

## **Stance of The Accessibility Advisory Committee**

The Accessibility Advisory Committee does not support the proposed “Conservation Master Plan Phase II; Medway Forest ESA (South)”. The proposed upgrades to accessibility are superficial; inconsistent with assurances made to ACCAC in the past; inconsistent with legislation (and the spirit of the legislation); and fall significantly short in providing equitable, quality access to the valley for all Londoners, regardless of ability. As noted below, ACCAC is supportive of some proposed changes, and could support the plan with two additional amendments.

### **Background**

When the original Trails Standards document [subsequently revised and replaced with the Guidelines for Management Zones & Trails in Environmentally Significant Areas (2016)], the Accessibility Advisory Committee was provided reassurances that, “whenever possible” trail systems would be made/upgraded to be accessible. Since the adoption of the original standards, this promise has been largely unmet. There are currently unfinished ‘accessible’ trails, non-compliant boardwalks and other structures, inadequate signage, incomplete accessible loops (meaning the user must return along the same path they already walked), among other concerns. Although ACCAC acknowledges the City’s efforts and intentions to continue to work on these areas of concern, the Medway Valley South CMP is an opportunity to ensure accessibility is considered and implemented fully at the onset, not in retrospect.

### **Proposal**

The Accessibility Advisory Committee recognizes some enhancements to accessibility were included in the proposal. ACCAC is in support of the following proposed changes:

- Bridge at crossing A and Level 2 trail from A5 to A10– as these enhancements will provide an accessible path thorough the northern most portion of the valley, connecting the Ambleside community to the Medway Valley North Accessible path system. ACCAC does however note this trail provides little regarding access to the actual valley. At virtually all points along this path development is clearly visible to the North, East and West, thus no ‘nature experience’ for Londoners requiring accessibility.
- Level 3 trail from A1 to A4 – as this enhancement will create an accessible connection of Medway Valley North, as well as those areas served by the proposed A5 to A10 route
- Trail surface improvements (such as those near A11 and A12) being completed to AODA standards

- 2 closed level 2 trail loops beginning at A19 and A14 - as these provide a limited degree of trail/nature experience, however noting this provides no route options, and limit path of travel to one route with a single entrance/egress point.

During discussions with City staff the Accessibility Advisory Committee was informed the existing proposal contained an error which directly impacts accessibility. The proposal identifies access point A18 as a Level 1 Trail. This is inconsistent with its existing usage and maintenance (contains an existing boardwalk). ACCAC was advised the portion of trail from A18 to the proposed Level 2 trail loop from A19 should be a level 2 Trail. On a walk through, ACCAC noted significant erosion and trail widening outside the segment of trail containing the boardwalk.

### **Accessibility Advisory Committee Proposed Enhancements**

The Accessibility Advisory Committee proposes 3 additional enhancements which would significantly improve accessibility within Medway Valley South while posing no risk to the environment.

- Upgrade the trail from A11 to the Medway creek at point D, noting this trail runs primarily along a utility overlay
- Install a Bridge at crossing D
- Extension of the boardwalk at A18 noting significant erosion exists, resulting in muddy surfacing and trail-widening (by those attempting to avoid the mud).

### **Rationale**

The combination of the upgrade to trail at A11 to Medway creek, and the bridge at crossing D will provide a connection between the proposed level 2 trail at A19 and the Ambleside community. Individuals can then follow existing roadways and park path to connect to the proposed accessible route (A5-A10). This pair of enhancement would mean the valley would now have 10 of the identified 24 access points connected through a single accessible path (plus one additional accessible point at A14). This also serves to connect to the accessible trail system in Medway Valley North. This pair of enhancements would make the trail system through Medway Valley the longest accessible nature trail available throughout the City of London.

Although these enhancements still require the user to exist from the valley and re-enter at a later access point (A10 to A11), this is consistent with all users as the existing informal trail from A12 to A11 is being closed.

