



Nature London

The McIlwraith Field Naturalists of London Ontario Inc.

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Actively concerned with Nature since 1864

March 16, 2013

Andrew Macpherson
Manager III, Parks Planning and Design
Environmental and Parks Planning
383 Richmond Street, 11th Floor

Dear Andrew:

Re: Medway Valley Heritage Forest: Trail in northern portion (Sewer Phase 2 area)

The *Planning and Design Standards for Trails in Environmentally Significant Areas* (2012) specifies that the basic principle for planning and design of a trail system is to protect the natural features and ecological functions of the ESA. Implementation of trails for recreation and education is acceptable only if that basic principle can be achieved. Given the unfortunate degradation of the ESA by construction of the sewer, it is of utmost importance to ensure further damage is avoided or minimized, especially in areas not damaged by the sewer installation.

City policies for protection of ESAs have been strengthened in recent years. With new policies in place, it is no longer realistic to contemplate the pathway system that was proposed back in 2005. In January 2012, City Council amended the Official Plan, adding new policies to define and clarify the unique classification of Environmentally Significant Areas within the Parks' Hierarchy System. Further degradation of the northern portion of the Medway Valley Heritage Forest (MVHF) ESA to achieve additional access would be contrary to the spirit and commitments of the Official Plan.

The Accessibility Standards for the Built Environment under the Accessibility for Ontarians with Disabilities Act (AODA) recognizes an exemption (Section 80.15) for recreational trails due to risks to natural features and functions. We believe the City's ESAs qualify for this exemption. In the northern section of the MVHF ESA, three paved accessible points already exist (Attawandaron, Hickory Stick Key, and Valley Run Blvd). Therefore, it is not necessary to construct additional accessible trails in the northern portion of MVHF ESA. More access in future will be provided, when the new east-west paved link is constructed parallel to Sunningdale Road, between the storm water management pond (SWMP) south of Sunningdale Road on the east side of Medway Creek and the Sunningdale West SWMP.

At the recent meeting of the Planning Advisory Group, we tried very hard to find a compromise position that would address some of the objectives of neighbourhood residents, while still protecting the ESA. Since the effort to find common ground was

unsuccessful, we feel that the only acceptable course of action for Nature London is to hold as closely as possible to our original position (i.e., support of Option 4C), and support the protection of the ESA as required through the policies of the Official Plan and the *Planning and Design Standards for Trails in Environmentally Significant Areas* (2012). We recognize that the proposed east–west pathway connection between the Sunningdale SWMPs, crossing the Medway Creek at a future Bridge 3, according to Enhanced Option 5B, introduces a stretch of paved pathway that was not included in Option 4C. However, we also recognize that this pathway may help to keep bicycles out of the most sensitive areas of the northern portion of MVHF ESA, especially if baffles are installed between paved pathways and non-paved hiking trails.

Nature London would appreciate clearer details of the rationale that has been used in determining the management zones in the North Medway study area. In any event, it would be inappropriate to make final recommendations regarding the management zone boundaries and the location and type of trail around the bend before the April 9 meeting, as many spring wildflowers will not be visible above ground until later in April, or in some cases, May or June. In verifying locations of seeps, it should be recognized that existence or intensity of seeps may vary from year to year depending on climatic trends. In any management zone within an ESA, protection of natural features and functions is the principle governing all trail design.

To protect the ESA and minimize user impacts, we support a north–south system as described below:

- Route takes advantage of existing asphalt.
- Additional asphalt provided at the north end only, to provide access to the proposed lookout and for the east–west community link that will be south of and parallel to Sunningdale Road, as described above.
- No asphalt added southward from proposed oxbow lookout.
- No additional asphalt northward from existing asphalt pathway near Valley Run Blvd.
- Baffle gates must be installed at any transition from asphalt pathway to hiking trail.
- Trail around bend is a narrow (minimal footprint) Level 1 hiking trail using natural substrate. (We question the suitability of wood chips for this stretch of trail.)
- Seeps and small watercourses are crossed by boardwalk.

Despite suggestions to the contrary, the informal hiking trail that currently exists around the bend appears to be sufficient for current use. We believe this type of trail should be sufficient in future as well, providing that sufficient priority is given to enforcement of “no bicycle” rules wherever they apply in the MVHF ESA.

Nature London thanks you for the opportunity to provide comments.

Yours truly,

Anita Caveney, David Wake and Winifred Wake
Nature London Representatives on the Pathways Advisory Group (PAG)

cc: Bonnie Bergsma, Linda McDougall