

Environmental and Ecological Planning Advisory Committee

Report

6th Meeting of the Environmental and Ecological Planning Advisory Committee
August 19, 2021
Advisory Committee Virtual Meeting - during the COVID-19 Emergency

Attendance PRESENT: S. Levin (Chair), L. Banks, A. Bilson Darko, A. Boyer, S. Esan, P. Ferguson, S. Hall, S. Heuchan, B. Krichker, B. Samuels, S. Sivakumar, R. Trudeau and I. Whiteside and H. Lysynski (Committee Clerk)
 ABSENT: I. Arturo, L. Grieves, J. Khan, I. Mohamed, K. Moser and M. Wallace
 ALSO PRESENT: C. Creighton, J. MacKay, B. Page, M. Pease and M. Schulthess
 The meeting was called to order at 5:00 PM

1. Call to Order

1.1 Disclosures of Pecuniary Interest

That it BE NOTED that no pecuniary interests were disclosed.

2. Scheduled Items

2.1 Homeowner Information Brochure

That a Working Group BE ESTABLISHED consisting of S. Hall, S. Heuchan, S. Levin (lead), B. Samuels and R. Trudeau, with respect to the homeowner brochure for property owners leaving near natural areas; it being noted that the Environmental and Ecological Planning Advisory Committee reviewed and received the attached presentation from B. House and J. Irving, students, with respect to this matter.

3. Consent

3.1 5th Report of the Environmental and Ecological Planning Advisory Committee

That it BE NOTED that the 5th Report of the Environmental and Ecological Planning Advisory Committee, from its meeting held on June 17, 2021, was received.

4. Sub-Committees and Working Groups

4.1 Climate Emergency Action Plan

That the following Climate Emergency Action Plan Working Group recommendations BE FORWARDED to the Civic Administration for consideration:

a) a special advisory committee should be created to actively participate in the Climate Emergency Action Plan development and implementation. The committee should consist of representation from the City's Climate Emergency Action Plan team, representatives from advisory committees including EEPAC, First Nations and politicians. The committee structure will facilitate continuous, long-term consultation with key stakeholders and involvement of expertise available to the City through its advisory committees;

b) the impacts of climate change to the Natural Heritage System should be prioritized and considered holistically, not as an add-on to anthropocentric objectives; plans to protect and enhance the Natural Heritage System under climate change conditions should be explicitly included in the Climate Emergency Action Plan;

c) the Natural Heritage System should be fully harnessed as part of the City's approach to climate change mitigation, such as the sequestration of carbon by existing green spaces including wetlands, prairies, meadows, forests and mature woodlots, etc. (not only via tree plantings), management of stormwater under extreme weather events and vegetative cover to provide evapotranspiration, reduced temperatures and reductions in runoff and flooding;

d) to recognize the potential utility of the Natural Heritage System for climate change mitigation, we must better understand current baseline conditions. To begin, EEPAC recommends that the City assemble and present existing baseline data to EEPAC to support the quantification of carbon sequestration by the Natural Heritage System, as well as inventory of the amounts and quality of wetlands, woodlots and other natural lands currently remaining within the City of London. Only with baseline data can an effective and successful Climate Emergency Action Plan with specific targets and accountability be achieved. Using this baseline data, the impacts of climate change on the Natural Heritage System should be modeled under various warming scenarios (e.g., using Global Circulation Models). Further, models could be used to predict the extent to which local climate change effects can be mitigated by Natural Heritage features (e.g., quantifying carbon sequestration and stormwater absorption by green spaces);

e) a framework should be developed to systematically monitor the impacts of climate change on the Natural Heritage System over time, with checkpoints to assess whether the City is on track to meet its climate targets and determine if further measures are warranted; and

f) the role of EEPAC in the further development and implementation of the Climate Emergency Action Plan should be clarified. EEPAC wishes to remain involved in consulting with and supporting the City on the implications of the Climate Emergency.

5. Items for Discussion

5.1 Light Pollution Relating to Bird Friendly Skies

That a Working Group consisting of P. Ferguson, L. Grieves and B. Samuels BE ESTABLISHED to light pollution as it relates to London's Bird Friendly Skies program; it being noted that the Environmental and Ecological Planning Advisory Committee reviewed and received a communication dated August 13, 2021, from B. Samuels, with respect to this matter.

5.2 2331 Kilally Road and 1588 Clarke Road

That it BE NOTED that the Notice of Planning Application to revise the application for Draft Plan of Subdivision, Official Plan and Zoning By-law

Amendments relating to the properties located at 2331 Kilally Road and 1588 Clarke Road, dated July 6, 2021, from L. Mottram, Senior Planner, was received.

5.3 (ADDED) Western Road and Sarnia Road / Philip Aziz Improvements
MCEA - Project Restart

That it BE NOTED that the Notice of Study Restart dated August 16, 2021, relating to the Western Road and Sarnia Road/Philip Aziz Avenue Improvements Municipal Class Environmental Assessment, was received.

6. Adjournment

The meeting adjourned at 6:30 PM.

The next meeting of the Environmental and Ecological Planning Advisory Committee will be held on September 23, 2021



LIVING
ADJACENT
TO
NATURAL
FEATURES

*EEPAC
Presentation*

August 19th, 2021

OUR CHALLENGE

Reach out to Conservation Authorities, Municipalities, and Developers to understand what is provided to Homeowners Living Adjacent to Natural Heritage Features

WHAT OTHERS ARE DOING

Different priorities for different areas

- Southern Ontario: more emphasis on wetland protection, rarity because of development
- Northern Ontario: still need for protection but more common

Toronto

- concerns with bird collision deterrence
- *An Enduring Wilderness: Toronto's Natural Parklands* coffee table book
 - Neighbourhood association presentations of book and city Natural Heritage regulations
- Ravine and Natural Heritage Regulations

Guelph

- General Environmental policies

Ottawa

- Focus on species at risk native to the area

WHERE LONDON STANDS

Good protection policies, adaptable

New environmental management policies for developers based on new standards: calling for greater buffering/setbacks

Unique priority of targeting homeowners living near Natural Heritage Features

AREAS FOR IMPROVEMENT

When protecting Natural Heritage Areas, often encroachment has already occurred following development, policies are acquired too late

Although homeowners are given brochures with information, research has not been done to measure their effectiveness

No guarantee that original homeowners will pass on information received to next owner

With COVID-19, it is no longer just those living nearby encroaching Natural Heritage Areas

Maintaining the "City's side of the fence", homeowners only able to maintain their side of the fence

SUGGESTIONS FOR THE PUBLIC

Recognizing and targeting groups of concern

- Ex. Teens, best channels to provide information (ex. School, extracurricular organizations, Youth programs)
- Dog and Cat Owners
- Cyclists

Enforcement

- Auditing those who live nearby and abuse ESA

Guided Walks: "you can't appreciate natural areas if you can't go in"

- In-person with guide
- Social media through video
- QR Codes?

Pop-up Events and Booths at Local Events

Interpretive Signage, showing features of ESA rather than simple 'Don't do this' signs

SUGGESTIONS FOR DEVELOPERS

Reinforcement of Guidelines and Monitoring

- Are recommendations made through EISs being followed through?

Restrictions for adjacent properties should be outlined in a purchase agreement and buyers should be informed before purchase

Educating building and real estate community

Environmental and Ecological Planning Advisory Committee

Report

The 5th Meeting of the Environmental and Ecological Planning Advisory Committee
June 17, 2021

2021 Meeting - Virtual Meeting during the COVID-19 Emergency

Please check the City website for current details of COVID-19 service impacts.

Meetings can be viewed via live-streaming on YouTube and the City website

Attendance PRESENT: S. Levin (Chair), I. Arturo, L. Banks, A. Bilson Darko, A. Boyer, S. Esan, S. Hall, B. Krichker, K. Moser, B. Samuels, S. Sivakumar, R. Trudeau and I. Whiteside and H. Lysynski (Committee Clerk)

ABSENT: P. Ferguson, L. Grieves, S. Heuchan, J. Khan and M. Wallace

ALSO PRESENT: C. Creighton, K. Edwards, C. Saunders, M. Schulthess and E. Williamson

The meeting was called to order at 5:00 PM

1. Call to Order

1.1 Disclosures of Pecuniary Interest

That it BE NOTED that no pecuniary interests were disclosed.

2. Consent

2.1 4th Report of the Environmental and Ecological Planning Advisory Committee

That it BE NOTED that the 4th Report of the Environmental and Ecological Planning Advisory Committee, from its meeting held on May 20, 2021, was received.

3. Sub-Committees and Working Groups

3.1 Advisory Committee Review

That the following recommendations of the Environmental and Ecological Planning Advisory Committee, with respect to the Advisory Committee Review and draft Terms of Reference Report dated May 17, 2021, BE PROVIDED to the Governance Working Group for consideration:

- a) the reduction in membership to 19 is supported;
- b) quorum as a requirement for committee business be maintained;
- c) the existing Terms of Reference be maintained with one alteration highlighted below:

Add to the existing mandate:

“to provide advice on any global (e.g climate change), regional or local issue related to the long-term sustainability of the Natural Heritage System.”;

- d) the existing name be maintained;

- e) as the technical expertise needed is sometimes hard to obtain, term limits may not be suitable;
- f) this could be addressed by one or more of the following:
 - i) no term limits;
 - ii) three council cycles (12 year limit); and,
 - iii) current limit be continued but extensions be permitted on the advice of the Chair;
- g) given the specialized knowledge required for membership:
 - i) the City be asked to circulate application information to the relevant Department Chairs at Western University and Course Coordinators at Fanshawe. The Chair and Vice Chair can provide assistance in identifying the appropriate contacts; and,
 - ii) the information circulated include a contact name from EEPAC so that potential applicants can ask questions about membership prior to applying;
- h) in the selection process, consideration be given to asking the current Chair and Vice Chair for assistance.

3.2 Arva Pumping Station to Huron Street Water Transmission Main EIS

That the Arva Pumping Station Working Group comments, appended to the Environmental and Ecological Planning Advisory Committee Agenda, BE FORWARDED to the Civic Administration for consideration.

4. Items for Discussion

4.1 Climate Emergency Action Plan

That a Working Group BE ESTABLISHED consisting of A. Boyer, S. Hall, B. Krichker, K. Moser, B. Samuels and I. Whiteside, with respect to the Climate Emergency Action Plan; it being noted that the Environmental and Ecological Planning Advisory Committee reviewed and received the Discussion Primer for the Climate Emergency Action Plan - 2020.

5. Adjournment

The meeting adjourned at 5:17 PM.

July 31, 2021

To the Climate Emergency Action Plan Team,

In June 2021, the Environmental and Ecological Planning Advisory Committee (EEPAC) was asked by the City of London to provide feedback on a discussion primer for the Climate Emergency Action Plan (CEAP). EEPAC formed a working group that convened over two meetings to discuss matters concerning the impacts of climate change on the Natural Heritage System.

A spreadsheet containing the comments produced by the EEPAC working group is enclosed with this letter, with comments corresponding to specific sections of the Climate Emergency Action Plan. In summary, the working group was somewhat unclear on the role that EEPAC is being asked to assume at this stage in the development of the Plan, but the working group felt that EEPAC could serve an important role moving forward into subsequent stages of the Plan's development and implementation.

EEPAC recommends the following:

1. A special advisory committee should be created to actively participate in the Climate Emergency Action Plan development and implementation. The committee should consist of representation from the City's Climate Emergency Action Plan team, representatives from advisory committees including EEPAC, First Nations and politicians. The committee structure will facilitate continuous, long-term consultation with key stakeholders and involvement of expertise available to the City through its advisory committees.
2. The impacts of climate change to the Natural Heritage System should be prioritized and considered holistically, not as an add-on to anthropocentric objectives; plans to protect and enhance the Natural Heritage System under climate change conditions should be explicitly included in the Climate Emergency Action Plan.
3. The Natural Heritage System should be fully harnessed as part of the City's approach to climate change mitigation, such as the sequestration of carbon by existing green spaces including wetlands, prairies, meadows, forests and mature woodlots, etc. (not only via tree plantings), management of stormwater under extreme weather events and vegetative cover to provide evapotranspiration, reduced temperatures and reductions in runoff and flooding.
4. To recognize the potential utility of the Natural Heritage System for climate change mitigation, we must better understand current baseline conditions. To begin, EEPAC recommends that the City assemble and present existing baseline data to EEPAC to support the quantification of carbon sequestration by the Natural Heritage System, as well as inventory of the amounts and quality of wetlands, woodlots and other natural lands currently remaining within the City of London. Only with baseline data can an effective and successful Climate Emergency Action Plan with specific targets and accountability be achieved. Using this baseline data, the impacts of climate change on the Natural Heritage System should be modeled under various warming scenarios (e.g., using Global Circulation Models). Further, models could be used to predict the extent to

which local climate change effects can be mitigated by Natural Heritage features (e.g., quantifying carbon sequestration and stormwater absorption by green spaces).

5. A framework should be developed to systematically monitor the impacts of climate change on the Natural Heritage System over time, with checkpoints to assess whether the City is on track to meet its climate targets and determine if further measures are warranted.
6. The role of EEPAC in the further development and implementation of the Climate Emergency Action Plan should be clarified. EEPAC wishes to remain involved in consulting with and supporting the City on the implications of the Climate Emergency Action Plan for London's Natural Heritage Systems.