These enhancements would mean Londoners requiring accessible trails could have an experience through the valley comparable to that of all Londoners.

The formalized bridge crossing at D also eliminates the need for 'impromptu' bridges or crossings being 'built' by persons in the valley. Thus, the accessibility enhancements also serve to reduce environmental impact in other sensitive areas, and reduce risk to the city and all Londoners (e.g. injuries to those using the impromptu crossings).

ACCAC would also like to reiterate the principal of trail development and maintenance... a well developed and maintained trail is best for the environment around it.

### **Legislation, Laws, Guidelines and Standards**

The proposal, as outlined in this submission by the Accessibility Advisory Committee is in adherence with all accessibility, human rights, and environmental legislation, acts, laws, studies, recommendations, Standards and/or Guidelines, at the municipal, provincial, federal, and international levels; including:

- Council approved Guidelines for Management Zones & Trails in Environmentally Significant Areas (2016)
- The Official Plan (The London Plan)
- Ontario Human Rights Code
- Accessibility for Ontarians with Disabilities Act (AODA)
- City of London's Facility Accessibility Design standards (FADS)
- United Nations' Convention on the Rights of Persons with Disabilities
- Ontario *Endangered Species Act, 2007*;
- Pull any referenced environmental legislation to this list
- Natural Heritage Inventory and Evaluation; Medway Valley Heritage Forest ESA (Dillon Consulting, January 2015)
- Recovery Strategy for the False Rue-anemone in Canada, 2016
- Upper Thames River Source Protection Area Amended Proposed Assessment Report (August 2011)
- Medway Creek Community-based Enhancement Strategy (Friends of Medway Creek and UTRCA, 2009)
- Guideline Document for the Evaluation of Ecologically Significant Woodlands (City of London, 2006)
- Middlesex Natural Heritage Study (UTRCA, 2003)
- The City of London Sub-Watershed Studies Implementation Plan (City of London, 1995)
- 2012 Upper Thames River Watershed Report Cards (Upper Thames River Watershed Report Card)
- Species at Risk Act (2002)
- City of London Environmental Management Guidelines (2007)
- Medway Creek Community-Based Enhancement Strategy (2009); and
- Any, and all further legislation, acts, laws, studies, recommendations, Standards and/or Guidelines referenced throughout the Medway Valley South Phase II Conservation Master Plan development process.

## Summary

Important to note, the proposal put forth by ACCAC is consistent with all legislation and guidelines used by the City of London and honours commitments made to the accessibility community. The additional enhancements included in this proposal do not require any paving or asphalt surfacing. The enhancements requested simply ensure firm, stable ground (which *could* include asphalt *if* the city and the trails advisory committee felt it were the most feasible option. The ACCAC proposal calls for limited additional development, i) extension of the board walk at A18, and ii) a bridge at connection point D; noting this point of connection is the only place along the river that can be accessed from both sides without risking environmental damage.

The proposed additional enhancements provides Londoners requiring accessible paths with the largest, most comprehensive, comparable and equitable trail experience anywhere in London. These enhancements further connect accessible pathways (outside the valley), Medway Valley North; and the communities of Sunningdale and Ambleside, through one continuous accessible trail/pathway system.

ACCAC further calls on the City to ensure adequate funding is budgeted to complete the proposed upgrades.

Finally, in recognition of concerns this proposed plan *could* result in increased pedestrian traffic through the valley, ACCAC supports any call for additional enforcement of municipal bylaws, monitoring of environmental impacts, and any calls for funding necessary to achieve these objectives.

## **Medway Valley Heritage Forest (South) ESA Conservation Master Plan 2017**

### **EEPACs Recommendations**

As EEPAC's representative on the LAC, and one of the EEPAC reviewers of the MVHF ESA CMP, I am seeking input and support from EEPAC to present a statement from EEPAC to PEC. I am requesting consideration of the following statement and recommendations for presentation from EEPAC to PEC.

