

November 30, 2021

**Ms. Chandra Sharma,
Chief Administrative Officer
Niagara Peninsula Conservation Authority**

Hello Ms. Sharma,

Thank you for giving the Friends of 12 Mile Creek the opportunity to make a presentation to the Board of NPCA on November 19, 2021. We discussed the mountain bike racecourse development in the Riverview ravine, regarding its use for the Canada Games 2022, and its long term use post-Games.

Because it did not seem that the Board was in possession of all relevant data, we would like to provide you and the Board with some additional information that may assist with a deeper review of this development.

It is our opinion that adding a racecourse to this sensitive, erosion-prone urban ravine will defeat the very purpose of the ravine's designation as a protected Significant Woodland area. Some of the main effects of the racecourse will be decline of significant vegetation, extensive wildlife loss and an undefined effect upon slope soil structure. This is already happening as construction proceeds. A very large proportion of the ravine is undergoing significant alteration as new trails and special mountain bike features are created. The change to the ravine is profound.

The permit for the Games was approved on the basis that the use was "passive recreational use". We believe that a mountain bike racecourse cannot be viewed as passive. The impacts are too major. There are many features of mountain bike racing (compared with regular cycling) which make a sensitive ravine setting particularly unsuitable for a racecourse:

1. The racecourse must be a continuous loop, so that riders are kept separate. In a ravine setting this means that the course must cut through the ravine twice, once in each direction. This essentially doubles the environmental impact.
2. The double trails of the planned continuous loop cause severe environmental stress in areas where they are close together and encourage rogue trail building when they are more separated.
3. Because of the course preparation for high speeds around features and corners, this is not just cutting back vegetation. Creating a safe racecourse requires much deeper excavation of soil, and creation of high berms.
4. During use, high speeds of riders result in more traction on the soil, and that widens the track well beyond its original profile.
5. The "mountain" aspect of this use (elevation) involves even greater impacts by racers to soil and nearby vegetation when travel is downslope.
6. Many additional side trails need to be constructed for emergency use during racing practise and events, increasing the area of environmental damage .
7. The racing event requires special features and the installation of structures to challenge riders, such as rock gardens, jumps, wall rides, bridges, switch-backs, etc. This involves more environmental alterations and trampling of vegetation, during construction and use.
8. During a race event, there is heavier use of the trails and adjacent land due to event personnel.

This is not passive use.

Consider also that the plan is for the racecourse to remain in use in the post-Games legacy period, with the likelihood that further trail expansion will continue. The effects we just mentioned will be permanent, so there will not be the environmental restoration that permit regulations require. Added to these permanent effects from standard mountain bikes will be effects from extensive use of motorized vehicles on the trails (electric mountain bikes are very common). These are heavier, faster, noisier and more powerful than non-motorized mountain bikes and have the potential to cause both more damage and more danger to the public on the trails. Will the NPCA permit such motorized vehicles to use the trails? If not, how will any prohibition be enforced?

A racecourse cannot be considered passive under regulations because it involves significant and permanent alterations to the ravine ecology, including inevitable loss of wildlife. This devastation should preclude the issuance of a permit. By issuing a permit you are setting a clear precedent that reduction in tree canopy, increase in erosion and slope instability, loss of biodiversity, and intrusion of motorized vehicles into “protected” areas are all acceptable. They are not.

It has been suggested by the City of St. Catharines and the Games that the new trails are beneficial, for the following reasons:

1. *They are needed for the Games.* The 2022 mountain bike race is a tiny event of about 80 mountain bikers, lasting only a few days. In fact, it is amazing to us that the Games and the City are willing to risk allowing mountain bike racing in the ravine. The Riverview ravine is not a good location and possibly the worse choice among many alternatives where existing, established trails have been used for decades. In the current location most of the proposed track faces north, so trails are always wet, muddy and slippery. The soil is extensively undermined by flowing water and is geologically unstable. There are large sinkholes and degrading culvert systems. Other locations do not have these major problems. In fact, we believe that the reason that the Riverview ravine was chosen for the racecourse was to service the wishes of the City and OPG that the area become a permanent site for competitive mountain biking. The Games were just an excuse. It is worth noting that this location is not easy to access or monitor, therefore much of the required racecourse development can be done with little public scrutiny.
2. *More trails are available for the community.* The community does not need more mountain bike trails. There are plenty already. Also, the sensitive ecosystem of a forested urban ravine can only accommodate a limited number of trails and people. We need to increase tree canopy, not destroy it. Most of the racecourse trails are being constructed in areas with wildlife habitat and movement corridors for many protected species. Wildlife will either not survive or leave. The effects on the ecosystem in the Riverview ravine will extend into the broader ecosystem of the entire 12 Mile Creek.

