

Review of EIS Update by Biologic, dated May 8, 2018 and exp Hydrogeology report dated April 2018.

Both received at EEPAC's July 2018 meeting

Reviewed by S. Levin, R. Trudeau and I. Whiteside

The key concern for the working group remains the surface flows from Patch 10066 (identified now as a Significant Woodland) to Patch 10069 (also Significant). Both the EIS and the hydrogeological report agree that maintaining this seasonal flow is important to maintain the features and functions of Patch 10069. What is missing from both reports is how this can be accomplished, particularly without the completion of the Dingman Creek Subwatershed Study update currently underway.

RECOMMENDATIONS

1. A holding provision be applied to require approval of the City Engineer or designate and the UTRCA of the design of the system proposed to maintain the seasonal surface flows to Patch 10069, both in terms quantity and quality (e.g. page 34, Recommendation 1, page 36, etc). EEPAC further recommends that this system remain in public ownership so that maintenance remains a municipal responsibility rather than future individual home owners. The design must include the areas to the southwest that are part of the flow regime to the P9 SWM facility as well as Phase 2 of the Sifton development to the north and the remaining part of the York property, particularly as no aquatic habitat site investigations relative to the flow channel under and west of Colonel Talbot Road were carried out (see page 16).
2. EEPAC strongly opposes the suggestion that the compensation for the small wetland at the southwest corner of the property be within Patch 10069. EEPAC recommends the area be where the City has proposed it (adjacent to Patch 10069) or created on the boundary between this property and the property to the north where other wetland replacement is being proposed. In this way, a larger, more functional wetland would be possible.
3. The working group is also concerned about access to Patch 10069 prior to development of the lands to the south. Although there will be fencing of backyards in the W3 Farms development, the southern part of this patch will remain accessible. The working group recommends the City gain ownership of this woodland earlier rather than later so that a sustainable trail system can be created (preferably outside the woodland) prior to the people creating their own, harming the wet features and the endangered butternut tree which is to be retained and requires protection.
4. EEPAC recommends education signage be installed at appropriate points (e.g. Recommendation 29, page 42) near the ecological features as a constant reminder of the significance of the features. EEPAC does not believe the one time owner education

packages are effective. EEPAC supports Recommendation 27 on page 41 for sign plaques on the fences within individual lots.

5. EEPAC recommends the environmental monitoring strategy mentioned on page 42 be a condition of development that requires approval of a City Ecologist. EEPAC also recommends that any monitoring program start with the first year of construction and not end until the third year after substantial completion of the subdivision.

ADDITIONAL COMMENTS

There were a number of inconsistencies (e.g. p. 13, 26) in the EIS update such as whether or not Patch 10066 had been studied and who did the site work. However, EEPAC is in agreement that this patch meets one High criterion from the woodland evaluation guideline document and is therefore a Significant Woodland to be retained (Table A, page 27).

The field sheet includes notations about raptors and ribbon snake (Special Concern Species) habitat, however there is no discussion of these findings and their significance in the report.

With respect to storm water management, the report notes that storm water from Areas 2 and 3 are "tributaries" to the SWMF P9, which presumably means storm water from these areas will drain to that SWMF. However, Area 1, which drains to the east (presumably to Thornincroft Drain) "private permanent treatment" is proposed for storm water. Additionally, run-off from Area 1 is expected to increase 171% without mitigation measures. We have two concerns:

- a. No details on the private treatment system were provided, specifically with respect to water treatment/quality parameters and flow volumes.
- b. The report presents these as annual average increases in run-off, but does not indicate what will happen during major and minor flows. As run-off from the subdivision will mostly occur during storm events, and the report does not evaluate the impact of elevated storm water run-off on Thornincroft Drain (and ultimately Dingman Creek) as a result of these storm events.

We recommend that the report further evaluate the impact from increase in surface water flow from the site to Thornincroft Drain and Dingman Creek during major and minor flow events. If the evaluation fails to demonstrate that overall water quality will be improved or at minimum maintained to pre-development conditions, additional mitigation measures should be considered.

The report also mentions the implementation of LID measures to promote post development infiltration to a target of 80% of the predevelopment infiltration; LID measures may presumably also form part of the storm water management system for the site by acting to retain storm water. We recommend that LID measures, particularly LID measures that form part of any storm water management system be placed on public property, as the eventual homeowner may lack the desire or skill in maintain the LID measures and run-off may consequently increase over time as the efficacy of the LID measures wane.