

April 5, 2018  
Chair and Members Planning and Environment Committee  
City Hall London, Ontario

Dear Chair and Members, Planning and Environment Committee:

**Re: Comments on Draft Medway Valley Heritage Forest ESA (south) Conservation Master Plan**

I have been following the Medway Valley Heritage Forest Environmentally Significant Area (South) Conservation Master Plan (MVHF ESAS CMP) process closely, have attended public information centres, and have submitted comments to the Planning Dept during the process. The CMP does have many worthy proposals, but it also raises environmental concerns. Below are my comments and concerns about the draft MVHF ESAS CMP that City Staff will present at the meeting on April 16. I hope the Planning and Environment Committee (PEC) will give these careful consideration.

- 1. The CMP is inconsistent with the London Plan because it does not place protection of natural features and ecological functions for which the ESA has been identified (the *primary* management goal) above provision of public access for recreational and educational purposes (the *secondary* objective). ESAs in our city are refuges for wildlife and provide protection and habitat for special vegetation communities, rare species and/or species at risk listed under COSEWIC and/or COSSARO, and special landforms and hydrological features. They are not gardens or City Parks designed and engineered with form and function foremost in mind to cater to human recreational use. The basic flesh and bones (natural heritage features, ecological habitats, biodiversity, and landforms of the ESAs) are already there and the CMPs should protect and enhance these natural attributes. The *Guidelines for Management Zones & Trails in Environmentally Significant Areas* (henceforth referred to as the *Guidelines*) should not be used to justify unnecessary manipulation or management of any ESA to provide access and recreation. There are many City Parks that provide opportunities for access and recreation for both able-bodied and disabled persons.**
2. I have concerns that, just because there is now a Guidelines document, there seems to be an irresistible urge on the part of City staff and consultants to place trails in some sensitive areas of the ESA, which might be better left off limits to public use. For example, in and close to areas of species at risk (False Rue-Anemone, etc.) and sensitive vegetation communities, even though there may be a Utility Overlay for the trunk sewer in these areas.
3. I do not support the pedestrian bridges proposed at Points A and D, crossing the creek, because it is my opinion that these are not appropriate for the ESA, especially with three large west-east bridges already spanning the north portion of the MVHF ESA. I cannot agree that such crossings are needed, and I think the existing Level 1 trails in the vicinity of Points A and D are adequate and should not be hardened to Level 2 trails. The protection of the sensitive ecological features of the ESA, including the creek banks and creek itself, should trump accessibility requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA). There are other, environmentally less sensitive, parts of the MVHF ESA where access for the disabled is provided. Furthermore, approximately 82% of respondents

(the majority being able-bodied, I assume) who completed the City's MVHF ESAS CMP Survey in June 2017 did not support connections across the creek, so I see no reason why the City is using the AODA to justify providing bridges across the creek for disabled persons. To cite the AODA's Ontario Reg. 191/11 requirement to justify building bridges is to extend it beyond its legitimate application. Nothing in the AODA or its regulation requires the City to build bridges where none currently exist.

4. The proposed pedestrian bridges across the main creek will have to be a much larger and more intrusive structures than the bridge over the small tributary near the Metamora entrance, which has been used disingenuously by City staff in previous drafts of this CMP as an example of a creek crossing when main creek crossings were considered.
5. I participated in the June 2017 Survey about trails and linkages and was disappointed to find that the review and compilation of the results by the consultants was not done quantitatively or statistically. I understand that only 18% of the trail survey respondents supported enhanced connectivity, a clear minority of the respondents, whereas a significant majority opposed enhanced connectivity, especially across the main creek. This begs the question, "Why bother asking for public feedback if it isn't to be taken seriously?" Did the results not meet the City's expectations?

Thank you for the opportunity to provide comments on the MVHF ESA (South) CMP, which I hope will receive your careful consideration.

Sincerely,

Anita Caveney.

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Cc: Heather Lysynski, for placing on the meeting agenda of the Planning and Environment Committee for April 16, 2018.