

6019 HAMLIN STREET sub division, EIS by Natural Resources Solutions, Inc., dated August 2018, received by EEPAC on October 18, 2018

Reviewed by B. Krichker, S. Levin, R. Trudeau, I. Whiteside

Submitted to November 15, 2018 EEPAC meeting

Northern part of East Lambeth ESA.

**RECOMMENDATION: Given this site and other sites adjacent to this ESA are owned by the proponent, this represents piecemeal planning. Good ecosystem planning should require a look at the entire ESA and define buffers ahead of all applications.**

#### POSITIVES

– Recommendation for signage in public areas in addition to the standard homeowner’s booklet. This is supported by EEPAC.

-Agreement by proponent to retain the wooded link between the ESA and the other wetland/woodland on the site

#### MAIN ISSUES –

##### **Hydrology and Storm Water Issues – details to follow**

**width of encroachment into 30 m wetland buffer and 10 m woodland buffer by a number of properties (6 back yards and a multi-use pathway that is not only in the buffer but is thru the ESA in violation of the principle “to not thru an ESA”).**

Although it is interesting that there is an area of buffer compensation, it is the distance from the feature NOT the amount that is relevant. As area compensation ignores the critical function zone (see How Much Habitat Is Enough, Environment Canada, particularly 2.1.5 and)

[https://www.ec.gc.ca/nature/default.asp?lang=En&n=E33B007C-1#\\_02\\_1\\_4](https://www.ec.gc.ca/nature/default.asp?lang=En&n=E33B007C-1#_02_1_4)

*Protection Zones should protect the wetland attributes from stressors. Recommended widths should consider sensitivities of the wetland and the species that depend upon it, as well as local environmental conditions (e.g., slopes, soils and drainage), vegetative structure of the Protection Zone, and nature of the changes in adjacent land uses. Stressors need to be identified and mitigated through Protection Zone design.*

**RECOMMENDATION: As per How Much Habitat is Enough, Critical Function Zones should be established around the wetlands based on knowledge of species present and their use of habitat types.**

Lots 91-92 have no woodland buffer and only 20 m wetland

Lots 65-66 have only 12.5 m wetland buffer by our measurement

From the medium density, the wetland buffer is as small as 8 m

Lots in the NW where the buffer is IN the backyard, there is only 12.5 m and part of that buffer appears to have a 3 m wide multiuse pathway that would be mowed at least 0.5 m on each side.

**RECOMMENDATION: The minimum buffer from the wetland must be 30 m and 10 m from woodland features. This must be put in place for the entire patch which constitutes the East Lambeth Forest ESA (see attached pages from the SWAP Natural Heritage Study)**

Unclear rationale (page 24) for excluding parts of the wetlands on the west side from the ESA. Given that they are not developable anyway, why are they excluded? It is noted that Frequency occurrence of MAM (Meadow Marsh) in London is only 5.6% and SWT is only 8% (Bergsma and DeYoung – 2006)

**RECOMMENDATION: All wetlands must be included in the ESA and designated Green Space as per the London Plan.**

The “sliver” of future development in the SE appears to be forced and fanciful. Why not make it part of the renaturalization plan?

There is no detail about the re-naturalization plan – when might it be produced and how would a City Ecologist be involved in its review?

Not clear why buckthorn on adjacent property means that no effort will be made to reduce buckthorn (page 39). Isn't much of the adjacent property to the south owned by the same proponent?

There is mention of a re-naturalization plan for the buffer on page 36-37 with no details other than “dense plantings” mentioned on page 39. At a minimum, a condition of approval must be the preparation of a re-naturalization plan to the satisfaction of the City and UTRCA and that such plan be implemented as soon as possible, so that the plants have a chance to mature.

**RECOMMENDATION:**

- **The EIS be considered incomplete until a specific re-naturalization plan including buckthorn management is included.**
- **Alternatively, a specific re-naturalization plan be a requirement of the subdivision agreement**

**RECOMMENDATION: The subdivision agreement include fencing with no gates where private property will abut the ESA or wetland features**

#### **CONSTRUCTION RECOMMENDATIONS**

To minimize construction impacts, all forested and wetland areas must be fenced during construction the intent being to reduce the amount of waste from the site blowing into the natural areas.

EEPAC agrees that refueling and marshalling of equipment must be at least 30 m min from natural features.

#### **PHRAGMITES RECOMMENDATION**

Phragmites should be dealt with either by the proponent or the City depending on when Wonderland Road is widened. If widened first, the City project should deal with it. It is unclear at this time if the herbicide that would be most effective has been approved for use in a watercourse. If not, and a special

permit is required, the City (or Upper Thames) should be responsible for its use with payment coming from the proponent.

#### **POST CONSTRUCTION RECOMMENDATIONS**

It must be made clear in the subdivision agreement when the monitoring period starts, which seasons monitoring will take place, who is responsible for monitoring, and how reports will be shared with the City. There should be a holdback to pay for any re-plantings that would only be released after the end of the monitoring period. The triggers for monitoring to start should be by the advancement of the subdivision.

The City should send each residence "Living with Natural Areas" 6 mons after the subdivision is 70% completion and again when the multi residential block is 70% occupied.

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