



AECOM
50 Sportsworld Crossing Road, Suite 290 519.650.5313 tel
Kitchener, ON, Canada N2P 0A4 519.650.3424 fax
www.aecom.com

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CITY OF LONDON
DEVELOPMENT SERVICES

February 9, 2015

VIA EMAIL

Maureen Zunti
Sifton Properties Limited
195 Dufferin Avenue, Suite 410
London, Ontario
N6A 4M8

Dear Ms. Zunti:

Project No: 60120375

**Regarding: Riverbend South Secondary Plan & Phase 1 Plan of Subdivision
Environmental Impact Study**

The following provides a response to comments received from the City of London's Environment and Parks Planning Department, dated December 8th 2014, regarding the Riverbend South Secondary Plan Environmental Impact Study (July 25, 2014).

Comment 1. *While the EIS did speak to this woodland being preserved as part of a tree preservation area in the recommended plan (as a Park Block), buffers were not discussed or applied to this feature. Without sufficient buffers, this feature is likely to decline further as a result of changing land uses on all sides. While we can accept that in its current state this woodland would lean towards not being considered significant, the historical context around this remnant woodland should be considered. Further discussion on the protection and enhancement of this feature should be identified and carried forward.*

The isolated woodland is referred to in the EIS as a "treed patch" or "wooded patch"; according to the Natural Heritage Study produced by AECOM, ELC methodologies identified this woodland as a FOD5-1 Dry-Fresh Sugar Maple Deciduous Forest Type. When discussing this feature, refer to it as a woodland and/or forest as identified. The language used in the EIS when referring to this feature appears to be reducing its significance or status as a remnant woodland on the site.

Response 1. In December 2014, the dripline of the isolated woodland patch was surveyed. This surveyed dripline as well as recommended buffer setbacks have been included within Figures 2 through 5 within the updated EIS report. Also, the language within the updated EIS document has been changed to refer to the remnant woodland as "isolated woodland" or just "woodland." As well, the buffer section has been updated to include setback recommendations for the isolated woodland.

Comment 2. *Figure 4 & Figure 5 – The identified ESA limit in the southeast corner has only been provided a 2 meter setback with restoration taking place within the ESA feature. While this is a huge improvement and the ESA edge is moved to include this bay, sufficient buffer to this restoration area*

is required in order to protect the new edge of the ESA feature. Please clarify why this area is not being provided the recommended buffer to the ESA in this location. Apply the recommended buffer in this location based on the identified criteria in the EIS. In addition, the buffer adjacent to the ESA in the south most section of the Study Area is shown as 18 m, however the woodland in the ESA behind the buffer appears to be FOD2-4 and FOD4-2, which would require between a 25 m – 28 m buffer according to the Buffer rational identified in Section 5.2.2 and Table 5-1.

Response 2. A 2 meter buffer was recommended within this area because a large portion of this area is currently not part of the formal ESA. Instead, it is primarily a meadow that will be enhanced with native tree and shrub plantings. 2 meters is considered sufficient to protect the rooting zone of grasses and small shrubs in the area. The revised ESA edge incorporates the buffers required for the ESA and area to fill in the embayment area of the ESA at this location. From the current ESA edge, there is an approximate 45 metre setback that is recommended to be restored with native tree and shrub plantings.

With respect to the buffer associated with the FOD2-4 and FOD4-2. These areas have a recommended buffer of 18m considering that the edge of these communities is dominated by buckthorn, hawthorn and immature ash species.

Comment 3. *Figure 5 – Identify potential hedgerows to be protected and/or incorporated into future site specific plans. There is opportunity to retain these features and this should be noted in the text and on Figure 5.*

Response 3. Most of the hedgerows have been removed for agricultural cropping in recent years, save for a portion of one within the most southerly portion of the site. This area has been recommended for preservation and is shown on Figures 2 through 5 of the updated EIS.

Comment 4. *Section 4.4.2 Mitigation Impacts – In this section including Table 4-1 identify that fencing to be installed along the rear lot lines of all homes adjacent to natural features are to be gateless and of sufficient height to prevent dumping of yard waste behind the property. This item should also be specified in the net effects tables.*

Response 4. The text in Section 4.4.2 and the Net Effects Table has been revised to read "Installation of fencing along rear lot-lines of all homes adjacent to natural features. Fencing is to be gateless and of sufficient height to prevent dumping of yard waste behind the property."

