

Subject Lands Status Report – Springbank Drive

dated March 21, 2013

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Theme #1: Inadequate and inappropriate data for completion of SLSR

The objective of a Subject Lands Status Report (SLSR) is “to inventory, evaluate, assess significance of features and functions, delineate boundaries and make recommendations for designation” (p. 5 EM Guidelines). Further, “a SLSR must give special consideration to the identification of environmental management requirements and ensure that key resources are adequately studied and protected through connectivity, buffers and monitoring (p. 5 EM Guidelines).”

EEPAC is of the opinion that this SLSR is lacking in many of the proper input data to make appropriate conclusions about subject lands. This is highlighted by the consultants themselves who point out (page 7) that vegetation surveys are not ideal to be carried out in the middle of the winter. SLSRs cannot leave most of the work for the EIS, as is done in this report (page 16 – Terms of Reference). One would think that the EIS will soon follow but this is not given (personal communication with Mike Davis on January 15, 2014). Developers might change their minds but the SLSR is on record to say certain things that were not fully assessed. In EEPAC’s opinion an SLSR has to stand alone and cannot look ahead to the EIS for performing the work it was set out to do.

Recommendation 1: As per Environmental Management Guideline of the City of London, life science inventories must be conducted in season and over multiple seasons (either 3 or 5 season inventories as appropriate for the particular class of flora and fauna). There is ample evidence from the adjacent ESA that subject lands are most likely used by vulnerable, threatened and endangered species. (It is unclear whether Coves ESA studies conducted in 2011 evaluated subject lands).

Recommendation 2: Groundwater well hydrological results must be shown in an appendix with location of well and proper cross-section.

Recommendation 3: The ESA boundary must be identified within the context of this SLSR. Just based on a simple desk-top analysis the drip-line of trees certainly extends beyond the ESA boundary shown in the SLSR (which was taken from another study)(Figure 1).



Figure 1: Subject lands viewed from above during the summer (Source Google).

THEME #2: Potential brownfield site

Given its former use as an auto-dealership and auto/bus service site, there is ample concern to carry out soil testing for contaminants. A brownfield assessment is necessary which may also determine if brownfield pollution is affecting the ESA currently. (The SLSR calls for soils testing during the EIS, however, it should be the job of this SLSR to undertake that study.)

Recommendation 4: Appropriate soil testing is necessary to determine the level of soil contamination. Soils may be compacted now, but during excavation contaminants may be disturbed and may be washed into the West Pond of the Coves.

THEME #3: Management recommendations

Much more is needed on management recommendations. While ESA and geotechnical boundaries have been offered, there is no comprehensive assessment of buffer required to protect the significant features and hazards.

Recommendation 5: Appropriate buffers need to be shown for the ESA, including consideration for geotechnical, as well as riparian forest protection. (15 – 30m + 4m) (Figure 2).

Recommendation 6: Soil remediation plans (including monitoring) need to be presented with consideration of potential location of oil/grit separator location(s).

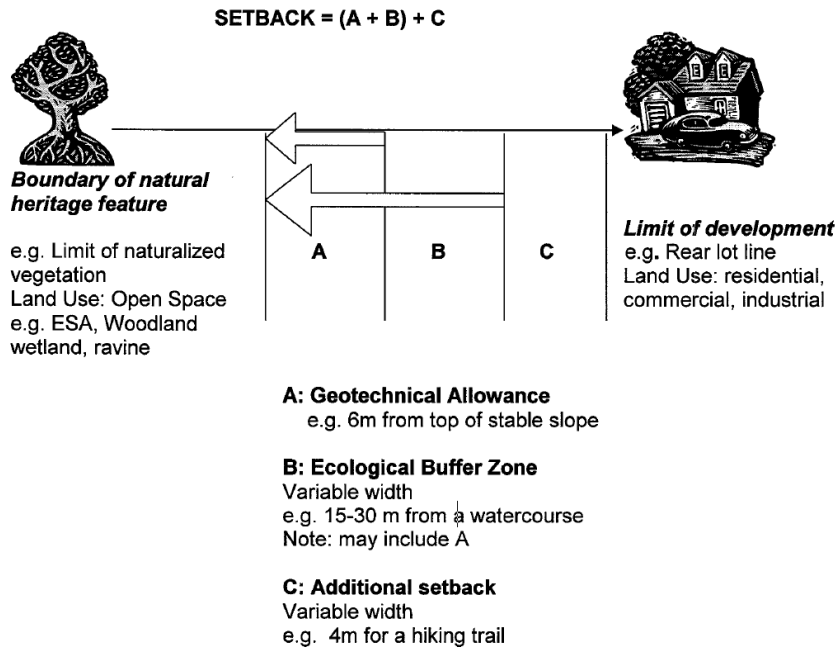


Figure 2: Schematic representation of buffers and setbacks (p.119 EM Guidelines).

Field notes by EEPAC:

- ELC areas 1 & 3 have small hackberry, some young poplar, manitoba maples, and a large walnut
- This ESA has and still is a main gathering area for migrating shorebirds, ducks, herons, egrets as well as land birds. It is also an important inner-city area for breeding birds in our part of Ontario. Some of the shoreline vegetation on the site of the slope frequently has herons roosting throughout the year.
- There was a large bus barn 50 years ago on this site (Figure 3). It was used to service buses.



Figure 3: Footprint of former bus repair building (Source Google).