EEPAC would welcome meeting with City staff to explore additional opportunities to be involved with further work on the Climate Emergency Action Plan.

Thank you for your consideration.

EEPAC Climate Emergency Action Plan Working Group

ID	Type	CEAP section	Staff response?	Feedback	Sources
1	Comment	N/A		In general, the description of the CEAP seems overly anthropocentric (concentrated on human dimensions of climate change) and doesn't account for cumulative impacts of human activity in the City of London under climate change to the Natural Heritage System, particularly to Environmentally Significant Areas and to Species at Risk. Language should be added to the CEAP to acknowledge the ecological importance of conserving the indigenous landscape on which London is built.	
2	Question	N/A		What is EEPAC's role in the further development and implementation of the CEAP following the discussion primer phase? Will EEPAC have an opportunity to review a draft of the CEAP, including plans for implementation, before being finalized?	
3	Question	N/A		How does the CEAP intersect with other guiding documents such as the official London Plan and the updated Environmental Management Guidelines?	
4	Question	N/A		Who serving on the Climate Emergency Action Plan team is responsible for matters concerning natural heritage?	
5	Comment	N/A		Experts are required to help provide data and necessary resources for designing and implementing plans effectively and quickly. This could include experts from institutions such as Western University and environmental consulting companies. EEPAC could help to contribute to sourcing relevant expertise.	
6	Comment	N/A		A special advisory committee should be created to actively participate in the Climate Emergency Action Plan development and implementation. The committee should consist of representation from the City's Climate Emergency Action Plan team, representatives from advisory committees including EEPAC, First Nations and politicians. The committee structure will facilitate continuous, long-term consultation with key stakeholders and involvement of expertise available to the City through its advisory committees.	
7	Comment	N/A		The CEAP must address four main interconnected topics for conserving natural heritage: ecological conditions, development, gas emissions, water resources.	
8	Comment	N/A		London should follow the example of the Waterloo Region Climate Action Strategy which contains real, concrete objectives.	https://www.engagewr.ca/waterloo-regions-climate-action-strategy
9	Comment	How We Green, Actions 1-2		We need to define the anticipated effects of climate change on natural heritage. For example, increased extreme hydrologic events will increase flooding and have serious impacts on land, property and people. The resulting overflow will increase the transport of nutrients and contaminants to river systems. Plans for mitigation	

10	Question	How We Green, Actions 1-2		What is the practical significance of distinguishing between natural heritage (NH) in urban and rural areas?	
11	Question	How We Green, Actions 1-2		Measures to improve resilience in rural and urban areas need to be more clearly defined. What is resiliency? We recommend including a clear definition. This would allow 'resiliency targets' to be measured and evaluated.	
12	Question	How We Green, Action 2		It is unclear what is meant by NH resiliency in rural areas. For example, does this refer to actions like preventing agricultural runoff from croplands entering the Thames River and its tributaries, keeping watersheds and waterways/water bodies clean through proper watering & fencing systems for livestock, preventing/minimizing drainage of wetlands for agriculture, other, or all? These points should be made explicit for both rural and urban resiliency.	
13	Comment	How We Green, Action 3		To measure change and model possible warming scenarios, we need to start with an assessment of baseline (existing) conditions - including canopy coverage, carbon sequestration by natural heritage, how many wetlands exist in London, what condition they're in, and the area of land they cover, etc. EEPAC can suggest how to identify these baseline conditions; a framework could be developed by assembling and organizing the City's already available/applicable information from various sources such as the London Plan and supporting documentation. Completed studies may include, but not be limited to: Class Environmental Assessments, Environmental Impact Studies and Subwatershed Studies; and various completed (ecological terrestrial and water quality) monitoring programs. Documentation of baseline conditions should include, but not be limited to, Natural Heritage System inventories, environmental/ecological conditions, terrestrial and water resources encompassing the Natural Heritage System, major functions performed by the Natural Heritage System, individual features of environmental/ecological systems, overall system conditions and health. All this information is very important and critical for the City to be able to accurately measure, compare, report and mitigate the effects of climate change on the Natural Heritage System. Where data are deficient, EEPAC may recommend further studies be undertaken.	
14	Comment	How We Green, Action 3		We do not necessarily require another land use study to model carbon sequestration, which could take several years. Sufficient data on land uses might already exist. Instead, we should begin by focusing on consolidating and using data we already have to inform targeted planting and conservative land use towards a goal of improving sequestration city-wide. e.g., ensuring the city has adequate minimum forest cover +/- planting plans to meet minimum standards by a certain date (2025? 2030?). This could save money and also help the City meet climate goals sooner.	

15	Question	How We Green, Action 3		What is our baseline CO2 carbon budget? How will increasing natural landscapes and ecosystems increase CO2 sequestration? To be successful in meeting our reduction of GHGs we need an understanding of the London carbon budget today (baseline) and where additional reductions in CO2 can be made. High impact actions should be prioritized based on available data.	
16	Comment	How We Green, Action 3		The natural heritage system provides other benefits for climate change mitigation beyond CO2 sequestration. For example, increased vegetated cover will also increase evapotranspiration and reduce temperatures. Increased vegetation cover can reduce runoff and flooding. These additional benefits should be considered and evaluated in the CEAP.	
17	Comment	How We Green, Action 3		<p>“Green features” - wetlands, woodlots, etc. should be assessed for carbon sequestration and land cover cumulatively, not separately. Metrics should include any and all ecological and environmental features within and, if possible, outside the Natural Heritage System (e.g. agricultural lands). To support this, the City should take inventory of different land cover types to establish baseline conditions. Note that quantifying sequestration by different cover types may require different protocols or parameters.</p>	<p>An Analysis of Present and Future Carbon Storage in the Forests of the Credit Valley Watershed (2010) https://cvc.ca/wp-content/uploads/2011/01/CVC-CarbonStudyFinal.pdf</p> <p>Wetland Mapping in Ontario's Boreal Forest (2018) https://boreal.ducks.ca/wetland-mapping-boreal-forest/</p>

18	Comment	How We Green, Action 3		<p>For modeling various scenarios under warming conditions, look at Global Circulation Models including parameters such a weather conditions, changes in temperature, environmental conditions, the extent of the natural heritage system. These models could be applied at a City-wide level.</p>	<p><u>The State-of-the-Art of Urban Climate Change Modeling and Observations (2020)</u> https://link.springer.com/article/10.1007/s41748-020-00193-3#Sec7 <u>Ontario Climate Data Portal</u> https://lamps.math.yorku.ca/OntarioClimate/ <u>Presentation: High Resolution Regional Climate Modelling in Support of Climate Change Adaptation in Ontario (2018)</u> http://www.climateontario.ca/doc/RAC2018-2021/JohnLiu-Webinar-2018September6_FINAL.pdf</p>
19	Comment	How We Green, Action 4		<p>The CEAP's focus on the natural heritage system's contribution to CO2 sequestration seems to be specific to only trees. The CEAP must account for meadows, tall grass prairie, wetlands etc. that also sequester carbon. Language in the CEAP could be made more inclusive, and additional measures could be added to factor in the roles of natural landscapes besides forest.</p>	
20	Question	How We Green, Action 4		<p>Are changes to the urban forest strategy being considered in light of climate change? Will the Urban Forest Strategy be implemented as it is currently written?</p>	

21	Question	How We Green, Action 4		When qualifying "under-utilized agricultural land", should consider whether the land is arable. The City of London has an Urban Agriculture policy and part of which includes using unused agricultural land for urban agriculture. How would reforestation dovetail with this policy?	
22	Question	How We Green, Action 4		Does "under-utilized agricultural land" include agricultural land within the urban growth boundary slated for development? If so, what would be the effects of cutting down the trees when the land is developed? What involvement of development companies is proposed as part of the CEAP? As significant landowners, they should be included.	
23	Comment	How We Green, Additional Actions		In light of climate change altering growing conditions for plantings, the City should revise its list of approved plantings to include ONLY native species that will tolerate increasingly extreme conditions (e.g., drought, flooding). There are numerous species currently approved for city plantings that are classified as introduced/invasive and create needless competition with native species. The City should consult advisory committees and local ecological authorities (e.g., UTRCA, Reforest London, Thames Talbot Land Trust) about shifting species ranges as a result of climate change when updating the list of approved plantings.	https://www.cbc.ca/news/canada/london/reforest-london-asks-city-halt-planting-invasive-species-1.4223182
24	Comment	How We Green, Additional Actions		London could use existing ecological inventory data already collected in EIS or EA work to produce biodiversity maps of the Natural Heritage System as a way of tracking habitat degradation and shrinkage, and preventing further loss of biodiversity.	
25	Question	How We Green, Action 5		This is vague; Which First Nations (FN) are participating, on what lands, and who is funding this work?	
26	Comment	How We Green, Action 5		Collaborating with FN should include Indigenous peoples living within the City of London, not just FN on reserves or outside the urban boundary.	
27	Comment	How We Green, Action 5		Effective collaboration requires relationship building. Does City of London currently have good relationships with First Nations in the region and if not, this must be addressed and remedied first and foremost (this is to say, are the foundations for successful collaboration in place? This is essential and may require additional consultation and engagement with FN, depending on FN communities' views of their current relationship with the City).	
28	Comment	How We Green, Action 5		EOPAC thinks that collaboration with First Nations is very important but the CEAP needs to be clear on how it will be implemented. We suggest that moving forward, implementation of the CEAP should include First Nation representation in this area to work together with EOPAC/other City committees to look for the best ecological restoration strategies to protect the natural heritage system.	

29	Comment	How We Green, Action 6		Should consider synergistic effects of human activities and climate change. For example, storm water ponds have become a popular way to treat stormwater. Periodically these ponds need to be cleaned. If precipitation increases, contaminants and nutrients entering these pools potentially increases. How will climate change affect maintenance requirements for these systems to protect the waterways? (e.g. cost, frequency of cleaning)	
30	Comment	How We Green, Action 6		To prevent significant property damage and liability, the City should identify new floodplain lines under climate change conditions and establish new, adequate buffers around those floodlines for proposed new developments and for proposed renovations/additions/rebuilds to existing developments near the Thames and its watershed. This should be a priority.	
31	Comment	How We Green, Actions 1, 2, 6		The City should adhere to floodplain lines based on the 100 and 250 year storm (regional storm) when approving development	
32	Comment	How We Green, Action 6		Plan to pursue all necessary updates to floodplain lines and infrastructure per existing subwatershed studies within a period of approximately 5 years, including Dingman Creek Subwatershed Study.	
33	Comment	How We Green, Action 6		Riparian zones should be restored, maintained, enhanced & managed wherever possible to mitigate flooding.	
34	Comment	How We Green, Action 6		Restrict expansion of existing impervious surfaces near the Thames; for example road and trail widening.	
35	Comment	How We Green, Action 6		Wastewater treatment plants in London are old and potentially deficient. In light of extreme rainfall events anticipated under climate change conditions, EEPAC supports upgrades to these facilities where needed per studies already undertaken by the City.	
36	Comment	How We Green, Action 6		All 6 wastewater treatment plants in London should assess anticipated impacts to their operations under climate change conditions as is being done currently at Adelaide and Greenway PPCP	
37	Comment	How We Green, Action 2, 6		Prevent drainage of swamps/wetlands wherever possible. Look into improving erosion control strategies and drainage of agricultural lands into local watercourses. Look at use of different vegetation types that can be used to remove chemicals from field runoff.	
38	Question	How We Grow, Actions 1-2		How will the CEAP be integrated with City policies for maintaining existing and approving new development? How will development proposals be viewed through a climate lens?	
39	Question	How We Grow, Actions 1-2		How will transportation links for new development be considered and implemented through a climate lens?	
40	Comment	How We Grow, Action 2-4		EEPAC recommends the use of bird friendly building design. The City has yet to adopt requirements for bird-friendly glass materials to be used in new site plans, but EEPAC recommends the City do so as soon as possible.	

41	Question	How We Move		Will road widening projects be viewed through a climate lens? (e.g. considering Scope 3 emissions as part of the impact of each project)	
42	Comment	How We Move		Charging infrastructure for electric vehicles needs to be made available city-wide (and must be adequate to service/support projected growth in electric vehicle usage).	
43	Comment	How We Move		Focus on public transportation improvements & development of active transportation infrastructure to reduce single-person vehicle use & thereby reduce emissions.	
44	Comments	How We Prosper		The current objective for 2050 is to reduce CO2 by 30% by sequestering CO2 and GHG emissions. How was this quantity justified? Is this enough? If it is, how do we do it as there is no technology yet available?	

2021-08-13

Hello Heather,

At the EEPAC meeting on August 19 I would like to discuss light pollution as it relates to London's Bird Friendly Skies program. I see that this has already been added to the agenda (item 5.1). I am writing to provide more context and information to be included in the agenda.

Background: Artificial light at night represents a major source of environmental pollution that impacts ecosystems and human health. Light pollution stems from existing and new development, particularly from light fixtures that cast light upwards at night producing skyglow. Skyglow elevates the risk of migratory birds colliding with windows on buildings. Artificial light at night also harms birds and other organisms locally when it spills or trespasses into natural areas.