Further, the creation of this type of “challenging” trail limits public access. These new trails are built for competitive riding. Heavy man/machine vehicles will be moving fast on these trails. Some of these vehicles will be motorized. A casual dog walker will be taking life in hand by venturing onto the racecourse. Construction of this racecourse is the very definition of an elitist project. It creates a facility for a small, privileged group of thrill seekers that does not include

the general public. The result of this type of action has been and will be “trail wars”, confrontation between mountain bikers and other trail users. These have occurred all over the world, including Canada, and some have been violent. Permitting the construction of this racecourse has the potential to destroy the harmony between casual cyclists and other trail users.

3. *The ravine will be better off because the trail builders will continue their trail maintenance work after the Games.* This is puzzling. What is the purpose of maintaining an area that is being destroyed by the very activity you are maintaining. The trail maintainers would be welcome to curate the ravine, if that was their purpose. It is not. Their purpose is the maintenance of “their racing trails”, which are far more damaging to the ravine than any bits of garbage or downed trees.

There are powerful interests and egos at work here, and lack of due care in execution. In particular, the mountain bikers want to expand their trail network and are willing to provide free construction labor in exchange for having long term access to the new trails. It would be bad enough if this was a professional trail builder working with the City and the Games to ensure that any legacy use of the trails would be managed. That is not what is happening. The trails are being built by a group of well-meaning amateurs in contravention of many of the guiding principles established by the International Mountain Bicycling Association. There was no environmental assessment. There is no committed funding for long term trail management. The community has been minimally involved. There is no plan or funding for security on the slopes, for liability coverage, for environmental restitution. Not only are these trails being built in the wrong area, but they are also being built by the wrong people and in the wrong way.

If we allow the permit for the racecourse to set a precedent, we will be stating that the cutting of tree roots, undermining of leaning trees, destruction of vegetation, relocation of rocks and displacement of soil, are all acceptable in an urban ravine. We will be creating a definition of passive use that accepts these activities despite the negative effects. Limits must be set so that “passive use” has real meaning.

We would also be stating that recreational use that is today considered “active” (high impact racing) will in the future be seen as an acceptable option in NPCA regulated urban ravines which currently allow passive use only (hiking, bird watching, some cycling). Conservation and other areas in Ontario are already having serious problems with the proliferation of mountain bike trails.

The Twelve Mile Creek and its ravines are part of the Niagara Region Peninsula Watershed. As stated by NPCA in its materials, this watershed is a natural treasure of distinct cultural, geological, hydrological, and biological aspects not found elsewhere in North America. It is part of the Carolinian life zone – the most biodiverse and threatened ecoregion in Canada.

In light of these facts, we ask the NPCA and its Board to reconsider its position regarding a permit for building this racecourse. Urban ravines are collapsing in part because there are so many ways to exploit them. Let’s set an example in reinforcing that conservation, preservation and restoration are essential to urban ravine survival, especially in these times of climate change. This is a “better way” for the community, for the ravine, and also for the City and the Games.

We attach a few photos showing some areas of the ravine before, during, and after racecourse construction. We would be happy to provide you and the Board with further information. We will be

posting additional photos and information on our website, which we hope to have operational next week.

We would also like the opportunity to be directly involved with discussions going forward with the Games, the City, OPG, Canada Cycling and the NPCA, in all matters regarding current and future developments of the 12 Mile Creek valleyland for purposes of the trail system, and the preservation of this unique environment.

Best regards,

FRIENDS OF 12 MILE CREEK

Example of before and after pictures --- August 2021 --- September 2021



Example of before and after pictures --- August 2021 --- November 2021



