



Nature London

The McIlwraith Field Naturalists of London Ontario Inc.
P.O. Box 24008, London, Ontario N6H 5C4

April 12, 2013

Mayor Joe Fontana and Council Members
City of London, Ontario

Dear Mayor and Council Members:

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

Nature London supports the Planning staff-proposed trail Option 5B Enhanced, not the “Enhanced” Option 5B Enhanced that was approved by the Planning and Environment Committee on April 9, 2013. This latter option is clearly more or less the same as Option 4A. Nature London urges Council to reject the P & E Committee’s decision, *which goes against the City’s ESA policies*, and instead approve Planning staff’s proposed Option 5B Enhanced.

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.

Nature London thanks you for the opportunity to provide comments.

Rationale

◆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



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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 Integrated Accessibility Standards for the Built Environment under the Accessibility for Ontarians with Disabilities Act (AODA) recognizes an exception (Section 80.15.5), which states "80.15 Exceptions to the requirements that apply to recreational trails and beach access routes are permitted where obligated organizations can demonstrate one or more of the following: 5. There is a significant risk that the Actively concerned with Nature since 1864 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." We believe the City's ESAs qualify for this exception. 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 March 6, 2013 meeting of the Planning Advisory Group (PAG), representatives of organizations concerned about potential threats to the ecological integrity of the MVHF ESA posed by the preferred option supported by developers, residents neighbouring the ESA and others, 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, Nature London representatives felt that the only acceptable course of action was 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 east-west pathway connection between the Sunningdale SWMPs, crossing the



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Medway Creek at a future Bridge 3, featured in Option 5B Enhanced (the option recommended by Planning staff to Planning and Environment Committee on April 9, 2013), 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. Therefore, we supported the staff-preferred Option 5B Enhanced at the April 9th meeting. The Planning and Environment Committee approved an “Enhanced” version of Option 5B Enhanced, which introduces more paved pathways into the sensitive area of the ESA close to the bend in the creek.

◆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.

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.

Yours truly,

Anita Caveney
Nature London Representative on the Pathways Advisory Group (PAG)