Comment 5. *Section 5.2.3.1 Buffer Management Zone 1: Wetland Creation – Indicate the proposed timing for the enhancement of this feature in relation to phasing and construction. What would be a reasonable outcome/ goal of this enhancement and what specific monitoring would be needed? In addition, show a conceptual trail route.*

Response 5. Section 5.2.3.1 has been revised to include the following, "Timing of the wetland creation should be coincident with nearby grading activities in the development area, a time when construction equipment will be in the area already. The overall goal for this area is to provide additional amphibian habitat. For monitoring purposes, additional amphibian surveys within this area

are recommended to document the success of this enhancement." A trail is not recommended for this specific area.

Comment 6. *Section 5.2.3.3 Buffer Management Zone 3: Meadow Enhancement for Butterfly Habitat – These zones should also be added to the buffer area surrounding Hickory Woods, the remnant FOD5-1 Forest and along the pathway system. Areas that are currently active agriculture that will become buffers are prime locations to establish this habitat type of pollinator friendly habitat, which should be encouraged throughout the study area and not just along one small section of buffer.*

Response 6. Figure 5 has been revised to incorporate Meadow Enhancement for Butterfly within all buffer areas, including the Significant Hickory Woodland and Isolated Woodland, as well as the green space corridor link.

Comment 7. *5.2.3.4 Tree Retention– While some trees have been identified to be retained, more detail is required that identifies how these trees will be retained especially as it relates to potential grading changes in these areas and that in order to protect these individual trees, additional trees may also be protected at the same time. For example, will tree protection fencing be established at the dripline of these individual trees to be preserved to ensure grading does not occur within the dripline?*

Response 7. Section 5.2.3.4 has been revised to include, "During construction, in order to protect these trees from construction equipment, protective fencing is recommended to be installed at the dripline of each specimen tree."

Comment 8. *5.2.3.5 Steps in Edge Management Plan – This section should also clearly indicate that the tree protection fencing be inspected prior to gaining clearance for removing approved vegetation. The edge of the ESA and the buffer should be clearly identified to ensure that the approved buffers are being enforced. Please also indicate specific dates for the breeding bird window that will be adhered to.*

Response 8. Section 5.2.3.5 has been revised to read, "Temporary vegetation protection fencing will be installed at the edge of the proposed clearing limits prior to any tree cutting. This fencing will be installed along the buffer limits, as well as around trees to be retained that are located outside the buffer limits. This fencing will delineate the clearing limits and prevent further intrusion into the adjacent habitat. Prior to vegetation removal, tree protection fencing will be inspected to ensure all vegetation to be retained is protected."

Comment 9. *Section 5.3 Green Space Corridor – Recommendation 6 should also highlight the need for denser planting arrangements over standard tree and shrub planting plans in this area that will promote vegetation connectivity. The road crossing located in this area should also include design elements that provide fewer barriers to wildlife movement between the habitats (i.e. narrow road, reduced curbs and curb shape). More discussion is needed to clearly demonstrate how this will actually act as a corridor for wildlife given the urban pressures around it.*

Response 9. Recommendation 6 is actually Recommendation 7 (a typo). Additional text within Recommendation 7 includes the following, "To promote connectivity, this area should be planted at a higher density than the buffer areas. The road that crosses the green space corridor should

incorporate design elements to encourage wildlife movement (i.e. narrow road, reduced curbs and curb shape). Also animal crossing signs should be installed within this area."

Comment 10. *Section 5.6 Environmental Monitoring – This section does not identify who will be responsible for implementing this monitoring plan. Monitoring should be carried out for a minimum of 3 years post construction by the developer. Monitoring reports need to be included on a yearly basis and specific goals and objectives need to be identified for outcomes that will require action if they are not being met.*

Response 10. The last bullet of Section 5.6 has been revised as per the following, "Annual reporting of monitoring results to the City of London for a period of 3 years following construction by the developer. Annual monitoring reports will be submitted on a yearly basis and include specific goals/objectives that will require action if they are not being met."

Comment 11. *Section 3.1 Land Use Plan – Please overlay the Draft Plan of Subdivision on an aerial photo that contains all of the constraints and opportunities shown in Figure 2 and Figure 5 of the EIS. Clearly label and show the various buffer widths adjacent to the proposed development.*

Response 11. Buffer width measurements have been included within Figures 2 and 5. All of the information on Figure 2 is also on Figure 5, along with the Draft Plan of Subdivision.