#### ***Statement***

EEPAC does not support the MVHF (South) ESA CMP because the CMP is counter to the current city plan. The CMP fails to adequately protect the long-term ecological function and biodiversity of the area. See City's current Official Plan's statement concerning the use of natural heritage features:

15.1.1 (v) Maintain, restore, and improve the diversity and connectivity of natural features, and the long-term ecological function with biodiversity of natural heritage systems.

In particular, the "upgrading" or hardening of trails on either side of crossing A (figure 5) and the trail that runs parallel to Attawandaron Road in the proposed area of naturalization (NAS in Figure 2) and the construction of the bridge crossing the Medway Creek at A (Figure 5) put at risk the ecological integrity of this ESA.

We support and encourage even greater efforts to close informal trails, improve signage to better educate the public about the ESA and trail closures, restore natural habitat to protect species at risk, and naturalize some areas. We also support the stepping stone crossing at Snake Creek (C) because it should reduce erosion at this site.

#### ***Recommendations***

1. We recommend, based on a serious risk to the ecological integrity and biodiversity of the MVHF ESA, that the council reject any CMP that includes hardening of trails or bridge crossings of the Medway Creek.
2. We recommend council encourage staff to focus the CMP more on protecting the ecological integrity of the MVHF ESA and less on recreational use in a revised CMP. There should be better development of more detailed plans for monitoring, trail closures and education in a revised CMP in order that EEPAC and others can accurately assess those plans.
3. We recommend that the council encourage staff to rethink the MVHF ESA CMP. This is a small, but unique and incredibly diverse environment that has been, to date, preserved within an urban center. Instead of focusing on increasing recreational use of the area, we encourage the council and staff to see a secondary goal as an opportunity for this ESA to become a renowned demonstration site of best practises for the protection of ecological integrity, diversity and species at risk within an urban area.



## NATURE LONDON

### CONSERVATION ACTION ALERT!

#### Medway Valley Heritage Forest Environmentally Significant Area (ESA)

Since 2013, the City of London has been preparing a Conservation Master Plan (CMP) for the southern portion of the Medway Valley ESA. This process is rapidly nearing a conclusion. The final draft of the CMP contains proposals which, in the view of Nature London's Conservation Action Committee (CAC), threaten the ecological integrity of this jewel of London's natural heritage. The latest draft may be seen at (the final report will not be available until Feb 14th.

[https://www.london.ca/residents/Environment/Natural-Environments/Documents/MVHF\\_ESA\\_south\\_PhII.pdf](https://www.london.ca/residents/Environment/Natural-Environments/Documents/MVHF_ESA_south_PhII.pdf)

The CMP will be presented to the Planning and Environment Committee (PEC) of Council at a public participation meeting at City Hall on February 20, beginning not before 5:15 p.m.

Your help is needed! Here's why.

Specifically, the draft recommends construction of a bridge over Medway Creek south of Fanshawe Park Road. Given the physical requirements of the proposed site, this bridge likely would be a large 10-15 m long bridge like those north of Fanshawe to Sunningdale Road. (There are currently no crossings of the Medway in the southern portion of the ESA). The draft also recommends creating 800 m of paved or asphalt surface paths in place of the natural hiking trails leading to the creek from near Fanshawe Park Road and from the Creek to Glenridge Crescent on the east. The fundamental purpose of an ESA is to protect the ecological integrity of areas of the City designated for their special qualities. There is, however, no ecological justification for the proposed bridge and pathway construction. City policy clearly makes recreation secondary to environmental protection in its ESAs.

Other parts of the draft CMP contain valuable recommendations for naturalization, invasive species management, and monitoring, but these are not accompanied by spending commitments. Therefore, the Conservation Action Committee recommends that Council defer approval of the revised CMP (once the bridge and trail construction proposals have been removed) until funding commitments can be made as part of the City's 4-year budget process.

