

April 20, 2018

BY E-MAIL

London City Council
London City Hall
300 Dufferin Avenue
London, Ontario
N6B 1Z2

Dear Council Members,

RE: Conservation Master Plan – Medway Valley Heritage Forest ESA South

I, my wife, our 3 children and my parents own homes located at 1587 Ryersie Road and 1563 Ryersie Road. Having lived in varying locations in north and south London for over 40 years, we were ultimately drawn to this specific area – I and my wife to raise our young children, and my parents to enjoy their retirement years – in large part due to the uniqueness of Medway Valley South.

As we only learned of the MVHF ESA (South) Phase II CMP in March 2018, we were barely able to review portions of the lengthy (159 page) Plan prior to attending the Public Participation Meeting of the Planning and Environment Committee (PEC) on April 16, 2018. We remained in person for several hours and reviewed portions of the subsequent lengthy discussions via the online link which spanned almost 8 hours. We have several concerns with the plan as it stands and would **request Council not to approve the Master Plan** without further consultation for the reasons discussed below.

1) **PROCESS GAPS:**

a) **Lack of Stakeholder Consultation:**

- i. As highlighted at the Public Participation Meeting, numerous residents of our neighborhood living on the streets of Gloucester Road, Ryersie Road and Green Acres Drive repeatedly described a lack of inclusion (tending towards *exclusion*) from this 5 year process until a chance awareness of the Public Meeting a month prior.
- ii. Further, the Local Advisory Committee (LAC) and Terms of Reference in the CMP do NOT include representation from this neighborhood despite inclusion of other neighboring communities of the MVHF ESA – several of which are geographically much further away.
- iii. In consultation with Accessibility Advisory Committee (ACCAC) as required by Accessibility for Ontarians with Disabilities Act (AODA), a revision requested by ACCAC in their January 2018 letter (*page 125/159, section 4.2 CMP*) which would impact the public street of Gloucester Road and the related Level 1 trails did NOT trigger consultation with stakeholders in our neighborhood
- iv. As mentioned several times at the April 16 Meeting, First Nations community stakeholders were not consulted. Consultation with this community is even more important “where structures don’t currently exist” as per the proposal of creation of 2 large bridges (*online link 7:06:10*).

- b) **Stakeholder Misrepresentation:** The Environmental & Ecological Planning Advisory Committee (EEPAC) stated at the Meeting that “EEPAC was never asked to nor did they endorse the Trail Guidelines” as stated in the staff report (*online link 2:18:55*). Also, EEPAC stated at the Meeting that they did NOT endorse the latest version of the CMP of March 2018 and April 9, 2018 due to tight timelines.
 - c) **Lack of Consensus:** Minutes from the latest Local Advisory Committee Meeting of February 21, 2018 reveal divergent views and divisiveness with regards to the CMP (*page 122-127/159 CMP*). Submission to the PEC in March 2018 for approval of a Plan with poor consensus is baffling. A split vote by the PEC necessitating the meeting next week by Council was therefore not surprising and further exemplifies the lack of a sound, well-received Plan.
- 2) **ESA DESIGNATION (NOT A PARK):** The strength of the CMP is in (re)mapping threatened, rare and endangered species of the MVHF ESA, building on Jane Bowles seminal work from 1989 on how to manage, protect and preserve those species (*online link 7:03:00*). Purposeful intensification of traffic in MVHF ESA through augmentation of trails would be counter to the “Conservation” goal of the CMP as stated by multiple attendees at the April 16 Meeting and would result in negative environmental impact to flora and fauna.
 - 3) **CONNECTIVITY IS NOT THE PRIORITY:** The need for management, protection and preservation of the MVHF ESA takes priority over the desire for Connectivity and Recreation. Stakeholders, representing the *minority* at the April 16 Meeting, expressed a *desire* for more connectivity of the North & South segments of the MVHF ESA. The latest version of the CMP calls for augmentation of existing trails which would create a meandering 500 meter “detour” away from the endangered False Rue-Anemone. This proposed detour would require deforestation, switchbacks and intensification of pedestrian traffic through a public street – Gloucester Road. Trespassing via the path of least resistance through an informal trail and thereby trampling on the rare flora would be an inevitable reality for which policing resources are not budgeted, nor feasible. Creating bridges “A” and “D” would increase the likelihood of this negative environmental impact significantly.
 - 4) **ACCESSIBILITY IS NOT THE PRIORITY: The AODA** (section 80.6) which “applies to **newly** constructed and **redeveloped** recreational trails” **except if (section 80.15) “there is a significant risk that the requirements, or some of them, would adversely affect water, fish, wildlife, plants, invertebrates, species at risk, ecological integrity or natural heritage values, whether the adverse effects are direct or indirect**.** ** *INDIRECT EFFECT* = “effects that occur in a location different from the location where the activity causing the effects is taking place” (from Categorizing and Protecting Habitat under the Endangered Species Act, Feb., 2012, pg. 9). As repeated multiple times by experts and other attendees at the April 16 Meeting, there would be a significant risk to the flora and fauna.

For sake of brevity and the short timeline, we have chosen not to address other aspects to this issue which have been raised by others.

We hope you will consider this matter carefully and urge you to each vote against the Conservation Master Plan.

Please provide a copy of this correspondence in the formal package to Council at the upcoming meeting.

Sincerely,



Aashish Goela

(on behalf of)
Neena Goela
Akshaye Goela
Arjun Goela
Anjna Goela
Ranjit Goela
Suman Goela

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