As indicated the above comments have been addressed in a revised EIS report, submitted with this letter.

Should you have any questions or concerns, please do not hesitate to contact me via e-mail at Gary.Epp@aecom.com or by phone 519-650-8693.

Sincerely,
AECOM Canada Ltd.



Gary A. Epp, M.Sc., Ph.D.
Director of Ecology,
Ontario Environment
GE:ge

cc: Bruce Page City of London
Larry Mottram City of London



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Kitchener, ON, Canada N2P 0A4
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February 11, 2015

VIA EMAIL

Maureen Zunti
Sifton Properties Limited
195 Dufferin Avenue, Suite 410
London, Ontario
N6A 4M8

Dear Ms. Zunti:

Project No: 60120375

**Regarding: Riverbend South Secondary Plan & Phase 1 Plan of Subdivision
Environmental Impact Study**

The following provides a response to comments received from the Upper Thames River Conservation Authority (UTRCA), dated January 27th 2015, regarding the Riverbend South Secondary Plan Environmental Impact Study (July 25, 2014).

Buffers

Buffers to Protect Woodland Integrity – The existing development on the east side of the Warbler Woods Environmentally Significant Area (ESA) is not comparable to the proposed development for Riverbend South. The existing development on the east side of Warbler Woods ESA has encroached into the ESA and does not appear to have any buffers from the mature woodland in the ESA. The proposed Riverbend South development is set back from the ESA with buffers ranging between 18 and 28 meters. Additionally, significant areas have been included in the ESA by enclosing embayments along the previous ESA boundary and including a projection.

With the implementation of the recommended buffers and the enhancement recommendations, we are confident that the woodland integrity, habitat for Species of Concern, including Species at Risk (SAR), and seepage areas will be more than adequately protected.

Isolated/Remnant Woodland Protection - In December 2014, the dripline of the isolated woodland patch was surveyed. This surveyed dripline as well as recommended buffer setbacks have been included within Figures 2 through 5 within the updated EIS report. Also, the language within the updated EIS document has been changed to refer to the remnant woodland as "isolated woodland" or just "woodland." As well, the buffer section has been updated to include setback recommendations for the isolated woodland

With respect to the evaluation of the isolated woodland, we have considered the comments provided by UTRCA and have reviewed the evaluation in light of those comments. We have accepted some of

the comments resulting in 3 medium scores and a Non-significant overall evaluation. We do not agree with the patch being indirectly connected with Hickory Woods. Data for the basal areas used in scoring 4.1b is provided in the report.

Plantation

We should note that the issue of delineation of the Warbler Woods ESA and the plantation has been addressed and resolved with the City of London.

Application of Guideline 8b – We disagree that inclusion of the entire plantation would be required to minimize edge effects. We have, by means of buffer recommendations, included some plantation area which will contribute to the required buffer capacity along the ESA edge.

Evaluation of the Plantation as a Woodland – As part of the ESA delineation process, the plantation was considered for inclusion in the ESA. We do not believe it to be appropriate to then apply another set of guidelines to the same feature to then determine if it is significant according to another set of guidelines. We have addressed this issue in the Riverbend South Secondary Plan Natural Heritage Study Report (December 11, 2013).

Corridor & Trails

Corridor Width & Road - The open space connection between Warbler Woods ESA and Hickory Woods Significant Woodland is intended to be a Pedestrian/Greenspace Linkage. While some level of wildlife passage will be facilitated by this linkage, it is not expected to function as a primary wildlife corridor. This is largely due to the City of London Transportation Department's requirement for a road connection between Warbler Woods Walk subdivision and the proposed development.

Trail Placement – The placement of a multi-use pathway will be situated to avoid any risks associated with hazard trees. Likewise, the removal of hazard trees will be considered for any areas where informal trails are present along the ESA boundary.

Additional Requested Information

Byron Woods ANSI – The Byron Woods Regionally Significant Area of Natural and Scientific Interest (ANSI) was not included originally as we were showing features identified on Schedule B-1 of the City of London's Official Plan (only Provincially Significant ANSIs are shown on Schedule B-1). To our knowledge the ANSI boundaries have not changed.