The City of London is addressing light pollution through the Bird Friendly Skies program, including updates to the Site-Plan Control By-law. Section 8.2. of the bylaw, "Yard Lighting", includes the following: *"(d) Light Study – a qualified engineer will prepare and provide a report demonstrating how the lighting is contained on the site and that the selection/style of light will not create glare and/or broadcast light onto adjacent properties or roadways, by the adjustment of refractors and/or the placement of shields (see Figure 8.1)."*

In 2019 a delegation from Development Services gave a presentation to the Planning and Environment Committee about the Bird Friendly Skies program that included the above text and added: *"To ensure bird-friendly development, this tool can be used for larger developments which have the potential for significant light pollution."*

Questions: I have not been able to find any more information about the Light Study mentioned in this report. I am wondering if: 1) the City currently has a protocol for measuring light pollution locally (i.e. light trespass or spillage) as described above; 2) there exists quantitative data for London's light pollution on a city-wide scale (e.g. satellite imagery or standardized monitoring); 3) if the City has set targets for overall reduction in light pollution.

Proposal: I believe that in order to characterize and mitigate the effects of light pollution on London's Natural Heritage System, a valuable approach would be to first examine baseline conditions and then to monitor changes over time. I would like to propose that EEPAC forms a working group to research available methodology and standards for measuring and reducing light pollution. The working group could provide recommendations for developing a protocol for a Light Study and a framework to monitor the extent of light pollution in the City of London.

Thank you,

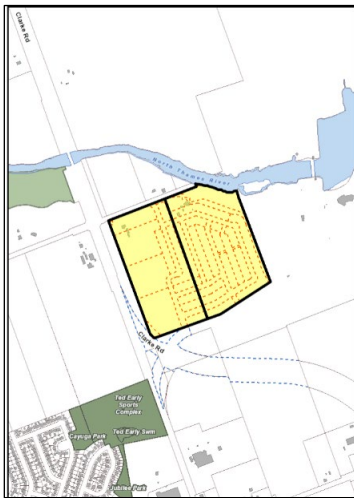
Brendon Samuels
Member, EEPAC



NOTICE OF PLANNING APPLICATION

Revisions to Application for Draft Plan of Subdivision, Official Plan and Zoning By-law Amendments

2331 Kilally Road and 1588 Clarke Road



File: 39T-20502 / OZ-9244

Applicant: Sifton Properties Limited

What is Proposed?

Draft Plan of Subdivision, Official Plan and Zoning amendments to allow:

- A residential subdivision consisting of low density single detached dwellings, medium density cluster dwellings, street townhouse dwellings, low-rise apartment buildings, parks, open spaces, multi-use pathways and stormwater management facility; served by five (5) local streets.



LEARN MORE & PROVIDE INPUT

Please provide any comments by **July 30, 2021**

Larry Mottram

lmottram@london.ca

519-661-CITY (2489) ext. 4866

Development Services, City of London, 300 Dufferin Avenue, 6th Floor,
London ON PO BOX 5035 N6A 4L9

File: 39T-20502 / OZ-9244

london.ca/planapps

You may also discuss any concerns you have with your Ward Councillor:

Councillor Mohamed Salih

msalih@london.ca

519-661-2489 ext. 4003

**If you are a landlord, please post a copy of this notice where your tenants can see it.
We want to make sure they have a chance to take part.**

Date of Notice: July 6, 2021

Application Details

Commonly Used Planning Terms are available at london.ca/planapps.

Requested Revisions to Draft Plan of Subdivision

A previous notice was given by mail on August 18, 2020 advising of the application for Draft Plan of Subdivision, Official Plan and Zoning By-law Amendments. Revisions to the proposed subdivision design have been submitted by the applicant and are summarized as follows:

- The subdivision's internal road network has been redesigned to shift the location of the southern access further west and outside of the Fanshawe Conservation Area lands;
- The northern entrance has shifted further west to allow for placement of a park block in the northeastern part of the subdivision;
- The low-density residential portions of the subdivision are shown as blocks rather than lots. The actual lots will be created through registration of future phases, or through a future application for exemption from part lot control;
- The proposed Stormwater Management (SWM) block has shifted to the west, with the proposed location generally aligning with the SWM block shown in the Kilally South, East Basin EA;
- The proposed Thames Valley Parkway (TVP) extension has been removed from the ESA buffer area, and now runs along Street C to avoid environmentally sensitive areas;
- The 15 metre parkland access block north of Street C has been removed and absorbed into Block 2; and,
- The proposed TVP extension now exits the subdivision at Clarke Road, rather than continuing onto Fanshawe Conservation Area lands.

Consideration of a Draft Plan of Subdivision consisting of 16 low density residential blocks (Blocks 1-16); five (5) medium density residential blocks (Blocks 17-21); two (2) park blocks (Blocks 22-23); two (2) blocks for Stormwater Management (SWM) Pond and Sanitary Pump Station (Blocks 24-25); two (2) road reserve blocks (Blocks 26-27); one (1) open space buffer block (Block 28); one (1) open space block (Block 29); serviced by five (5) local streets (Streets A, B, C, D, & E). (please refer to attached draft plan)

Requested Official Plan Amendments (please refer to attached map)

Possible Amendments to the (1989) Official Plan:

- Schedule 'A' – Land Use Map to change the land use designations from: "Urban Reserve – Community Growth", "Environmental Review", and "Open Space" to "Low Density Residential", "Multi-Family, Medium Density Residential" and "Open Space";
- Schedule 'B-1' – Natural Heritage Features Map to change the limits of the "Potential ESA" and "Max Hazard Line" delineations to reflect the findings of the Environmental Impact Study and Slope Stability Study; and,
- Schedule 'C' - Transportation Corridors Map to remove the "Proposed Future Arterial Road" delineation that applies to Kilally Road, approximately 200 metres east of Clarke Road.

Possible Amendments to The London Plan:

- Map 5 – Natural Heritage to revise the limits of the ESA to reflect the findings of the Environmental Impact Study (EIS) completed in support of the proposed Draft Plan of Subdivision application.

Requested Zoning By-law Amendment

Changes to the currently permitted land uses and development regulations are summarized below. The complete Zoning By-law is available at london.ca/planapps.

Requested Zoning (Please refer to attached map)

Possible Amendment to Zoning By-law Z.-1 to change the zoning from an Urban Reserve UR4 Zone, an Urban Reserve UR4/Temporary (T-56) Zone, a Holding Urban Reserve (h-2•UR4), and an Open Space OS5 Zone to:

- Residential R1 (R1-3) Zone – to permit single detached dwellings on lots with a minimum lot area of 300 square metres and minimum lot frontage of 10 metres;
- Residential R1 (R1-4) Zone - to permit single detached dwellings on lots with a minimum lot area of 360 square metres and minimum lot frontage of 12 metres;
- Residential R1 Special Provision (R1-4(21)) Zone – to permit single detached dwellings on lots with a minimum lot area of 360 square metres and minimum lot frontage of 12 metres, together with a special provision for a dwelling setback from a high pressure pipeline of 20 metres (minimum);

- Residential R1/Residential R4 Special Provision (R1-1/R4-6(*)) Zone – to permit single detached dwellings on lots with a minimum lot area of 250 square metres and minimum lot frontage of 9 metres, and to permit street townhouses with a minimum lot area of 145 square metres per unit and a minimum lot frontage of 5.5 metres per unit, together with a special provision for a lot coverage of 50 percent (maximum);
- Residential R5/Residential R6/Residential R7/Residential R8 (R5-7/R6-5/R7•H13•D75/R8-4) Zone – to permit such uses as townhouses and stacked townhouses up to a maximum density of 60 units per hectare and maximum height of 12 metres; various forms of cluster housing including single detached, semi-detached, duplex, triplex, fourplex, townhouse, stacked townhouse, and apartment buildings up to a maximum density of 35 units per hectare and maximum height of 12 metres; senior citizen apartment buildings, handicapped persons apartment buildings, nursing homes, retirements lodges, continuum-of-care facilities, and emergency care establishments up to a maximum density of 75 units per hectare and maximum height of 13 metres; apartment buildings, stacked townhouses, and lodging house class 2 up to a maximum density of 75 units per hectare and maximum height of 13 metres.
- Open Space OS1 Zone – to permit such uses as conservation lands, conservation works, golf courses, public and private parks, recreational buildings associated with conservation lands and public parks, campgrounds, and managed forests;
- Open Space OS1(3) Special Provision Zone – to permit conservation lands, conservation works, golf courses, public and private parks, recreational buildings associated with conservation lands and public parks, campgrounds, and managed forests, together with a special provision for no minimum lot frontage or minimum lot area requirement; and,
- Open Space OS5(3) Special Provision Zone – to permit conservation lands, conservation works, passive recreation uses which include hiking trails and multi-use pathways, and managed woodlots, together with a special provision for no minimum lot frontage or minimum lot area requirement.

An amendment to Subsection 4.21 of the Zoning By-law General Provisions is also requested to amend the street classification of Kilally Road, 200 metres east of Clarke Road, from a 'Proposed Arterial' to 'Local Road', and amend the road allowance limit as measured from the centre line from 18 metres to 10 metres to reflect existing conditions (the steep slopes and vegetation on the north side of Kilally Road will impede any road-widening plans), and to be consistent with the transportation network vision established in The London Plan.

The City may also consider applying holding provisions in the zoning to ensure adequate provision of municipal services, that a subdivision agreement or development agreement is entered into, and to ensure completion of noise assessment reports and implementation of mitigation measures for development in proximity to arterial roads.

An Environmental Impact Study (EIS) report prepared by AECOM, dated March 2020, and an Environmental Impact Study (EIS) Addendum, dated March 2021, were submitted with the application for draft plan of subdivision. The EIS reports are available by contacting the City's Planner listed on the first page of this notice.

Planning Policies

Any change to the Zoning By-law must conform to the policies of the Official Plan, London's long-range planning document. These lands are currently designated as "Urban Reserve – Community Growth", "Environmental Review" and "Open Space". The land use designations in the (1989) Official Plan are subject to possible amendment, as described above.

The subject lands are in the "Neighbourhoods" Place Type in The London Plan (Council adopted, approved by the Ministry with modifications, and the majority of which is in force and effect) permitting a range of housing including single detached dwellings, townhouses and low rise apartments; and "Green Space", permitting a range of public and private open space, parks, recreation, floodplain and conservation uses.

How Can You Participate in the Planning Process?

You have received this Notice because someone has applied for a Draft Plan of Subdivision and to change the Official Plan designation and zoning of land located within 120 metres of a property you own, or your landlord has posted the notice of application in your building. The City reviews and makes decisions on such planning applications in accordance with the requirements of the *Planning Act*. The ways you can participate in the City's planning review

and decision-making process are summarized below. For more detailed information about the public process, go to the [Participating in the Planning Process](#) page at [london.ca](#).

See More Information

You can review additional information and material about this application by:

- contacting the City's Planner listed on the first page of this Notice; or
- viewing the application-specific page at [london.ca/planapps](#).

Reply to this Notice of Application

We are inviting your comments on the requested changes at this time so that we can consider them as we review the application and prepare a report that will include Development Services staff's recommendation to the City's Planning and Environment Committee. Planning considerations usually include such matters as land use, development intensity, and form of development.

Attend a Future Public Participation Meeting

The Planning and Environment Committee will consider the requested Draft Plan of Subdivision, Official Plan and zoning changes on a date that has not yet been scheduled. The City will send you another notice inviting you to attend this meeting, which is required by the *Planning Act*. You will also be invited to provide your comments at this public participation meeting. The Planning and Environment Committee will make a recommendation to Council, which will make its decision at a future Council meeting. The Council Decision will inform the decision of the Director, Development Services, who is the Approval Authority for Draft Plans of Subdivision.

What Are Your Legal Rights?

Notification of Council and Approval Authority's Decision

If you wish to be notified of the Approval Authority's decision in respect of the proposed draft plan of subdivision, you must make a written request to the Director, Development Services, City of London, 300 Dufferin Ave., P.O. Box 5035, London ON N6A 4L9, or at developmentsservices@london.ca. You will also be notified if you provide written comments, or make a written request to the City of London for conditions of draft approval to be included in the Decision.

If you wish to be notified of the decision of the City of London on the proposed official plan amendment and zoning by-law amendment, you must make a written request to the City Clerk, 300 Dufferin Ave., P.O. Box 5035, London, ON, N6A 4L9, or at docservices@london.ca. You will also be notified if you speak to the Planning and Environment Committee at the public meeting about this application and leave your name and address with the Secretary of the Committee.

Right to Appeal to the Local Planning Appeal Tribunal

If a person or public body does not make oral submissions at a public meeting, if one is held, or make written submissions to the City of London in respect of the proposed plan of subdivision before the approval authority gives or refuses to give approval to the draft plan of subdivision, the person or public body is not entitled to appeal the decision of the Director, Development Services to the Local Planning Appeal Tribunal.

If a person or public body does not make oral submissions at a public meeting, if one is held, or make written submissions to the City of London in respect of the proposed plan of subdivision before the approval authority gives or refuses to give approval to the draft plan of subdivision, the person or public body may not be added as a party to the hearing of an appeal before the Local Planning Appeal Tribunal unless, in the opinion of the Tribunal, there are reasonable grounds to do so.

If a person or public body would otherwise have an ability to appeal the decision of the Council of the Corporation of the City of London to the Local Planning Appeal Tribunal but the person or public body does not make oral submissions at a public meeting or make written submissions to the City of London before the proposed official plan amendment is adopted, or before the zoning by-law amendment is passed, the person or public body is not entitled to appeal the decision.

