

March 2018

Chair and Members
Planning and Environment Committee
City of London

Dear Chair and Members,

I am writing to express my concerns regarding the Conservation Master Plan (CMP) for the Medway Valley Heritage Forest (MVHF) (South) Environmentally Significant Area (ESA) as it is currently written. It is my belief that proposed projects within the CMP are contrary to the primary management goal of ESAs, which is the protection of biological diversity and ecosystem services within the City, as outlined in the City of London's Official Plan. The MVHF ESA CMP places disproportionate emphasis on recreation and increasing visitor use in lieu of guaranteeing the environmental integrity of an urban green space housing threatened species.

Let me begin by being clear that I support children exploring nature. I sincerely believe that without regular access to the natural world around them, children will not become adults who appreciate -- and wish to conserve -- nature. I likewise acknowledge that regularly visiting provincial and national parks is not a luxury everyone can afford, and so it is incumbent upon us to offer the possibility for London's citizens to enjoy nature close by. And further, I acknowledge the value and importance of making nature accessible to those with limited mobility, as access to nature should be a right available to all. The City must certainly be mindful of the new regulations under the AODA that require all new or redeveloped trails to be accessible. City planners then have the difficult task of balancing all those needs with the duty to conserve the wild spaces of our city.

Even so, the evaluation of the MVHF trail system with the introduction of a new CMP does not signify that every Level 1 trail must automatically be upgraded to a Level 2 or Level 3 trail. Exceptions exist for retaining some narrow, low impact trails, particularly if widening a trail or providing connections would adversely affect plants and/or wildlife (especially species at risk) and/or would harm the ecological integrity of the area. It has been claimed in the CMP that evidence exists that people are currently crossing the river at both Site A and Site D. Yet, I believe that this is false, particularly at Site A. Late this summer (2017) after low rainfall, the creek at that point was clearly too deep for visitors to traverse. Moreover, there was no evidence (i.e. a trail or trampled plants) on the eastern bank of the creek to show visitors were accessing the river from that side. Furthermore, in the summer and early fall, from access point A5, only a single narrow trail, hemmed in by tall plants, led to the river. There was no evidence of visitors wandering off the path. One ascertains from this that there is no ecological justification for upgrading the Level 1 trail to a Level 2 or even Level 3 trail as visitors are not creating harmful informal trails, nor are they crossing the river at such a deep point; therefore, the proposals for the bridge and trail hardening have a solely recreational purpose and should be evaluated accordingly.

The assertion on page 35 of the most recent MVHF CMP Phase II report (March 2018) that "EEPAC's recommendation in Appendix D that 'Council reject any CMP that includes hardening of trails or bridge crossings of the Medway Creek' is in direct conflict with the Council approved Guidelines and AODA legislation" is likewise misleading. That claim would only hold true if the primary purpose of an ESA were to facilitate and enhance outdoor recreation in the city. However, recreation is a secondary concern of ESAs. The first page of the CMP clearly states: "Preserving the ecological integrity and ecosystem health of [ESAs] is the first priority." Since, conservation and preservation of threatened and unique habitats and species is the top priority, the CMP should

not include bridge crossings and hardening of trails that may directly and indirectly negatively impact the ecological integrity of this area.

We have also heard frequently in the course of this process that the establishment of hardened trail surfaces will better protect the species within the ESA. However, it is not proven that upgrading Level 1 trails to Level 2 or even Level 3 trails will stop users from wandering off designated paths; some visitors will simply want more of a “nature” experience than a hardened path can provide, and will seek those options out. On a trip to the MVHF ESA this past month, in an area near the proposed bridge at Site D, I witnessed eight visitors (and their dogs off-leash) walking throughout the grassy, sloped area beside the Level 2 trail loop that can be accessed by A19 or A18. These visitors did not even adhere to the *informal* trails that already crisscross this area, and which are plainly visible before the wildflowers and plants are at their full height. Clearly the Level 2 trail did nothing to keep people to the designated paths. This behaviour raises serious concerns for the future of the area located around the proposed bridge Site A and for those areas which house threatened plant species, such as the false-rue anemone. Moreover, allowing off-leash dogs to trample through grassy areas risks disturbing and/or harming nesting birds and other animals.