Figure & Text Edits & Clarifications – We have made most of the suggested edits to our Environmental Impact Study Report (revised February 2015), however, we have not made edits to the Natural Heritage Study Report.

Wetland Creation – The wetland feature recommended for the buffer zone along the ESA boundary is intended to be an ephemeral wetland that will be supplied with surface water from the existing catchment area and can be supplemented with roof leader run-off. We have recommended that it be

lined with a clay substrate. The details for the implementation of this wetland feature can be provided at the detailed site plan stage.

FOD 2 Community – The FOD 2 community will be protected within the Significant Woodland and its buffer. There may be a requirement to remove hazard trees in this area as not all the trees are “windfirm”.

Significant Wildlife Habitat Assessment – A Significant Wildlife Habitat Assessment was conducted as part of the Natural Heritage Study and is documented in the study report.

Vegetation Surveys – Vegetation surveys were conducted in spring, summer and fall, with the exception of July. Although not noted in the field investigations summary table, our field staff conducts a vegetation survey each time they are on site. In other words, when a bird survey is being conducted, additional data such as vegetation species is recorded during that site visit. Additionally, vegetation data is collected during site visits not recorded in the summary table (i.e. when staff are attending the site during site meetings and to collect data for the development of management recommendations.

Past Tree Removal – Tree removal conducted in 2012 did not require a tree cutting permit in accordance with the Tree Conservation By-law. The removals shown on Figure 4 occurred prior to Sifton Properties acquiring the subject lands. We are not aware of the timing of that removal or whether a permit was obtained.

Some of the above comments have been addressed in a revised EIS report, submitted with this letter.

Should you have any questions or concerns, please do not hesitate to contact me via e-mail at Gary.Epp@aecom.com or by phone 519-650-8693.

Sincerely,
AECOM Canada Ltd.



Gary A. Epp, M.Sc., Ph.D.
Director of Ecology,
Ontario Environment
GE:ge

cc:	Christine Creighton	UTRCA
	Bruce Page	City of London
	Larry Mottram	City of London



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VIA EMAIL

Maureen Zunti
Sifton Properties Limited
195 Dufferin Avenue, Suite 410
London, Ontario
N6A 4M8

Dear Ms. Zunti:

Project No: 60120375

**Regarding: Riverbend South Secondary Plan & Phase 1 Plan of Subdivision
Environmental Impact Study**

The following provides a response to comments received from the City of London's Ecological and Environmental Planning Advisory Committee (EEPAC), dated November 2014, regarding the Riverbend South Secondary Plan Environmental Impact Study (July 25, 2014).

It should be noted that many of the comments have been addressed in our responses to the City of London's Environment and Parks Planning Department's comments, dated February 9, 2015, and Upper Thames River Conservation Authority's (UTRCA) comments, dated February 11, 2015. Revisions reflecting those responses have also been made and are provided in an up-dated Environmental Impact Study report dated February 2015.

The following responses are presented according to headings, or themes in EEPAC's memorandum.

Missing Elements

Vernal pools – The location of the two vernal pools is shown on Figure 4 of the Natural Heritage Study report, dated December 11, 2013. The location of both pools is shown as one due to the scale of the mapping and proximity of the two pools to each other.

Soil pit data – The soil pit data is provided in Section 2.3 pages 14-16 of the Natural Heritage Study report. The location of the pits is indicated on Figure 3 of the same report.

Development Plan lotting layout – A revised figure showing the lotting layout for the Phase 1 Plan of Subdivision is provided in the revised EIS report. Specifics regarding proposed tree retention will be provided in a Tree Preservation Plan, at the Site Plan / detailed design stage of development planning and approvals.

Figure 4 has been revised in the up-dated EIS report.

Preamble

Potential impacts on groundwater – Potential impacts to groundwater have been assessed as part of the Tributary “C” Stormwater Management Class Environmental Assessment (Class EA) and by Golders as a part of the present application. No significant potential impacts to groundwater have been identified in relation to the proposed development.

Development Limit – The proposed development limit has been the topic of considerable discussion, assessment and responses between Sifton Properties and the City of London. The boundary of the Warbler Woods Environmentally Significant Area (ESA) and its buffers have been delineated in accordance with the City of London’s Environmental Management Guidelines (2007) and are documented in the Natural Heritage Study report (December 11, 2013). Sifton Properties and the City of London are in agreement with respect to the ESA boundaries and recommended buffers as documented in the up-dated EIS report.