If a person or public body does not make oral submissions at a public meeting or make written submissions to the City of London before the proposed official plan amendment is adopted, or before the zoning by-law amendment is passed, the person or public body may not be added as a party to the hearing of an appeal before the Local Planning Appeal Tribunal unless, in the

opinion of the Tribunal, there are reasonable grounds to add the person or public body as a party.

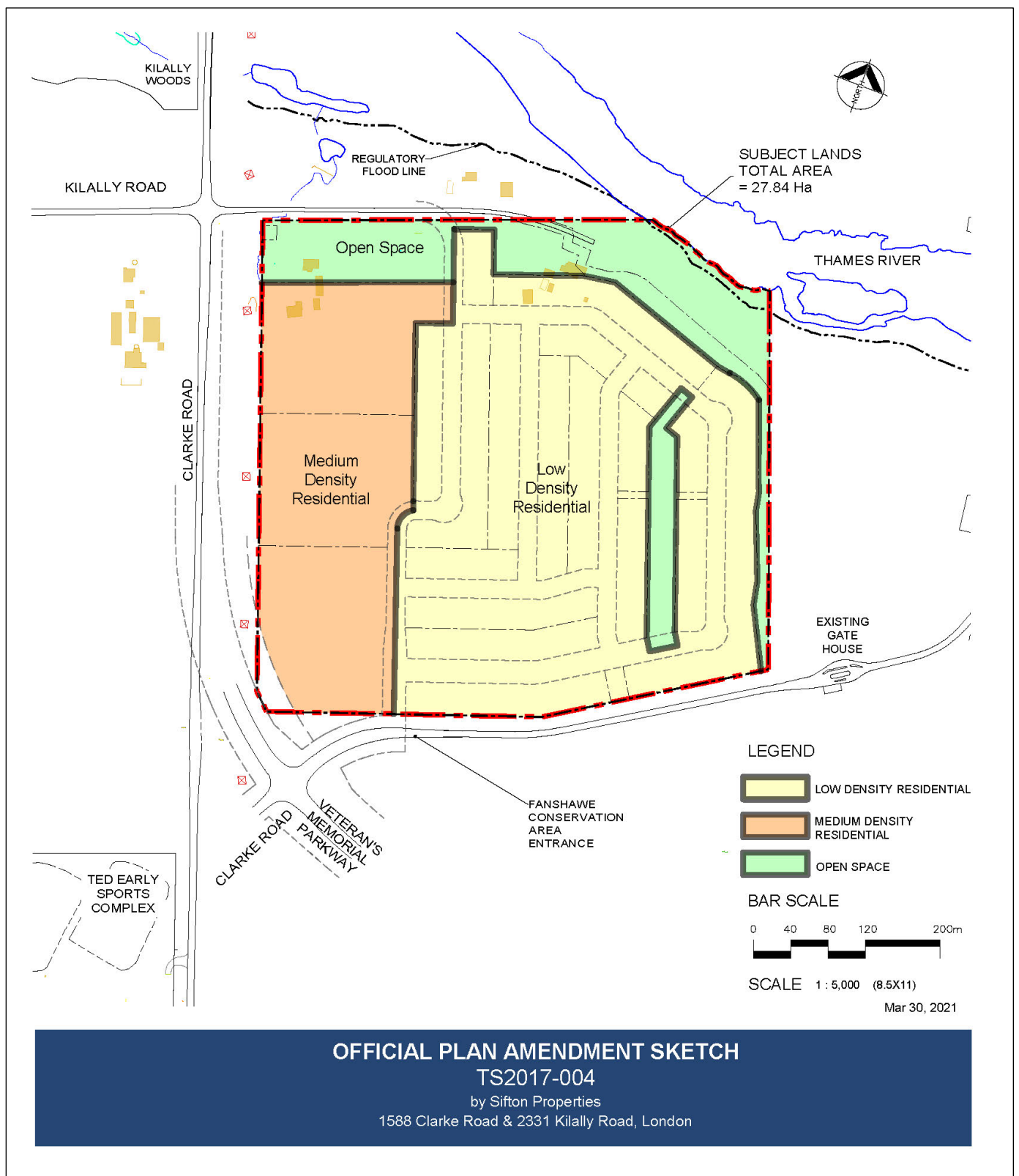
For more information go to <http://elto.gov.on.ca/tribunals/lpat/about-lpat/>.

Notice of Collection of Personal Information

Personal information collected and recorded at the Public Participation Meeting, or through written submissions on this subject, is collected under the authority of the *Municipal Act*, 2001, as amended, and the *Planning Act*, 1990 R.S.O. 1990, c.P.13 and will be used by Members of Council and City of London staff in their consideration of this matter. The written submissions, including names and contact information and the associated reports arising from the public participation process, will be made available to the public, including publishing on the City's website. Video recordings of the Public Participation Meeting may also be posted to the City of London's website. Questions about this collection should be referred to Cathy Saunders, City Clerk, 519-661-CITY(2489) ext. 4937.

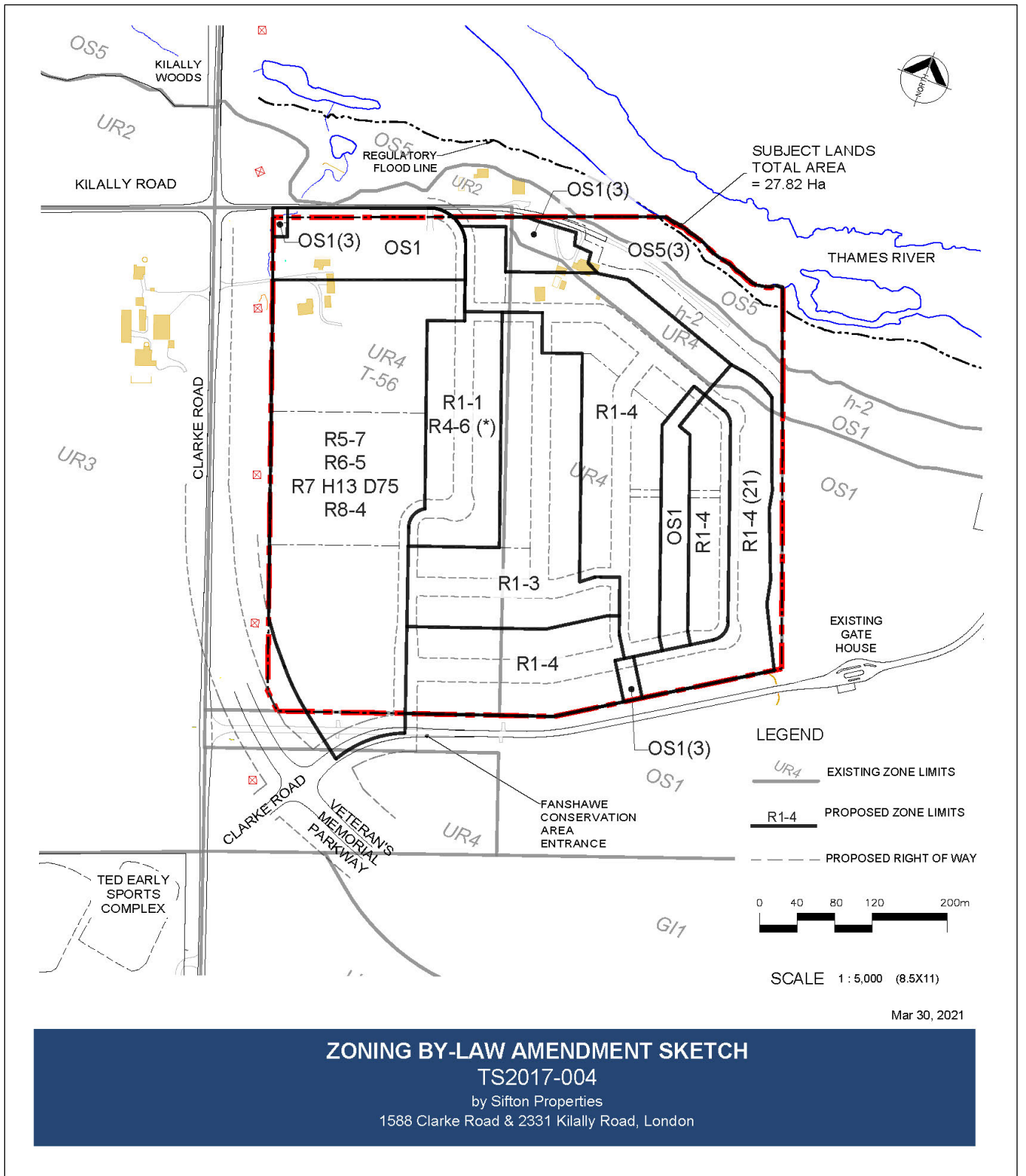
Accessibility – Alternative accessible formats or communication supports are available upon request. Please contact developmentsservices@london.ca for more information.

Requested Official Plan Designations



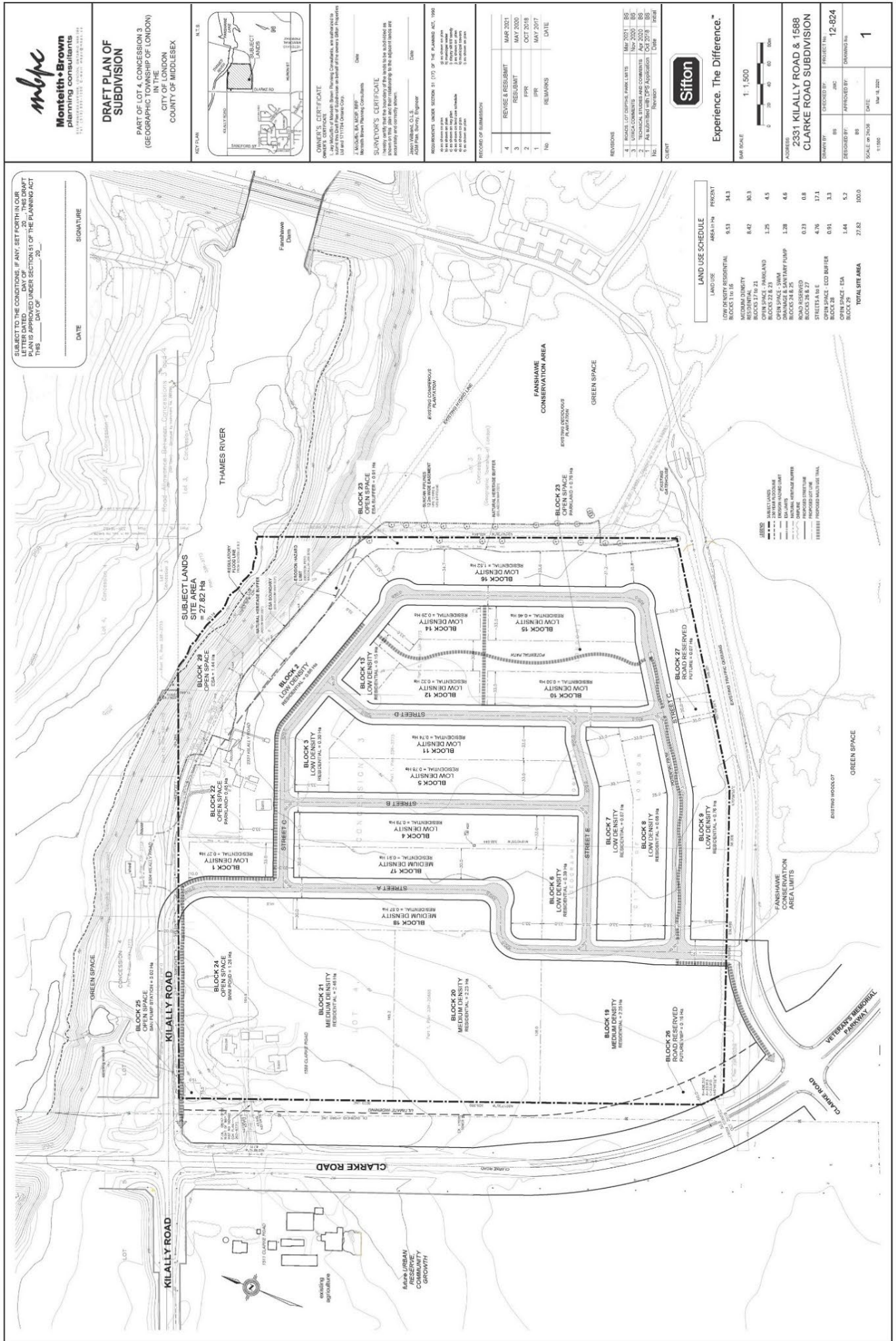
The above image represents the applicant's proposal as submitted and may change.

Requested Zoning



The above image represents the applicant's proposal as submitted and may change.

Requested Draft Plan of Subdivision



The above image represents the applicant's proposal as submitted and may change.

March 31, 2021



Development Services
City of London
300 Dufferin Avenue
London, ON
N6A 2L9

Attention: **Larry Mottram, Senior Planner, Development Services & Bruce Page, Manager, Development Services**

Our File #: 12-824

Reference: **Sifton Properties Limited
Responses to City of London and Upper Thames River Conservation Authority
Comments Regarding the Proposed Caverhill Subdivision (File #TS2017-004)
Official Plan & Zoning By-law Amendment and Draft Plan of Subdivision
2331 Kilally Road and 1588 Clarke Road**

Monteith Brown Planning Consultants (“MBPC”), on behalf of our client, **Sifton Properties Limited** (‘Sifton’) and in partnership with **AECOM**, is pleased to submit our response to comments received from the City of London, the Upper Thames River Conservation Authority (‘UTRCA’), the City of London Environmental and Ecological Planning Advisory Committee (‘EEPAC’), and members of the public for the proposed ‘Caverhill’ development at 2331 Kilally Road and 1588 Clarke Road (“the subject lands”). MBPC submitted applications on behalf of our client for amendments to the City of London 1989 Official Plan and the City of London Zoning By-law Z.-1 and Draft Plan of Subdivision approval for the subject lands in June 2020.