I am very familiar with the proposed crossing site at D, due to its proximity to my house, but site A was new to me before this process. I have made a point of visiting Site A through each season to assess the suitability of a bridge and hardened trails in that area. Each time it has been plainly evident that a bridge and upgraded trails are unacceptable for that area. On March 28, 2018 I walked the level 1 trail on the north side of the Medway, south of Fanshawe, which connects the wooden gate at A5 to the river edge (potential future site of the bridge). On the western side of this path, there is a wetland and it is obvious that during the spring, after the snow melts, this wetland extends almost to the river edge or, very likely, completely to the river during flood events. On this day, the path was hidden under ankle deep water, which I documented with photos. This presence of deep water over the path is significant because it means that no granular surface can be used to create the level 2 trail from the entry to the river; any product used -- pebbles, wood chips -- would wash away into the surrounding area and ultimately into the river. Moreover, directly beside the creek on the north/west side, there is a stretch of land that heads south, creating a little hidden bay. On this visit, I observed that the water from that bay was overflowing creating a small creek that was running into the Medway -- essentially a looped system around an island. Again, any granular surface used to create the level 2 trail in that area would wash directly into the creek, seriously harming aquatic species and their habitat. Therefore, the only solution would be to pave the entire section, from A5 to the proposed bridge.

Yet, it is precisely the paving of that section that I believe should be avoided. The portion of the MVHF south of Fanshawe and north and south of the creek is an extremely important piece of green space. Of course, one important difference between ESAs and public parks is that they are areas which are primarily for the benefit of plants and wildlife, and serve as biological stepping stones for migrating species in the highly fragmented environment of southwestern Ontario. Paving this section of the MDHF with a 1.5-2m wide trail would significantly alter the “natural” feeling of this area, more consistent with a park than a protected area. In the summer, the area is thick with plants, especially milkweed, and full of insect activity. The insects are so loud in that portion of the ESA, as are the birds that feed on them, that they drown out the sound of the Fanshawe Park road traffic. Indeed, that region is so full of wildlife and plant life that one readily forgets that one is in the confines of a city. Installing two bridge structures and criss-crossing the ESA with hard surface or similar wider trails will have serious impacts on the area. Beyond the actual installation of the structures, the increased visitorship and its associated issues -- litter,

dogs off leash, bike use, illegal harvesting of plants, spread of invasive species -- will have repercussions for years to come, altering the behaviour of the animals inhabiting the area, likely even forcing them to find a home elsewhere.

I firmly believe that the City must exercise caution before building any bridges across the Medway and should reconsider turning a number of Level 1 trails into Level 2 or even Level 3 trails. Once the proposed structures are introduced to the ESA, it is highly unlikely they would ever be removed, even in the face of overwhelming evidence that the changes have negatively impacted the region. The area around Site D has seen a sharp increase in use since the last CMP and has since lost much of its "wild" feel. I am not suggesting that it is bad that that area is so heavily used; we should encourage appreciation of our green spaces and physical activity. However, that section of the ESA can serve as a benchmark for what one could expect if the area around A5 were paved and if a bridge were installed there -- a gradual shift to a relative biological desert as some species disappear due to disturbance and/or invasive species move in as the region becomes stressed. I am convinced these structures have the potential to damage the biological integrity of the ESA and to put further stress on threatened species, such that the ESA will lose the element that made it special and worth protecting in the first place.

It is possible to allow for quality trails for those with mobility restrictions, while still retaining Level 1 trails, such that some particularly wild or less-disturbed areas can remain in such a state. The natural environment in Southwestern Ontario is under considerable pressure due to its growing population and expanding development. Housing and various infrastructure projects are carving out ever greater sections of farm land, forested areas and even wetlands creating a fragmented landscape that hinders the passage of wildlife and removes plant life. The stresses on these species and the need for natural landscapes will grow as the effects of climate change become more prevalent in our province.

In the end, the issue hinges on a misinterpretation of the priorities and goals of ESAs. It bears noting that according to Policy 1367 of the London Plan, "Environmentally Significant Areas (ESAs) are large areas that contain natural features and perform ecological functions that warrant their retention in a natural state." London is not immune to urban expansion and the loss of green spaces, and already London is experiencing some of the effects of climate change, such as unpredictable weather patterns, pollution and the urban heat island effect. The City should do everything it can to safeguard its Environmentally Significant Areas for the vitality of the municipality, for the health and wellbeing of its current and future citizens, and for the continued survival of its threatened species.

Sincerely,

Carol Dyck
MSc (Oxford), LL.M (Kent)