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June 15, 2012

Chair and Members  
Planning and Environment Committee  
City of London

Re: item 13, Trails in Environmentally Significant Areas

There is much to recommend in this report. The work before you reflects the best in public process – a genuine effort by staff to listen to a wide variety of points of view including councillors, residents, naturalists, and development interests. It is a good model to follow.

The document takes into account Official Plan and Provincial policies that require the municipality to protect Environmentally Significant Areas. It is the responsibility of the City to demonstrate that there will be “no loss of ecological features or functions for which the area has been identified” (*Provincial Policy Statement, 2005*). Meeting the test of the *Provincial Policy Statement* is the main reason why trail planning and design within ESAs must be based first on ecological protection through avoidance of impacts, and secondly, the application of appropriate mitigation where necessary to avoid degradation of natural features or loss of ecological functions. (page 3, Trail Standards document)

The basic principle for trail planning and design is to protect the natural features and ecological functions for which the ESA has been identified. The ecological integrity and ecosystem health of the ESA shall have priority in any trail use or design-related decisions. (page 4, Trail Standards document). This report and the document are a step in the right direction to keep our Environmentally Significant Areas special places that can be enjoyed but not loved to death.

Also, there is recognition that for all new ESAs taken into City ownership, signage will be installed upon completion of the Conservation Master Plan and preferably prior to the development of any nearby site. (page 42, Trail Standards document). This step has been missing in the development approval process. Hopefully this be implement as part of the roll out of the Southwest Area Plan presented to this Committee today as SWAP includes the East Lambeth Forest Environmentally Significant Area.

I have only three recommendations.

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1. Changing a word from may to shall just to ensure that the model of public participation continues to be followed.

This process **may** include consultation with Environmental and Ecological Planning Advisory Committee (EEPAC), public participation meetings, and a public meeting before Planning Environment Committee. (Trail Standard document page 5, change “may” to “shall”)

2. Recommend a part H “A review / report on the implementation of the Trail Standards document be presented to this committee within 5 years from today.”
3. I do hope that Council agrees and that in addition to ongoing improvements to this document as it is used, that Council must continue to budget sufficient funds for the implementation piece which includes the following. Unfortunately, implementation has not always been adequately carried out. If Council is serious about protecting these areas for the future, the resources and the direction must be provided for the following:
  - Signage including explaining the blaze system
  - Managing invasive species
  - Enforcement of city by laws
  - Ecological inventories (baseline conditions)
  - public consultation
  - Monitoring

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