The intent of this letter is to respond to questions and comments from the following City departments and commenting agencies:

- Development Services, City of London;
- Stormwater Engineering and Design, City of London;
- Environmental and Ecological Planning Advisory Committee, City of London;
- Upper Thames River Conservation Authority;
- as well as members of the public.

A revised Draft Plan of Subdivision, Official Plan Amendment sketch, and Zoning By-law Amendment sketch are enclosed with this submission for the City’s review and comment, in advance of a Planning and Environment Committee meeting to consider the applications. We are looking forward to working with the City to move the applications forward to ensure our client obtains timely approvals for the proposed Draft Plan, Official Plan Amendment, and Zoning By-law Amendment.

SUBDIVISION DESIGN CHANGES

In response to comments received from the City of London and the UTRCA and internal discussions on how to optimize the site design, Sifton has made the following major changes to the proposed Draft Plan of Subdivision:

1. The subdivision's internal road network has been redesigned to relocate the southern access from the UTRCA-owned lands to the City-owned road allowance, as the UTRCA has indicated they are not supportive of a road connection onto their lands;
2. The northern entrance to the subdivision has been brought closer to the western property line, to allow for the placement of a parkland block on the northeast side of the site;
3. The low-density portion of the subdivision are shown as 'blocks' rather than lots. Lots may be created through the part-lot control process at a later date, to allow our client the flexibility to respond to shifts in market demand;
4. The proposed SWM block has shifted slightly to the west, and now extends to the western property line, with the proposed location generally aligning with the proposed location for the SWM block shown in the Kilally South, East Basin EA;
5. The proposed Thames Valley Parkway extension (TVP) has been removed from the ESA buffer area, and now runs along the proposed Street 'C' to avoid impacts on environmentally-sensitive areas;
6. The 15-metre parkland access block to the north of Street 'C' has been removed and absorbed into Block 2;
7. The proposed TVP extension now exits the subdivision at Clarke Road, rather than continuing onto UTRCA lands. It is expected that the UTRCA will be responsible for designing a TVP connection onto their property, to connect with the Fanshawe Conservation Area trails.

As a result of these revisions, the Draft Plan block sizes and numbering have changed from the previous submission, as identified in red on the list below:

- ~~Lots 1 to 164~~ **Blocks 1 to 16: Low-Density Residential, 7.98 Ha 9.53 Ha**
- ~~Blocks 165 to 174~~ **17 to 21: Medium-Density Residential, 10.9 Ha 8.42 Ha**
- ~~Blocks 172 to 174~~ **22 to 24: Open Space – Parkland, 1.37 Ha 1.25 Ha**
- ~~Blocks 175 & 176~~ **25 & 26: Open Space – Sanitary Pump Station and SWM Pond, 1.38 Ha 1.28 Ha;**
- **Blocks 27 & 28: Road Reserves, 0.23 Ha;**
- **Streets A to E: 4.76 Ha**
- ~~Block 177~~ **29: Open Space, ESA Buffer, 0.71 Ha 0.91 Ha**
- ~~Block 178~~ **30: Open Space, ESA, 1.44 Ha**
- ~~Streets A to D & Block 179 (VMP Extension): 4.06 Ha~~

The Official Plan and Zoning By-law Amendment sketches have also been updated to reflect the proposed changes to the Draft Plan of Subdivision, and a Parkland sketch has been provided to show the proposed parkland, ESA and ESA buffer land, and the proposed SWM pond area.

CITY OF LONDON COMMENTS

City of London Stormwater Engineering and Design

The Hydrogeological Assessment Report prepared by AECOM has been updated to include data from new monitoring wells that were installed across the site in 2018, as well as comments on the Kilally South, East Basin Environmental Assessment report that was completed by Blumetric. A copy of the updated Hydrogeological Assessment Report is enclosed with this submission.

City of London Development Services

The City's Ecological Planner has provided comments on the EIS prepared by AECOM in 2020 for the proposed subdivision, primarily addressing the proposed buffer, trail placement, and study methodology. Detailed responses to each comment are provided in the enclosed table, as well as an addendum to the EIS prepared by AECOM with more information on ecological buffers, management of parkland blocks, the

alignment of the multi-use trail, and infill planting. It is anticipated that a final EIS addressing the comments provided by the City of London Development Services will be included as a condition of Draft Plan approval. *Environmental and Ecological Planning Advisory Committee Comments*

EEPAC provided general comments and recommendations regarding the Environmental Impact Study prepared by AECOM to Sifton in September 2020. A detailed response from AECOM is enclosed with this submission, with the main issues addressed in brief in this letter.

Although EEPAC was concerned that the EIS did not reference the Kilally South, East Basin EIS and the Clarke Road Bridge EA, AECOM noted that the EIS prepared by North-South Environmental as part of the Kilally South, East Basin Municipal Class EA was not complete until September 2020, **after** the AECOM EIS was completed in March 2020. Notwithstanding, AECOM will prepare an updated EIS for the subject lands incorporating information from both studies.

EEPAC made several recommendations for how the EIS could be updated to address their comments and concerns. Brief responses to each recommendation are provided below, with more detail shown on the attached spreadsheet.

1. AECOM has clarified the recommended buffers and provided rationale for the buffer widths in the enclosed addendum. The buffers are predominantly 20 metres or more from the proposed ESA boundary (with the only exception of a small stretch in the southeast portion of the subject lands).
2. An Edge Management Plan can be part of implementation recommendations for detailed design.
3. It is noted that a permit from MECP will be required for the removal of barn swallow habitat.
4. It is noted that a UTRCA forester and UTRCA biologist should be consulting re: removal of barn swallow habitat.
5. It is noted that any change in land use must have a holding provision that requires a detailed environmental management plan that is produced in conjunction with the City plans for the SWM project which will proceed the development.
6. AECOM will review and consider the location of nesting structures in relation to foraging habitat.
7. It is agreed that any nesting structures must have capacity for a minimum of 20 nests.
8. The Environmental Monitoring Program/Plan will include monitoring of barn swallow structures.
9. AECOM will recommend the installation of signage for barn swallow structures to decrease disturbance and provide education
10. AECOM will consider including recommendations to rehabilitate the areas where an existing informal trail has resulted in compacted soils.
11. A requirement that all properties adjacent to the ESA buffer and setback be fenced without gates will be included as a condition of Site Plan Approval.
12. It is agreed that Homeowner's Packages should include a copy of the City's 'Living with Natural Areas' brochure.
13. AECOM has noted EEPAC's recommendation that if the City has not amended the delineation of the Kilally Forest ESA, it should be part of the change in land use and zoning related to this application
14. AECOM noted that EEPAC's request to be circulated on the proposed environmental management plan is at the discretion of the City of London.
15. AECOM agreed that the study design for monitoring be reviewed by the City and UTRCA as a condition of the development agreement.
16. AECOM will review the recommendations for lighting and noise impacts and clarify what the recommendations will be based on.
17. It is agreed that bird-friendly glass materials be used for homes along the ESA side of the development.
18. A direct entrance to the proposed subdivision from Clarke Road (versus Kilally Road) is not possible because the property does not have frontage on Clarke Road.
19. The EIS will be updated to address any potential impacts from the temporary pumping station at the northwest corner of the site.

UTRCA COMMENTS

UTRCA staff have provided comments on a number of studies submitted with this application, as well as comments reflecting their position as the owner of lands directly adjacent to the proposed Draft Plan of Subdivision. MBPC has coordinated with other members of the project team to provide responses to the comments on the technical studies and would also be pleased to coordinate a meeting with the UTRCA, as a landowner, to address any remaining concerns.

Environmental Impact Study

Detailed responses to the UTRCA's comments on the Kilally South, East Basin SWM Servicing Strategy, methodology, the proposed buffer and pathway, and indirect impacts of the proposed development are provided by AECOM in the enclosed table and EIS addendum.

Geotechnical/Slope Assessment

Our client has engaged Peto MacCallum Ltd. ('PML') to respond to the UTRCA's comments pertaining to the Slope Stability Assessment, and their response will also be provided to the City and the UTRCA once complete.

Hydrogeological Assessment & Water Balance Analysis

AECOM has updated the Hydrogeological Assessment to address the UTRCA's high-level comments.

Traffic Impact Assessment

Our client has engaged Paradigm Transportation Solutions Limited ('Paradigm') to update the Traffic Impact Assessment ('TIA') that was originally completed in July 2018 for the proposed subdivision, and this report will be submitted to the City once complete.

MEMBERS OF THE PUBLIC

The City has forwarded public comments from four people regarding the proposed application, who have questions regarding the Heritage Impact Assessment; the northern and southern access points; development timing; and impacts to the nearby active dairy farm. MBPC has provided responses to these comments in the attached table.

Summary

In support of this submission, please find enclosed:

- One (1) copy of a revised Draft Plan of Subdivision;
- One (1) digital CAD file of the Draft Plan tied to UTM coordinates;
- One (1) copy of a revised Official Plan Amendment Sketch;
- One (1) copy of a revised Zoning By-law Amendment Sketch;
- One (1) copy of a Parkland Sketch;
- One (1) copy of an Environmental Impact Study Addendum and revised Figure 8 prepared by AECOM;
- One (1) copy of a revised Hydrogeological Assessment Report (2021) prepared by AECOM;
- One (1) copy of a letter prepared by AECOM regarding public comments on the Heritage Impact Assessment; and
- One (1) copy of tables prepared by MBPC and AECOM with comprehensive responses to comments received thus far from the City of London, UTRCA, EEPAC, and members of the public.

We trust that the enclosed information is satisfactory to address the City, EEPAC, and UTRCA's comments at this time, and would be pleased to coordinate separate meetings with the City and the UTRCA (as an adjacent landowner) to review the revised Draft Plan. If you have any questions regarding this matter or require any additional information, please do not hesitate to contact me. We look forward to working with staff to continue to advance this application.

Respectfully submitted,

MONTEITH BROWN PLANNING CONSULTANTS



Jay McGuffin, MCIP, RPP
Vice President, Principal Planner
jmcguffin@mbpc.ca

JMc:hs

/enc

copies: Phil Masschelein, Sifton Properties Limited
Maureen Zunti, Sifton Properties Limited
Christine Creighton, UTRCA

Responses to EEPAC Comments on the Draft Plan of Subdivision File 9T-20502 - 2331 Kilally Rd and 1588 Clarke Rd.

GENERAL COMMENTS FROM EEPAC	RESPONSE FROM AECOM
<p>The lack of reference to the work done for the Kilally Basin EIS and the Clarke Road Bridge EA is a glaring fault with the report. Although it is clear the field work was done prior to those two reports, the Clarke Road Bridge EA was placed on the public record well before the publication date of this EIS, and the Kilally Basin EIS was well advanced (EEPAC received an update from the consultants last year). To ignore both the Clarke Road Bridge EA and the Kilally Basin EIS in the long term impacts section means the comments about long term direct impacts in this EIS understate impacts because impacts are cumulative and not isolated from one another. For example, the emergency overland flow from the SWM facility on this site is not shown in this EIS, even though it appears in the City lead EA for the SWM system.</p>	<p>The Environmental Impact Study (EIS) prepared by North-South Environmental as part of the Kilally South East Basin Municipal Class EA was not complete until September 2020. The AECOM Kilally Lands Plan of Subdivision Environmental Impact Study was completed in March 2020, therefore the information from the Kilally South East Basin (EIS) could not have been incorporated into our report. Notwithstanding this, we will incorporate information from the Kilally South East Basin (EIS) and the Clarke Rd Bridge EA into an updated EIS for the Kilally Lands Plan of Subdivision.</p>
<p>It is extremely unfortunate the Clarke Rd Bridge replacement and Kilally development projects aren't being considered jointly given that the SWM construction will precede the development. This piecemeal approach is undesirable at best, actively detrimental at worst. The City must consider the "big picture" in terms of these coincident development projects. There should be crosstalk between these projects to ensure the resulting development projects do not have unintended consequences.</p>	<p>See above</p>
EEPAC RECOMMENDATIONS	RESPONSE FROM AECOM
BUFFERS	
<p>EEPAC emphatically disagrees with Recommendation 2 (buffers) on page 45 and summarized on page 49.</p> <p>pg 49 "Recommendation 2 – the recommended buffer zones outlined above and delineated on Figure 8 should be implemented as protection measures and established as "no development" areas. Buffers may include multi-use trails."</p> <p>How are multi-use (i.e. paved) trails - that require tree removal (in a significant woodland no less) considered "no development"?</p> <p>The proposed buffer is insufficient given the sensitivity of the floodplain. Section 9.2.1 is the consultant's buffer justification however, EEPAC believes this is the first time it has seen this "backwards" rationale for a buffer:</p> <p>p. 45 - "The determination of buffer area dimensions is most dependent upon which activities will be permissible within the buffer. The nature of the development also affects how extensive the buffer zone should be, based on noise, dust, and lighting levels produced, and the degree of alteration of the existing habitat."</p> <p>There is no citation for this statement (We assume this is Castelle 1993 who is mentioned on page 44).</p>	<p>The buffer section of the EIS did not articulate the full extent of the buffers as shown on Figure 8. AECOM has reviewed the buffer section, clarified the recommended buffers and provided rationale for the buffer widths in the enclosed addendum.</p> <p>Note that the buffer width for the eastern property limits is 25m from rear lot-line to the woodland (this includes the 5m from the tree row); along the north eastern limits the buffer is 20m from the rear lot-line to the ESA boundary; and 20m along the north side. The buffers are predominately 20 m + from the proposed ESA boundary (only exception is a small stretch in the SE Subject Lands).</p>
<p>Given the high sensitivity of the Thames River Valley as shown in the EAs for the SWM works and for the Clarke Road Bridge replacement, EEPAC would have expected the consultant to indicate the width of the buffer was based on the habitat being protected rather than the nature of the development.</p> <p>In addition to site-specific biophysical factors (i.e., soils, slopes, local hydrology), Adamus (2007) asserts that buffer widths must be determined with consideration for:</p> <p>Adjacent land use activities; The amount and configuration of development in the adjacent lands and landscape; The structure and type of vegetation in the buffer; and The particular species the buffer is being designed to protect.</p>	<p>see above</p>

