

October 26, 2018

City of London
Environmental and Ecological Planning Advisory Committee (EEPAC)
300 Dufferin Avenue
London, Ontario
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Attention: Heather Lysynski
Secretary, Environmental and Ecological Planning Advisory Committee

***William Street Outfall
Class Environmental Assessment and Environmental Impact Study
Response to Comments Provided***

This letter provides an update on the William Street Outfall Class Environmental Assessment (EA) and responds to EEPAC's comments on the William Street Outfall Draft Environmental Impact Study (EIS). The project was presented at the April 2018 EEPAC meeting.

Subsequent to submitting the Draft EIS for review, the project was revised to include the potential decommissioning/abandonment of Watermain Chamber 13, located just west of the channel (see attached **Figure 2**). Immediately north of the low flow channel, there is an existing 600 mm watermain. The watermain is connected to Chamber 13. The existing maintenance road is in place to provide access the chamber.

The City is planning to abandon and relocate the 600 mm watermain so that is no longer within Huron Street Woods. The new watermain would be located along a municipal road right-of-way, providing improved access for maintenance activities. When the watermain is relocated, Chamber 13 would be abandoned. As a result, the existing maintenance road and associated culvert would be removed and the area restored to be consistent with the surrounding landscape. The details regarding the watermain relocation are still being finalized, including timing of the work.

The EIS has been updated to document existing conditions in the vicinity of the watermain chamber and includes a commitment to restore the area following construction.

Response to comments received:

EEPAC RECOMMENDATION 1: The proposed Invasive Species Management Plan mentioned on page 28 of the EIS includes a buckthorn herbiciding program within the project budget for the city lands north of the channel within the study area.



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Study Team Response to Recommendation 1: The EIS has been updated to include an Invasive Species Management Plan (ISMP) within the document, with steps to address the Phragmites and Buckthorn. The ISMP is consistent with and references the London Invasive Plant Management Strategy. Methods for control are referenced from the applicable Best Management Practice documents for the target species from the Ontario Invasive Plant Council and the Ministry of Natural Resources and Forestry (MNR), as well as recent 2017 technical bulletins from the OIPC. The EIS has been updated to more widely define the areas subject to the ISMP, which now includes the approximate footprint of the project work areas plus a surrounding 30 m buffer (shown as the study area on **Figure 3** of the EIS).

EEPAC RECOMMENDATION 2: The proposed Invasive Species Management Plan include eradication of phragmites.

Study Team Response to Recommendation 2: The Invasive Species Management Plan included in the updated EIS addresses the patch of Phragmites in the former pond adjacent to the channel.

EEPAC RECOMMENDATION 3: The project budget include sufficient funds for monitoring of at least five years of the success of the site restoration and invasive species removal and control programs.

Study Team Response to Recommendation 3: The EIS recommends a monitoring period for a minimum of three years and up to five years. The EIS notes that, if appropriate, the monitoring of restoration works and follow-up monitoring of the ISMP may be conducted by the City as part of the existing parks and open space invasives monitoring.

EEPAC RECOMMENDATION 4: EEPAC receive the Plan for review and annually, receive a report on the progress of the implementation of the Invasive Species Management Plan. EEPAC has yet to see any invasive species management plans despite many have been included as “to be developed and implemented” in many an EIS. Given this is a City project, there is an opportunity for EEPAC to provide its expertise in this matter as one of the current members of EEPAC is a PhD in plant biology and has extensive experience with management of some invasive species.

Study Team Response to Recommendation 4: The Invasive Species Management Plan included in the EIS will be followed during this project and a licensed contractor will be hired to perform a treatment of the invasive species.

EEPAC RECOMMENDATION 5: The culvert that is 90% blocked by debris be cleared as this will remove a barrier to fish passage and regular inspections take place to ensure the culvert remains clear.

Study Team Response to Recommendation 5: City Sewer Operations have been notified about this blockage and the appropriate action will be taken to clear it.

RECOMMENDATION 6: The project include monitoring of water quality in the Thames pre and post construction for a period including three years from the conclusion of the separation of the combined sewer.

Study Team Response to Recommendation 6: Monitoring of the Thames River is not typically required for this type of project. The final outcome of the sewer separation upstream will improve the water quality in general.

RECOMMENDATION 7: EEPAC would appreciate a response from a City Ecologist on this matter.

Study Team Response to Recommendation 7: Migratory bird survey data were reviewed from recent (2014) breeding bird surveys conducted for the Thames Valley Parkway (TVP) project, the study area of which overlaps with the study area for the current project. Therefore, the existing bird data were sufficient to provide a representative assessment of bird populations in the area for the current project. The results were incorporated into the EIS. The use of TVP bird data for the current project was approved in the project scoping consultation.

EEPAC Comment: If beavers return to the area, will the City implement its current protocol for beavers?

Study Team Response: Yes, if the beavers return to the area, the City will implement its current protocol for beavers.

EEPAC Comment: It is unclear why only one amphibian survey spot selected. This is inconsistent with the Marsh Monitoring Protocol. There are many frogs in the area - you can hear them and see tadpoles.

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Study Team Response: One survey location was established near the outfall. The use of this one station is consistent with the MMP, which specifies that stations are to be spaced 500 m apart, thus encompassing a 250 m survey radius, to avoid overlapping study areas and double-counting observations. The one survey location near the outfall provides a 250 m survey radius that encompasses the entire study area of the outfall work.

With the addition of the Chamber 13 removal work, results from a second survey station (already conducted with previous ABH surveys) were added into the EIS. This second survey station encompasses the study area for the Chamber 13 work, consistent with the MMP. Results from surveys at this second ABH station did not indicate the presence of calling amphibians.

EEPAC Comment: EEPAC continues to believe that the entire area west of Adelaide as studied by Dillon and by Duggan should be included in Map 5 as ESA.

Study Team Response: Comments from EEPAC noted.

Sincerely,

DILLON CONSULTING LIMITED



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for Jason Johnson, P.Eng.
Project Manager

SSW:all
Enclosure

cc: Paul Yanchuk, City of London

Our file: 16-4038