Monitoring of Tributary “C” – Any monitoring of Tributary “C” flows or thermal regime will be a requirement of the development and construction of the Tributary “C” stormwater management facility, led by the City of London.

Theme #2 – Butterfly Habitat and Native Planting of Buffers

The intent of the “Meadow Enhancement for Butterfly Habitat” of management zone recommendation is to provide habitat for butterflies and other pollinators, including the Tawney Skipper. The species list provided is appropriate as a preliminary list. This recommendation will be further detailed and refined in enhancement planting plans that would be part of the requirements of Draft Plan Approval and requirement of overall site monitoring.

Theme #3 – Enhancement Areas, Buffer Management Zones, Boundary Delineation and Tree Retention

Wetland Creation – The intent of the created wetland is to provide additional amphibian breeding habitat due to the limited availability of habitat in the area. This recommendation is in addition to the protection of the vernal pools situated within the Warbler Woods ESA,

Open Space Corridor – The Open Space Linkage between Warbler Woods ESA and Hickory Woods Significant Woodland is primarily a recreational connection through which a multi-use pathway will be constructed. The need for the pathway and the bisection of the linkage by a local street significantly limits the functionality of this open space as an ecological corridor. The open space will, however, provide some breeding birds and small mammals with an opportunity for movement between the two natural heritage areas.

Hickory Woods Significant Woodland Buffer – The recommended buffers for Hickory Woods are based on protection of the largest trees along the woodland boundary and their rooting zones. These buffers are more than sufficient for protection of the woodland and the uncommon community within. It should be noted that some additional open space is being provided along the local street adjacent to the Hickory Woods Significant Woodland buffer on the southeast side.

Buffer Implementation & Planting – The implementation of the buffer recommendations and the planting of the buffers will be detailed in landscape planting plans. Monitoring requirements will also be included in Draft Plan Approval requirements.

Theme #4 – Trail Management

Multi-use Pathway Routing – The routing of the multi-use pathway is intended to continue from the existing City of London multi-use pathway through the Warbler Woods Walk subdivision. The intent is to follow the ESA buffer to the point of the open space linkage where it will be situated along open space corridors, parks and streets. Multi-use pathways within the proposed development will be designed to City of London Trail Standards.

Theme #5 - Construction Impacts and Site Alteration

Construction Mitigation – Detailed construction mitigation requirements will be provided for contract documents as recommended in the EIS report.

Theme #6 – Direct and Indirect Impacts from the Development

ESA Protection, etc. – Recommendations provided regarding ESA protection and lighting is noted. The provision of a Homeowner's Manual will likely be a requirement of Draft Plan Approval.

Tree Replacement – The removal of plantation trees does not require replacement and no such discussion has taken place with the City. Notwithstanding this, we have recommended tree and shrub plantings within buffers, enhancement areas and the open space corridor to increase tree cover in the development area. This does not include the many trees that will be planted in park areas, along street boulevards and along multi-use pathways.

Theme #7 – Species at Risk

Wood Thrush – We agreed that status indicated for Wood Thrush was in error.

Bird Survey Stations – Bird survey stations were changed between survey years due to the change in vegetation and crops at the station locations (i.e. stations previously occurring as meadows were corn fields in the subsequent years, therefore, maintaining the station location was not appropriate).

Theme #8 – Miscellaneous Errors and Omissions

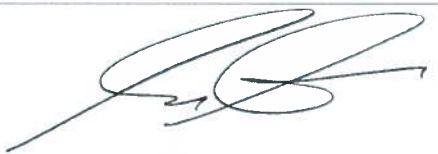
Watercourse – No watercourse exists between the property boundary and the pines.

Tributary "C" – Tributary "C" is noted in the Regional and Watershed context of the Natural Heritage Study. We agree that this should have been addressed with greater discussion.

As indicated the above comments have been addressed in a revised EIS report, and in responses provided to the City of London and UTRCA.

Should you have any questions or concerns, please do not hesitate to contact me via e-mail at Gary.Epp@aecom.com or by phone 519-650-8693.

Sincerely,
AECOM Canada Ltd.



Gary A. Epp, M.Sc., Ph.D.
Director of Ecology,
Ontario Environment

GE:ge

cc: Bruce Page City of London
Larry Mottram City of London