EEPAC RECOMMENDATIONS, CONTINUED	RESPONSE FROM AECOM
BUFFERS	
<p>Significant work has been done on buffers and was summarized by Beacon Environmental in 2012 in work done for the Credit Valley CA, where Adamus is cited. For example: Beacon Environmental on buffers (hyperlink to report)</p> <p>Page 48 of Beacon cites a study McWilliam et al. (2010), of over 180 areas adjacent to 40 different publicly owned forests in southern Ontario. These studies documented encroachments in 99% of areas within 20 m of the forest edge, with the most obvious and severe encroachments recorded within the first 10 m.</p> <p>Page 23 of Beacon also points out that "...studies underscore two important and related points for riparian systems: (1) that forest cover and land uses upstream tend to have a significant impact downstream, so that the benefits of buffers cannot simply be assessed on site-specific scale, and (2) depending on the upstream conditions, even substantial site-specific buffers may not be enough to compensate for broader, landscape-level habitat loss and degradation."</p> <p>Beacon summarized its recommendations in the following table [included in the original letter from EEPAC], which synthesized the work it reviewed and considered buffer widths as high, medium, and low risk of avoiding impacts on adjacent natural features. As indicated on the table, a 10-20 m buffer means a moderate degree of risk to the natural features. 10m is certainly on the low end of that range and 5 m is high risk.</p> <p>RECOMMENDATION 1: A 20 m buffer should be the minimum buffer from the ESA. Furthermore, if only a 10 m buffer is the final figure, any multi-use pathway should be outside the buffer and be in the setback not the buffer.</p>	see above
<p>EEPAC suggests that an even wider buffer is indirectly supported by the consultants on page 37 of the EIS when AECOM points out damage to the ESA is likely during construction.</p> <p>p. 37 "Damage to Adjacent Natural Features - roots may be damaged by machinery and soils may be compacted during grading and construction along the edge of the Kilally Forest, thereby affecting the health of edge plants. In order to address root damage, it will be necessary to prune roots of adjacent trees during grading and excavation. To avoid compaction of soils, root zones around trees within natural heritage features will need to be fenced. Most areas will be avoided by restricting construction to areas outside the features."</p>	see above
BUFFER ZONE PLANTINGS	
<p>p. 40 and section 9 discusses plantings of vegetation. Is it going to be required or not? Some places say will (section 9) and in others, 'should be considered'. P. 38 - creation of Ad-hoc Trails - An increase in human presence in natural features adjacent to residential development. Fencing, education, and dense buffer plantings should be considered during the final design stage to deter human intrusion into natural areas." It is not enough to say that people stay on paved trails. It also takes time for native vegetation to grow in and it is not any guarantee of compliance.</p>	Native plantings within the buffers will be a requirement for the development's Site Plan. Furthermore, fencing (without gates) along the rear lot-lines of the residential properties backing onto the ESA and its buffers will be required.
<p>Recommendation 4 on page 46 and Recommendation 10 on page 49 regarding buffer zone plantings are contradictory. Recommendation 10, planting for the multi-use pathway, ignores that multi use pathways are a min of 4 m wide along with a 1 m mowed strip on either side. Therefore there really is no 5 m buffer and the so-called 10 m buffer is in reality nothing of the sort.</p>	The EIS will be updated to address compensation measures. It is suggested that compensation plantings could be done within the ESA within exposed portions of the southwest slope, to improve slope stability in this area.
<p>Infill plantings in the ESA shown on Figure 8 on UTRCA lands is supported provided done in consultation with UTRCA's Forester. A donation from the proponent to the UTRCA to fund this work should be considered to maximize the amount of money towards plantings. (The after tax benefit of a donation might exceed a straight cash requirement)</p>	We have revised the areas for ESA infill plantings to an area along an exposed slope within the ESA community FOM4.
<p>Recommendation 6 includes an edge management plan. There is nothing in the report that states what such a plan is, who does it, when, and who approves it.</p> <p>RECOMMENDATION 2: An edge management plan must be prepared and approved by the City and the UTRCA as a specific condition in the development agreement.</p>	An Edge Management Plan can be part of implementation recommendations for detailed design.

SPECIES AT RISK	
RECOMMENDATION 3: – EEPAC supports page 37 which recommends consultation with MECP to address potential mitigation measures for American Chestnut and candidate SAR habitat within the Study Area for Chimney Swift, Northern Myotis, Little Brown Myotis and Tri-colored Bat, noting that a permit will be required for removal of barn swallow habitat.	Noted.
RECOMMENDATION 4: EEPAC adds that the UTRCA Forester as well as UTRCA biologist be consulted. The Forester is involved in a variety of tree preservation and tree banks in the Province.	Agreed.
Even though the provincial recovery strategy for American Chestnut (MNR 2012) recommends “that trees planted for horticulture, landscaping or research be exempt from the habitat regulation, EEPAC points out the Government’s response statement (2013) to the Recovery Strategy for American Chestnuts stated: Identify and assess planted populations of American Chestnut across Ontario to: • determine the genetic parentage (i.e., which one or more species of chestnut the tree is derived from) and geographical source of the trees, where possible; • act as potential sources of genetically-resistant trees for future restoration efforts and research purposes; and • reduce the risk of spreading blight from planted chestnut trees to naturally-occurring American Chestnuts.	The American Chestnut trees recorded were found on the property on the northside of Kilally Road and were confirmed to be planted by the property owner. A letter was sent to MNR Jan 2019 regarding these trees, however, no response was received. Any further actions with regards to these trees would be the responsibility of the private landowner.
RECOMMENDATION 5: Any change in land use must have a holding provision that requires a detailed environmental management plan that is produced in conjunction with the City plans for the SWM project which will proceed the development.	Noted.
LOSS OF BARN SWALLOW HABITAT	
It is specious to say that a loss of 20 barn swallow nests will result in no net loss because they will be replaced with kiosks. Given the lack of success of kiosks in the London area, it is not supported by the data to say no net impact. RECOMMENDATION 6: The NE patch of Study Area has meadow habitat and is further from Clarke Rd and the Veterans Memorial Parkway expansion. Consideration should be given to locating the nesting structure(s) there as it falls within the proposed 10 m buffer and includes suitable foraging habitat already.	Noted. We will review and consider the location of nesting structures in relation to foraging habitat.
RECOMMENDATION 7: Any structures must have capacity for a minimum of 20 nests. A greater number would be better to allow for growth of the colony if the structures prove successful.	Agreed.
EEPAC questions how will success of the structure be monitored? What steps will be taken to promote colonization of the artificial structures if the swallows don't move in on their own (playback of BASW calls etc. could be used in conjunction with monitoring to determine effectiveness of structures). Consideration should be given to reviewing the work of Cole noted in the following web site: https://www.coleengineering.ca/blog/2017/07/saving-ontarios-barn-swallow-population RECOMMENDATION 8: The monitoring plan include the monitoring of replacement barn swallow habitat and other compensatory mitigation be required if the replacement nesting habitat fails before the subdivision is assumed.	We will review the linked website. Monitoring of Barn Swallow structures will be added to the Environmental Monitoring Program/Plan. The plan will identify corrective measures for potential failures.
RECOMMENDATION 9: The subdivision, perhaps in the park, contain educational signage / plaques to discuss SAR including the purpose of the barn swallow structures. This seems an excellent opportunity for educating the community living so near the CA and can instill a sense of community pride in the swallows and their habitat.	We agree. We will recommend installation of signage for the barn swallow structures to both decrease disturbance and provide education.
REDUCING HUMAN INTRUSION INTO THE ESA	
The EIS points out on p. 34 Compacted Soils – “A small well used trail is located at the northern edge of the Subject Lands. The trail surface is compacted soil which creates a small void in vegetation and also contributes to the potential for human intrusion into the natural areas further compacting soil within them.” RECOMMENDATION 10: A condition of the development agreement require the proponent to scarify this trail so that it is visually eliminated to reduce the likelihood of encroachment.	We will consider including recommendations to rehabilitate the areas where the existing foot trail has resulted in compacted soils.

REDUCING HUMAN INTRUSION INTO THE ESA, CONTINUED	
<p>The EIS further notes on page 38 that an increase in human presence in natural features adjacent to residential development. Fencing, education, and dense buffer plantings should be considered during the final design stage.</p> <p>What is “education”? Simply handing people information is not education. Constant reminders in the form of permanent signage would likely be more effective. Signage should explain the significance of the river valley in this location, why it should be protected (left alone). Regular mailings about the ESA including the City’s Living with Natural Areas should be provided to residents.</p>	Agreed. We will revise this section of the EIS to be specific and include signage.
<p>EEPAC notes that Figure 7 shows lots within Regulation limits. Can Section 28 approval require signage?</p>	Section 28 approval is the jurisdiction of the Upper Thames River Conservation Authority (UTRCA).
<p>EEPAC also notes another reason for signage and significantly more buffering is the presence in the river valley of endangered species.</p>	Noted
<p>RECOMMENDATION 11: All properties adjacent to the buffer and setback be required to be fenced with no gates.</p>	Fencing without gates will be a condition of the Site Plan Approval for the development.
<p>RECOMMENDATION 12: Once 70% of the units are constructed, each unit must receive a copy of the City’s Living with Natural Areas brochure. This should be a condition of the development agreement or the City’s responsibility</p>	Agreed. Homeowner’s packages should include a copy of the City of London’s “Living with Natural Areas” brochure.
<p>EEPAC agrees with the installation of protective fencing during construction as per recommendation 3 of the EIS. However, this is a standard condition.</p>	Noted
<p>Recommendation 5 of the EIS is standard and supported.</p>	Noted
<p>EEPAC agrees with Recommendation 1 on p. 44 of the EIS that the delineation of the Kilally Forest Environmentally Significant Area be amended on Schedule B-1 of the City of London’s Official Plan and Map 5 of the London Plan to reflect the boundaries shown on Figure 5 of this report. EEPAC believes this recommendation is already in progress as a result of Council’s actions related to the Kilally Basin SWM EA.</p> <p>RECOMMENDATION 13: If the City has not amended the delineation of the Kilally Forest ESA, it should be part of the change in land use and zoning related to this application.</p>	Noted
<p>Recommendation 11 of the EIS proposes that a detailed Environmental Monitoring Program should be prepared prior to the initiation of construction. The questions are: at what point in the process does this occur, who reviews and approves it and what are warranty periods? Further, if encroachment is noted, the program must have some recommendations for how to pay for fixes. Monitoring should be done in conjunction with the City which is building the storm facility. Ideally, such monitoring could be funded from DCs as well as by the proponent.</p> <p>However, Beacon p. 3 noted that monitoring:</p> <p>While monitoring can readily document what is happening within the buffer (e.g., increases in wildlife use or vegetation development for example), and within the core natural area (e.g., shifts in bird species abundance and diversity), only a very carefully designed and well-replicated study with controls may be able to detect if any changes (or lack thereof) in the core habitat are related to the presence (or absence) of a buffer. Often, in real world situations, there are not opportunities to create adequate replicates, or set aside control sites. In addition, monitoring (particularly long-term monitoring) requires both a financial and resource commitment that is beyond the means of most jurisdictions. It also requires individuals who understand the importance of good study design, and are able to make sense of intensive and temporally extensive data, something that is seldom, if ever, undertaken in Ontario for projects under the Planning Act</p>	To be addressed by the City of London.
<p>RECOMMENDATION 14: EEPAC be circulated on the proposed environmental management plan for comment prior to its acceptance by the City.</p>	Noted. This is at the discretion of the City of London.
<p>RECOMMENDATION 15: The study design for monitoring be reviewed by the City and UTRCA as a condition of the development agreement.</p>	Agreed.

