If this is the plan that the City plans to adopt, this needs to be clear, both to EEPAC and in public consultations, rather than feigning that all three policy options are being given equal weight.

4. EEPAC would like to know if an assessment has yet been undertaken on informal trails in the ESA, particularly those in sensitive areas or those on steep slopes. If such an assessment has not occurred, what is the timeline for the assessment to be undertaken? Although the Addendum to the Natural Heritage Inventory speaks to this, EEPAC is skeptical as there is no good baseline date to compare to in order to come to the conclusions in the Addendum.

5. Additionally, does the City plan on closing all the informal trails, and if so, what is the timeline for those closures? Members of EEPAC note that there are informal trails not shown on the maps – why? For instance, there is a well-used trail connecting NA5 to the habitat for Special Concern Species (Green Dragon).

Also critical to any trail management is improvement of signage. Current signage is inadequate and hard to read. In addition to the AODA standards we recommend a trail name, map drawn over an air photo, a description of the trail and interesting points. This becomes an opportunity to educate rather than just tell users what they cannot do in an ESA. Signage must be correct and factual.

6. Regarding the document itself and the figures it contains, we recommend that it be made clear on Figure 3, Figure 4 and Figure 5 whether or not it includes the closing of trails. While it is mentioned in a footnote that is so small as to be nearly illegible, it also should be clear the text. We also believe that the informal trails be demarcated on ALL three figures (Figure 3, 4 and 5) to make it clear to everyone involved all the changes that will be made. It is not user friendly to have to refer back to Figure 3 to understand the changes in Figure 5.

7. Access 13 is not included in the figures regarding trail enhancements. This area involves a steep slope and while there is discussion regarding including stairs, this

change is not highlighted on any of the maps as a trail change. It appears that the sewer line has become the most used way into the ESA.

8. Finally, we have noted a strong reliance on an older article by Leung and Marion (2000) rather than referencing the more recent article by Marion (2016) that contains findings and theories based on new research. For instance, The Guidelines for Management Zones and Trails in ESAs (2016) states on page 12, "Research on natural area trail impacts has demonstrated that a properly managed trail system will limit the areal extent and severity of recreation impacts by concentrating traffic on resistant trail surfaces and through the use of appropriate structures such as bridges, fences, and boardwalks (Leung & Marion 2000)." This point is being used to justify the Level 2 trail from Access Point 10. It should be noted that methods other than trail hardening can be employed to manage user impacts (Marion 2016). More importantly, though, at this time no serious user impacts exist on the Level 1 trail south to the proposed A crossing, nor from Access point 10 to the creek. As Marion (2016) points out, "limiting use within the low-use zone, where impacts occur rapidly, can lead to substantial reductions in vegetation and soil impact" (p.343). Should the City add a Level 2 trail in those spots and encourage increased visitor use (around 20,000 users as mentioned at the last LAC as the number of visitors using the paved path north of Fanshawe), user impacts are bound to increase. In other words, if that area were left it alone (a true "as-is" scenario) the City would not need to change how it manages user impacts. It is only because the City is seeing to increase use that a Level 2 trail will be needed.

Specific Comments on Individual Trail Options:

Below we will give our critiques of each individual policy plan and our recommendations for improvement.

Enhancing the Trail System "As-Is": This is not a true "business as usual" option as would be standard in any policy memo. Once recommendations are made to "enhance" the system, it is no longer "as-is". One could assume that each of the three options are then "enhancing the trail system as-is" because that is exactly what is happening. Therefore, the first option should simply be analyzing the potential outcomes of not making any changes to the trails as they currently stand. This provides a baseline for comparison of the other options.

That point aside, however, and simply analyzing the plan put before us, we would like to know how the trail systems will be improved. How will the Level 1 trails be enhanced? Will there be boardwalks for instance? Clarification is necessary to accurately review the document.

From Access point 10, Figure 3, Figure 4, Figure 5, Figure 5a and Figure 5b all show a Level 2 trail. Site visits by the Working Group, however, have shown that not only is there not a Level 2 trail already in existence, but there is currently hardly any trail to speak of. Therefore, should not on all those figures, but especially Figure 3, the trail

demarcated as Level 2 from A10 to point A be shown as “Improved Trail Surface”? In addition, paving a trail does not fall under an “as-is” scenario. Due to the fact that there is hardly a trail there, we do not see that the “improved trail surface” to Level 2 is solving any problems due to visitor misuse or trampling, and believe that this move is purely for recreational purposes. It cannot be justified for ecological reasons and therefore is contrary to the primary stated goal of the Master Plan and the Guidelines for Trail Management. Furthermore, these Level 2 trails will increase habitat fragmentation, not only with the path itself at 1.5-2 metres wide, also in the immediate vicinity of the path, increasing the potential for harm to sensitive species and the introduction of invasive species.

We suspect, also, that with the access from A5 to Point A and from A10 to Point A being paved, it is inevitable that a bridge will be constructed at Point A. For that reason, again, the suggestion of paving both the east and west of Point A under “as-is” is disingenuous; the ESA will not stay in its same form. **We do not recommend a Level 2 trail on the east side of the river from A10.**

In regards to wording of the text, there is a serious error on p. 33 where the sentence reads, “As overviewed in the Addendum, *significant ecological features* in the MVHF ESA (south) were determined to be *compatible with existing managed trails*.” Those two phrases should be reversed to read that the *trails* were determined to be compatible with the *significant ecological features*, as the primary goal is to ensure the ecological integrity of the ESA.