The bridge and trail construction proposals are especially alarming because they could have a negative impact on a spring flower, False Rue-anemone, which is designated as Threatened by both the Provincial and Federal governments. The largest population in Canada of this beautiful white flower, a flood-plain specialist, is located in the Medway and would be subject to a greater risk of trampling. The City has devoted considerable effort and expense to protecting False Rue-anemone from invasive Goutweed, but the proposed bridge and trail construction will bring greatly increased foot, dogs off leash and, potentially, bicycle traffic into precisely the habitat of this population. Consequently, conservation-minded members of the Local Advisory Committee for the CMP have recommended to Council that these objectionable proposals be deleted from the final CMP.

Here's what you can do to help:

- Contact your City Councillor and ask for the CMP to be modified, by removing the bridge and trail construction proposals from the plan and deferring acceptance of the rest until funding is confirmed through the 4 year budget (see email addresses below).
- Submit a letter to pec@london.ca not later than Feb 12, to be placed on the PEC agenda.
- Attend the public participation meeting on February 20 and speak in support of these CAC recommendations for modification to the draft CMP.
- Just attend the public participation meeting to show your support for conservation.
- Contact other conservation minded friends to do the same.

Thank you for your support of protecting one of London's Environmentally Significant Areas.

#### Councillor e-mails

mayor@london.ca, mvanholst@london.ca, barmstro@london.ca, msalih@london.ca,  
jhelmer@london.ca, mcassidy@london.ca, psquire@london.ca, joshmorgan@london.ca,  
phubert@london.ca, ahopkins@london.ca, vridley@london.ca, sturner@london.ca, husher@london.ca,  
tpark@london.ca, jzaifman@london.ca





Photo by Keith Zerebecki, Friends of Medway Creek

# UPDATE

## HABITAT PROTECTION, RESTORATION & STEWARDSHIP

### MEDWAY VALLEY HERITAGE FOREST ENVIRONMENTALLY SIGNIFICANT AREA

City of London - Habitat Protection, Restoration & Stewardship Initiatives 2017-2018

1. The City, Dillon Consulting and UTRCA recognized for their innovative invasive species management, habitat protection and contributions to the Federal Recovery Strategy for the False Rue-anemone (*Enemion biternatum*) in Canada (2016).
2. The Draft Conservation Master Plan Phase 2 MVHF ESA (South) identifies that all Top and High (and some Moderate and Low) priority restoration work is underway, completed and/or under a monitoring program.
3. Phragmites, Japanese Knotweed, Buckthorn, Scots Pine, Goutweed, Garlic Mustard, Purple Loosestrife and Periwinkle are monitored and managed annually.
4. 2017 London Community Foundation funded additional invasive species control and native tree planting in MVHF ESA south.
5. The City received provincial awards from Ontario Nature and the OALA for demonstrating community leadership and exceptional achievement in planning and implementing programs that protect and regenerate the natural environment.
6. Butternut Habitat Stewardship Protection SAR Federal Grant and study underway.
7. Three groups have adopted portions of the ESA through City's Adopt an ESA program.
8. The Friends of Medway Creek (FOMC) proposal for interpretive ESA signs and benches were winners in the Medway Decides City funded program.
9. City and FOMC community tree planting, fish demonstrations held in 2016, 2017.
10. London is first in Ontario to draft a City-wide Invasive Plant Management Strategy with support from the Ontario Invasive Plant Council.
11. The City's London Phragmites Working Group is developing London's Phragmites Management Strategy the largest initiative in the Great Lakes Basin, with Ontario's Phragmites expert Dr. Janice Gilbert.
12. City is an identified leader among Ontario municipalities and other levels of government in the management of invasive species in protected natural areas since 2007.

For more information on habitat protection, restoration and stewardship initiatives and opportunities, please contact the City of London Environmental & Parks Planning Section.

#### CONTACT

Ecologist, Linda McDougall  
519-661-2489 ext. 6494  
lmcDoug@london.ca

Visit our website: [www.london.ca/ESA](http://www.london.ca/ESA)

UPPER THAMES RIVER  
CONSERVATION AUTHORITY