INDIRECT IMPACTS	
<p><i>“Lighting and Noise Impacts – The proposed development will result in an increase in lighting and noise within the Study Area. The introduction of lighting can influence wildlife in natural areas, particularly nocturnal species. The effects of lighting on natural areas may cause certain species of wildlife to move away from the natural areas within the subject lands. In order to limit the potential impacts of light on the adjacent natural heritage features, recommendations will be made to limit or relocate lighting in areas adjacent to natural heritage features and to select lighting standards that minimize diffuse light. Light standards and fixtures can also be shielded to reduce the direct light exposure to natural areas. Dense planting in buffer areas may be considered for noise reduction in select areas. “</i></p> <p><i>EEPAC is unclear when “recommendations will be made to limit or relocate lighting in areas adjacent to natural heritage features...”. It is also unclear what these recommendations will be based on.</i></p> <p>RECOMMENDATION 16: A condition of the development agreement include shielded light standards and fixtures to reduce direct light exposure by requiring the new City of London Bird Friendly Skies lighting design criteria are followed http://www.london.ca/business/Planning-Development/Pages/Bird-Friendly-Skies.aspx</p>	<p>We will review the recommendation and clarify.</p>
<p><i>Glass windows placed near an ESA are going to be especially prone to bird collisions. Therefore, EEPAC recommends:</i></p> <p>RECOMMENDATION 17: Bird-friendly glass materials be used for homes in the development especially those along the outer border facing the ESA. EEPAC or The Advanced Facility for Avian Research at Western University would be pleased to provide detailed information on suitable materials and their application/installation.</p>	<p>Agreed that the requirement for bird friendly glass material be used for homes along the ESA side of the development.</p>
SUBDIVISION DESIGN	
<p><i>Is the entrance off Kilally Road necessary? It seems to require eliminating environmentally significant land and will increase traffic on Kilally along the natural heritage leading to increased noise, pollution, runoff, roadkill, and other negative impacts.</i></p> <p>RECOMMENDATION 18: Have an entrance from Clarke Rd directly on the west side, and leave the north side closed to road traffic from Kilally.</p>	<p>A direct entrance to the proposed subdivision from Clarke Road is not possible for several reasons: the property does not have frontage on Clarke Road, a Hydro Transmission line runs along Clarke Road, and a direct entrance from Veteran's Memorial Parkway would not be possible.</p>
<p><i>EEPAC notes that missing from the EIS is any discussion or mention of the temporary sewage pumping station to be located at the northwest corner of the site. The Sanitary Servicing Report for the site found on the City web site is silent on where any overflows from the pumping station will go. EEPAC assumes it would be to the Thames which would result in negative impacts at the point of discharge and downstream. This missing element from the EIS leaves EEPAC to recommend the following.</i></p> <p>RECOMMENDATION 19: The application not be accepted as complete until the EIS is modified to deal with the impacts of having a sewage pumping station adjacent to a sensitive habitat.</p>	<p>We will add text to address any potential impacts from the temporary pumping station.</p>
CRITIQUE OF EIS FINDINGS	RESPONSE FROM AECOM
<p><i>This document contains vital but missing information that reinforces many of the gaps we considered as part of the EMG review. There are recommendations for pre-construction plans that have not materialized yet. EEPAC would appreciate the opportunity to review these plans.</i></p>	
<p><i>1.1 pg 1 – It is unclear where property access was available and how much of the Study Area and Subject Lands it covered. Did access permit adequate assessment of Study Area? How was this evaluated & assessed?</i></p>	<p>We will revise figures and text to show where property access was granted and where we assessed.</p>

CRITIQUE OF EIS FINDINGS, CONTINUED	RESPONSE FROM AECOM
<p><i>Figure 3 pg 11 – How were wildlife monitoring locations determined and deemed sufficient to capture wildlife within the Study Area sufficiently?</i></p>	<p>Breeding bird point counts were established at three locations (at least 200 m apart to reduce double counting) near the edge of the Subject Lands each adjacent to a different vegetation community to capture the diversity of birds in the Study Area.</p> <p>The amphibian station was established on Kilally Rd adjacent to and within range of the OAO communities, where it was safe for staff to conduct night surveys. No other suitable amphibian breeding sites were identified.</p> <p>Snake cover-boards were placed among tall grasses and forbs in locations with open canopy that would receive significant sunlight throughout the day spaced out along the edges of the Subject Lands.</p>
<p><i>3.2.3.2 Results pg 20 – It is unfortunate that there were no survey dates in mid-May. July 11 is late for a breeding bird survey as many early breeding species would be finished breeding at this time and may have started to move more widely than during peak breeding activities (mid- May to late June).</i></p>	<p>This survey, occurring only one day outside of the breeding bird season, did not seem to influence the results. The survey on July 11, 2017 resulted in a large diversity and density of bird species.</p>
<p><i>3.2.4.2 Results pg 21 – How confident are the surveyors in their survey results given road noise obscured their ability to hear calls? This would appear to be contrary to the accepted protocols for amphibian surveys and calls into question the reliability of the results.</i></p>	<p>Survey staff were able to hear amphibian species outside of the 100m survey area during a high background noise evening. This shows that if amphibians were present and calling within the 100m survey area, they would have been heard and recorded.</p>
<p><i>4.2 Provincially Recognized Features and Species There are recognized bird species observed at Fanshawe CA that are not represented here. Full list on eBird: https://ebird.org/hotspot/L459666</i></p>	<p>We did not use eBird in our background analysis. We will review and revise the EIS to include any relevant information.</p>

March 17, 2021

Phil Masschelein
Sifton Properties Limited
1295 Riverbend Road, Suite 300
London, Ontario
N6K 0G2

Project No. 60557861

VIA EMAIL

Dear Mr. Masschelein:

**Subject: Kilally Lands – Environmental Impact Study Addendum
Caverhill Plan of Subdivision File #TS2017-004**

Further to comments received from the City of London, the Upper Thames River Conservation Authority (UTRCA) and the Ecological and Environmental Planning Advisory Committee (EEPAC), we are providing this Environmental Impact Study (EIS) addendum to address ecological buffers, buffer treatments and other environmental management recommendations. Specific comments received are addressed in a comment response table provided under separate cover.

We have revised our Environmental Management Plan **Figure 8** (attached) with the most recent Plan of Subdivision, showing the ecological buffers, park blocks, stormwater management block and revised trail alignment. Relevant updates to the Plan of Subdivision include:

- Relocation of the street entrance from Kilally Road to the west,
- Relocation of the stormwater management facility (Block 25) to the northwest corner of the site,
- Increase in the size of Open Space Parkland Block 22 (0.47 ha),
- Realignment of the multi-use trail to avoid the Environmentally Significant Area (ESA) and its buffer.

1.0 Ecological Buffers

The requirements for ecological buffers for the Kilally Lands (Caverhill Plan of Subdivision) are based on the protection of the Kilally Environmentally Significant Area (ESA) along the eastern, northeastern and northern limits of the Plan of Subdivision. The requirements for buffer widths and treatments with rationale are as follows:

Eastern Buffer, 25 m: Along the eastern limits the lands adjacent to the Plan of Subdivision are primarily a cultural Deciduous Plantation (CUP1) and a cultural White Spruce – European Larch Coniferous Plantation (CUP3-8), separated by a maintained gas pipeline easement.

Although these communities originated as plantations, they are succeeding into more naturalized woodlands. Within the 25 m buffer is an existing tree-line that is to be preserved and enhanced with tree and shrub plantings. This buffer is intended to provide edge and rooting zone protection for adjacent trees and separation of the vegetation communities from the development sufficient to protect the integrity of the woodlands and habitat within this part of the ESA. At the southeast corner, the recommended buffer is 10m from the adjacent Cultural Woodland (CUW1) as this community is sparsely tree and isolated from the adjacent wooded areas of

the ESA. Given that the adjacent communities have a low sensitivity, based on a low Floristic Quality Index (>50% of species with a low sensitivity ranking), the 25m and 10m buffer are considered to be adequate for the protection of the adjacent communities.

As noted, the eastern buffer should be enhanced with native tree and shrub plantings to increase the density of vegetated cover between the residential development and the ESA. This development-buffer limit should be fenced without gates to prevent landowner encroachment into the buffer and ESA.

Northeastern Buffer, 20 m: Along the northeastern limits the lands adjacent to the Plan of Subdivision (Low Density Residential Block 2) include a Dry-Moist Oldfield Meadow (CUM1-1), with a Dry-fresh White Cedar Mixed Forest (FOM4) between the meadow and the Thames River, and a Moist Sugar Maple Deciduous Forest (FOD6) more to the north. Considerations for buffering include the protection of these communities, but also the protection of the Thames River corridor and habitat for Species at Risk potentially occurring within this reach of the Thames River.

The majority of the development-buffer interface along this part of the Plan of Subdivision is along the meadow community (CUM1-1) for which the 20 m buffer will be more than sufficient to protect rooting zones and the integrity of the community, plus separation from the low density residential lots. As with other boundaries to the ESA and its buffer, this limit should be fenced, without gates.

It should be noted that a conservative approach was taken to the delineation of the ESA boundary with the application of Guideline 7a where old-field meadow (CUM1-1) was included to minimize edge effects. This application inherently includes buffer capacity within the ESA boundary. Alternatively, the application of Guideline 7e could justifiably been applied to include only the meadow inclusion in FOM4 bringing the ESA boundary to the top-of-slope. It could then be argued that there is a 30 m buffer between the development and the ESA.

With respect to separation between the development and the Dry-fresh White Cedar Mixed Forest (FOM4) there is **30-40 m** when considering the meadow inclusion along the southern limits of the community. This meadow was included in the community as it was situated below the top-of-slope. This inclusion is recommended for tree and shrub planting to increase the area of the forest community and to stabilize the slope. The separation of this forest from the development and with the planting of the exposed slope will ensure protection of the community and a net gain in habitat.

With respect to the Thames River, within this part of the Plan of Subdivision the distance between the development limits and the Thames River is a minimum of **80 m**. Areas to the east and west of this section are great than 100m.

Two SAR snake species have been recorded for the area including the study area for the Kilally Lands; these species are the queen snake (*Regina septemvittata*) and the eastern hog-nosed snake (*Heterodon platirhinos*). The queen snake's habitat is typically river/stream shorelines and the forest habitat adjacent to rivers/streams. The Ministry of Natural Resources and Forestry's (MNRF) Habitat Protection Summary for Queensnake identifies the queen snake's Regulated Habitat to be **30 m** from its riverine habitat inland. Based on this regulated area distance, the queen snake's habitat should be more than adequately protected by the 80 m from the river to the development. The eastern hog-nosed snake is more of a generalist and, therefore, uses a range of habitat types including open vegetation (open forests and shrubland) in proximity to water, including wetlands. While the critical habitat of the eastern hog-nosed snake has yet to be defined, some of the species' preferred habitat does occur within the ESA lands. Given this, we are of the opinion that the protection of the riverine

habitat along the Thames River and the adjacent forests, with wetland/pond pockets (Open Aquatic Ecosites, OAO) northwest of the Plan of Subdivision limits, will afford sufficient protection for the eastern hog-nosed snake.

Based on the potential for the presence of eastern hog-nosed snake and the limited meadow habitat within the area, we recommend that the buffer along the northeastern limits of the Plan of Subdivision be restored with native meadow plantings including a meadow seed mix and shrubs.

It should be noted that with the above recommended buffer that the Candidate Significant Wildlife Habitat (SWH) within the ESA will be protected. These Candidate SWH include bat maternity colonies, eagle and osprey nesting, foraging and perching habitat, and special concern/rare wildlife habitat for the eastern wood-peewee.

Northern Buffer, 20 m: Along the northern limits the lands adjacent to the Plan of Subdivision include a Moist Sugar Maple Deciduous Forest (FOD6) with two pond/wetland pockets (Open Aquatic Ecosites, OAO). The proposed development within this part of the Plan of Subdivision is the stormwater management facility (Block 25, Open Space SWM Pond). The development, design and approvals for the stormwater management facility is the subject of the City of London's Kilally South, East Basin Municipal Class EA. Any further buffer considerations should be part of the site-specific considerations for the approvals of that facility. Notwithstanding this, we are of the opinion that the 20 m buffer in this area is sufficient to protect the ESA and its features and functions.

We note that the above recommended buffers are consistent with and exceed the minimum buffer widths recommended in the City of London's Environmental Management Guidelines (2007).

2.0 Park Blocks – Management

Parkland Block 22 is situated on lands immediately adjacent to the Kilally ESA presenting an opportunity for additional buffer capacity. Parkland Block 22 overlaps with a well treed residential property. The Detailed Design for the Plan of Subdivision should include the preservation and protection of as many mature trees as possible within this block. Additional tree planting should also be considered for areas along the northern perimeter of the block.

3.0 Multi-use Trail Alignment

With the realignment of the multi-use trail to areas outside of the ecological buffers for the Plan of Subdivision, no additional buffer width should be required to provide protection of the Kilally Lands – Caverhill Plan of Subdivision.

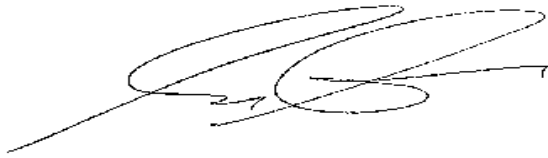
4.0 Infill Planting

We have removed the infill planting areas shown within UTRCA lands and have included an area inside of the proponent owned lands (shown on Figure 8). The area proposed for infill planting is the area of exposed slope within the delineated Dry-fresh White Cedar Mixed Forest (FOM4) community, but outside of the forest dripline. As noted above, this inclusion is recommended for tree and shrub planting to increase the area of the forest community and to stabilize the slope.