We are in favour of the stepping stones to be placed at Snake Creek, as long as they are concurrent with efforts towards naturalization and stopping off trail activity.

Establishing Partial Connectivity. We have little comments on this policy option beyond what was already said for the “as-is” option because there is only one difference between the two scenarios. It is our belief that this option could be combined with the “as-is” option as it stands and then, as previously mentioned, have the policy option of no changes at all. At the moment there seems little reason to have three separate policy options as they are currently written.

Establishing enhanced connectivity of the MVHF ESA. To begin, we support the decisions not to install river crossings at points B, C and E. **However, we do not support crossings at points A and D.**

To support the plans for bridge crossings, the report uses degradation of air quality as a reason to install the structures: “users may drive from one side to [sic] other, while not presenting a significant impact to the ESA, may add to carbon emissions levels and degradation of air quality”. We believe this reason in support of the connectors should be stricken from the report as the chances that users are driving from one side of the river to the other, rather than exploring the area nearest to them, are negligible.

Moreover, the actual addition to carbon emission levels should some users drive to access a different area of the ESA are also negligible. The point is equally irrelevant because local citizens may also drive to other ESAs, parks or green spaces in the city regardless of the crossings simply because people like to explore new areas.

Under Enhanced Connectivity, much reference was made to the problems of erosion, however the report contains no maps showing areas of high erosion. Incidence of erosion should be a deciding factor in determining which trails will be closed. In some cases, areas that are experiencing high erosion may require improved trail surfaces to try to stop the erosion, but these should be highlighted on a map. On Figure 5, erosion is significant on the north side of the river between A18 and A17 (the bottom of the “boot”) but no reference is made as to future plans to deal with that erosion and how that will affect the level 2 trail found there.

As mentioned above, we do not support crossings at points A or D. We would like to know what the ecological problem is that is the City is trying to solve at these points and whether the crossings could actually solve the identified problem. According to our site visits, the informal trail to the north of the Creek at A is essentially non-existent and there is no evidence that visitors are crossing the river at either A or D. If large structures are placed in these areas and/or the trails are paved, it will simply serve to threaten the ecological integrity of the north. The most southerly part of the ESA (south of Gainsborough Road towards the University), is already heavily trafficked and the results of that use are apparent when compared with the areas north of D and the area between Access #4 and the False Rue.

If a crossing is established at either point, the trails would have to be greater than a Level 1, (as the bridge itself would have to be both wide and high due to potential for flooding) which would cause habitat fragmentation and increase the risk of introduction of invasive species. It would also increase visitor numbers, which while a benefit for recreation, would not be compatible with protecting the biodiversity in the area. There would be greater chances of inappropriate use, walking of trails, dogs off leash, illegally harvesting species and potentially disrupting species at risk and/or their habitat.

At the same time, we do not support the installation of stepping stones at either A or D, as such a crossing would not be safe due to high water levels, the distance to each side of the creek and the potential for the stones to become slippery. Stepping stones would also affect aquatic life in the creek and would change the flow rate. No surveys of aquatic species are included in the CMP.

VII. Community Engagement

We are in favour of increased community engagement and education uses of the ESA, including information signs and other activities. We have noted that Child Reach,

through their Wild Child program, take children into the woods and leave them to explore the area. While we are in agreement with bringing children into nature, teaching them about wildlife, plants etc, we wonder if the staff are trained in regards to how one should act in an ESA – the do’s and don’ts – and whether they are aware of invasive species and species at risk. We wanted to recommend that those that use the ESA for educational outings work with the City for training to avoid damage to sensitive areas.

VIII. Participation

The Working Group does not believe that the participation rates for the surveys and the meetings were not sufficiently high to be used to determine the need for Option C “Enhanced Connectivity”. Between 100-110 participants is a low response rate and given the number of comments that were likely disregarded, it is difficult to say how many people ‘actively’ participated in a meaningful way. We wonder why the survey was not more prominent, either on the City website, Twitter, etc.?

The survey was not well advertised and even some citizens living right by the ESA were not aware of the information sessions on offer. Therefore, we believe there was a statistically insignificant number of people involved in the survey. In addition, the Master Plan states that the information collected by citizens was just to be used as guidance for the plan, which suggests that the policy options were already in place prior to the information collecting. We believe that the exact information from the surveys should be included in the report for the purposes of transparency.

Moreover, the Draft appears to ignore participant input if it went against the favoured policy, namely enhanced connectivity. A good example of this bias occurs in the statement on p. 30, which reads, “Feedback indicates a desire for connectivity of the managed trails on the east and west sides of Medway Creek, though there is also clear opposition.” Given this was not a quantitative survey, a more balanced and accurate way of stating this would be, “Although there is a desire for connectivity from the public, there is also opposition to the addition of crossings and a desire to protect the ecological integrity of the site.” Or you could point out that 18 percentage of survey respondents indicated an interest in improved connectivity (as per the pie chart presented at LAC meeting #3).

IX. A final word

The City of London provides a variety of recreational opportunities in many diverse venues for the City’s residents. There are a few ESAs and the reason they exist in policy and practice is to protect identified species at risk, unique landforms, large forested areas, etc. They aren’t recreational areas like many of the fine areas we have in the City. The Medway Valley has been used (and abused) in a variety of ways since London was settled. Wouldn’t it be wonderful if it could now be treated as an

open air laboratory to study the impact of regeneration, naturalization and the nurturing of species at risk? Then it will be there for future generations.