While within the ecological buffer, the existing Kilally Road north of Block 22 represents an opportunity for restoration. A portion of this area is situated within the Plan of Subdivision lands and the remaining is City of London roadway. The extend of restoration would be limited to the area east of the residential property on the north side such as to allow access to the property. The restoration area would require removal of the paved surface of the road, base material, replacement of fill and topsoil, then seeding and planting.

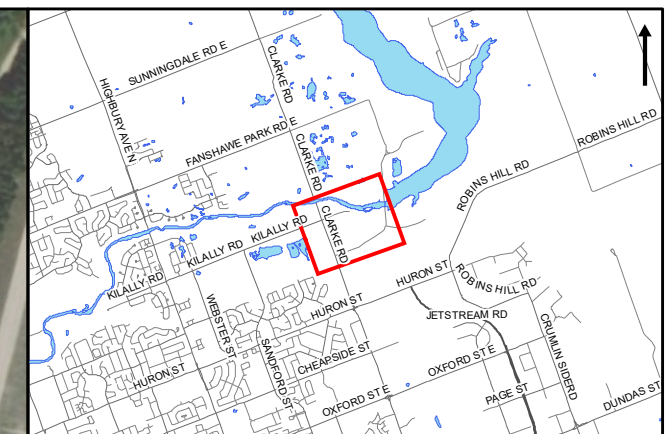
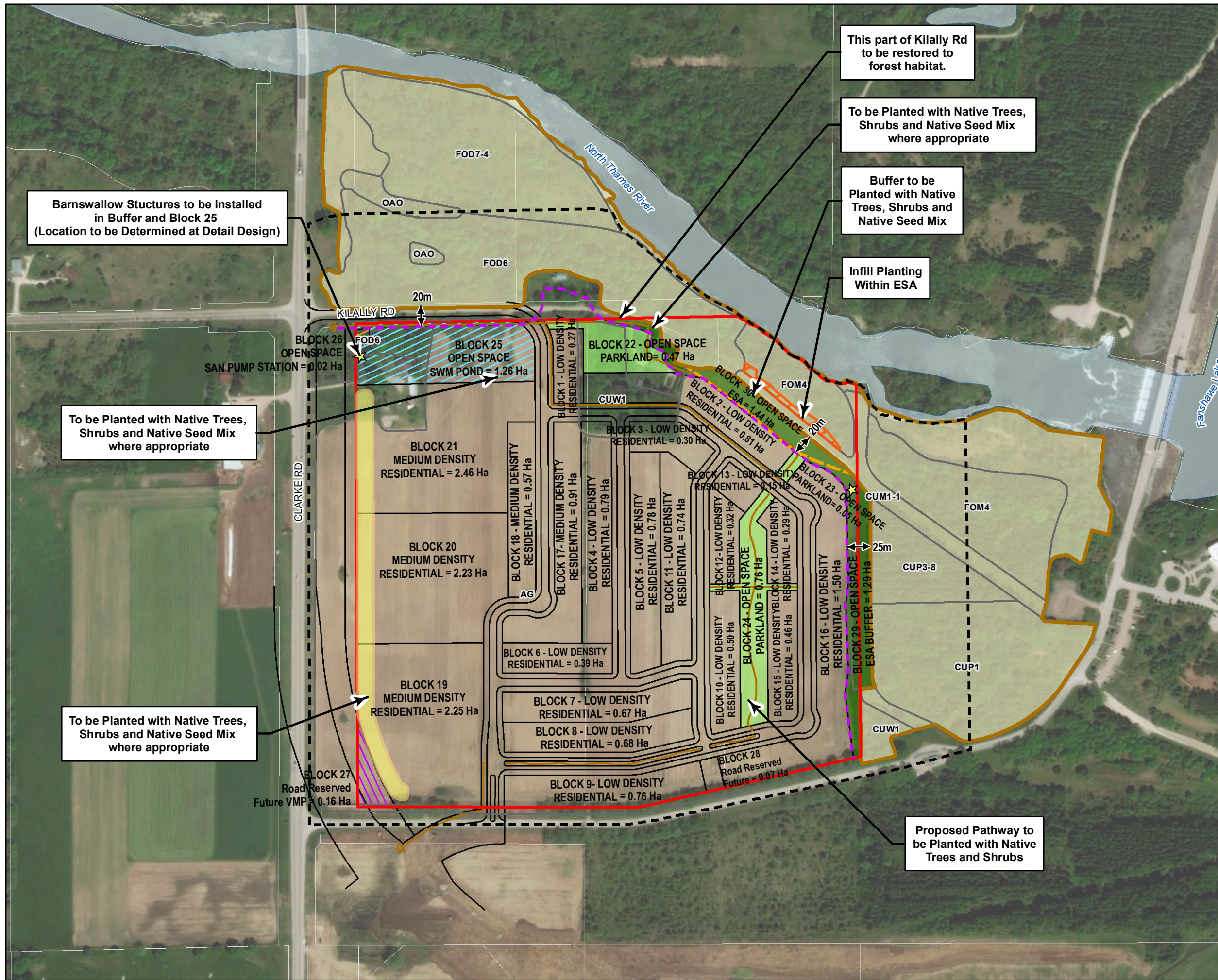
Should you have any questions or concerns, please do not hesitate to contact me at 343-543-9463.

Sincerely,
AECOM Canada Ltd.

A handwritten signature in black ink, appearing to be 'G. A. Epp', written in a cursive style.

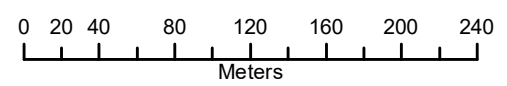
Gary A. Epp, M.Sc., Ph.D.
Practice Lead, Ecology & Senior Ecologist
Impact Assessment & Permitting, Environment

GE:ge
Attach.



Legend

- Subject Lands
 - Study Area
 - ★ Proposed Barn Swallow Habitat
 - Waterbody
 - ELC
 - Property Parcel
 - Proposed ESA Boundary
 - Infill Planting (0.09ha)
- Proposed Layout**
- Proposed Design
 - Erosion Hazard limit (Geotech, Peto, MacCallum, Jan 2018)
 - Potential Pathway
 - Natural Heritage Buffer
 - Open Space (SWM Pond)
 - Open Space (Sanitary Pumping Station)
 - Road Dedication
 - Proposed Noise Berm (0.77ha)
 - Open Space (ESA Buffer)
 - Open Space (Parkland)
 - Open Space (ESA)
- ↔ ##m Width of Buffer



Kilally Lands Environmental Impact Study

Environmental Management Plan

March 2021	1:4,000	Datum: NAD 83, Zone 17 Source: City of London, LIO Base Map: ESRI, Others
P#: 60557861	V#:	

Figure 8

This drawing has been prepared for the use of AECOM's client and may not be used, reproduced or relied upon by third parties, except as agreed by AECOM and its client, as required by law or for use by governmental reviewing agencies. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that modifies this drawing without AECOM's express written consent.



London
CANADA

The City of London
Western Road and Sarnia Road/Philip Aziz Avenue Improvements
Municipal Class Environmental Assessment

NOTICE OF STUDY RESTART

August 16, 2021

PUBLIC NOTICE

Project Restart

In January 2015, the City of London, through its consultant AECOM, initiated the Western Road and Sarnia Road/Philip Aziz Avenue Improvements Municipal Class Environmental Assessment (MCEA) for improvements to Western Road from Platts Lane to Huron University College and Sarnia Road/Philip Aziz Avenue from Coombs Avenue east to the Thames River (See Map). An initial Public Information Centre (PIC) was held in June 2015.

In 2016, the project was put on hold when alternatives for transit routes through the study area were being considered as they related to Rapid Transit (RT). As it is related to this project, the northern routes for RT have been deferred and the City has decided to restart this project.

Background

Western Road between Huron College and Platts Lane is part of a primary transportation corridor that services Western University and other local institutions in addition to some residential and commercial uses. Within this corridor, the Western Road and Sarnia Road/Philip Aziz Avenue intersection supports a large volume of vehicle traffic making turning movements, high pedestrian/cycling traffic and frequent transit services. This type of traffic is expected to increase in the future.

The City of London Transportation Master Plan suggests the Western Road and Sarnia Road/Philip Aziz Avenue intersection be improved to accommodate increased traffic, address safety, and improve road width constraints along Philip Aziz Avenue.

Planning for the Future

This study will be completed in accordance with the Ontario Environmental Assessment Act and will follow the MCEA (Schedule C) process. The project team will examine a full range of alternatives and improvements. Future university expansion plans, recent and or planned municipal infrastructure (e.g. watermains and stormwater management), walking and cycling features, effective movement of traffic and environmental impacts will be considered.

Your Involvement is Important

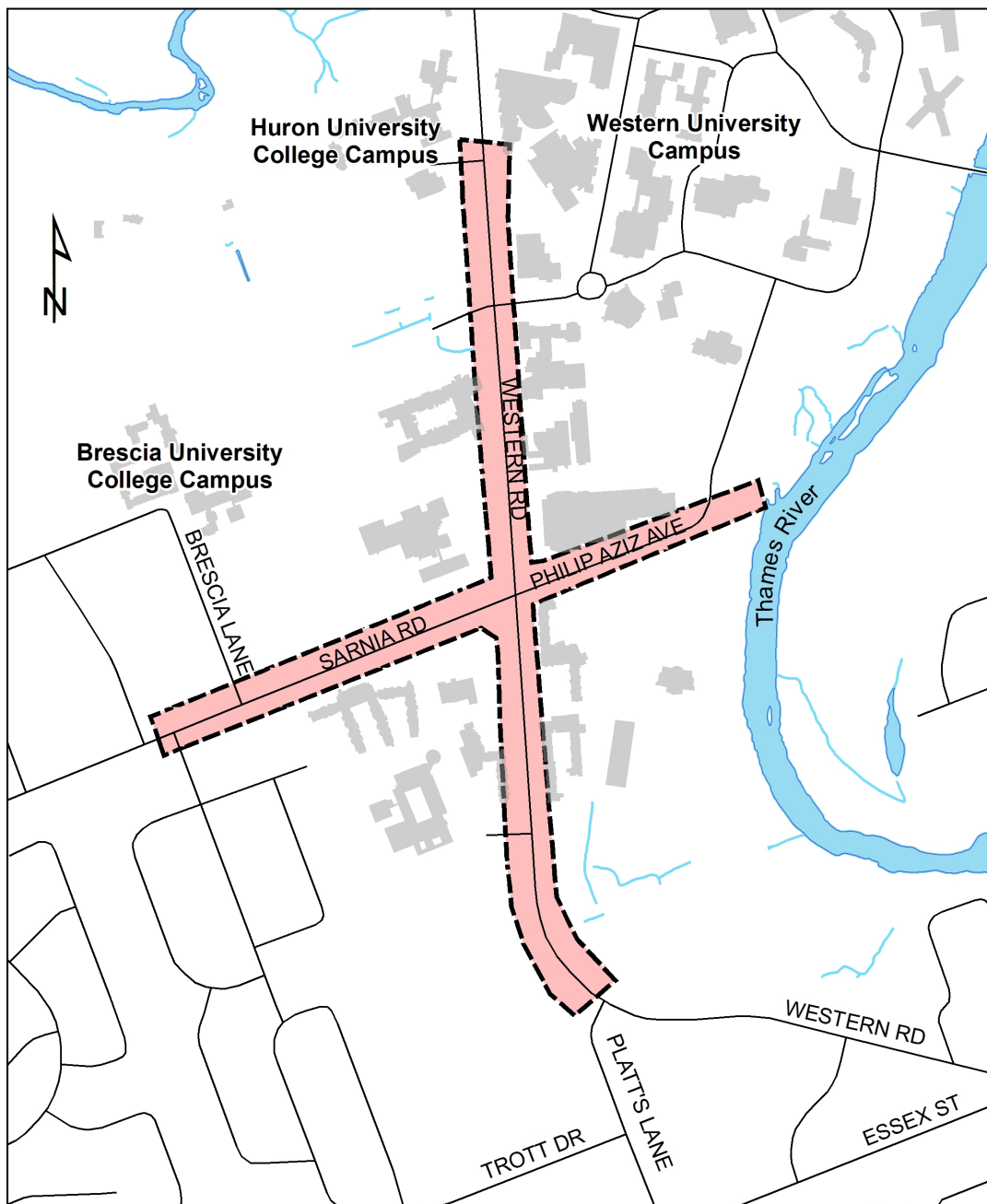
You will be consulted throughout this study and asked to help shape the future of the community. A PIC will be held in the fall of 2021 to present the updated problem/opportunity statement, a review of the study progress, the evaluation of the alternative solutions and project timeline. Another PIC will be held in the spring of 2022 to present the evaluation of alternative design concepts for the preferred solution, in addition to proposed mitigation measures and next steps. Advanced notification of the PICs will be advertised on the City of London website and in the Londoner newspaper, in addition to regular mail. Comments from review agencies and members of the public are encouraged now and throughout the study. To learn more, visit the project website:

<https://london.ca/projects/western-road-sarnia-road-philip-aziz-avenue-environmental-assessment>.

To provide comments, receive additional information or be added to the study mailing list, contact either of the following team members below:

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With the exception of personal information, all comments will become part of the public record of the study. The study is being conducted according to the requirements of the Municipal Class Environmental Assessment, which is a planning process approved under Ontario's Environmental Assessment Act.