

Review of: **Applewood Hills – Sergautis Lands**  
**660 Sunningdale Road East**  
**Environmental Impact Study**  
as prepared by BioLogic; dated April 2010  
updated by BioLogic EIS Addendum Letter dated May 31, 2012

Reviewers: D. Sheppard. October 2012

### **ESA Patch 3044 – Establishment of pre-cut boundary and buffers**

EEPAC understands the Addendum to propose that the limit of the woodland would be established according to the woodland edge that existed in 2005 before measures contrary to Good Forestry Practices reduced the size of the woodland. While it is important to respect the original size of the woodland, it is also important that the Natural Heritage System not be diminished by these poor management practices and ultimately that no benefit be derived by the developer as a result of these practices. Had the woodland never been improperly cut, the current EIS would be proposing some form of ecological buffer to protect and enhance the woodland edge. Now, no buffer at all is being considered because of the other woodland restoration that is required.

- 1) The City should be requiring not only the respecting of the original woodland limit but also requiring a buffer as would have been the case had no improper cutting been executed. This is a point of principle. EEPAC would expect a nominal buffer of 5m to be set aside in addition to the restoration of the original woodland.

### **ESA Patch 3044 – Woodland Restoration**

It is not clear from the EIS Addendum that a specific restoration plan will be prepared and executed.

- 2) EEPAC recommends that the completion of a restoration plan, and approval of the plan by a City Ecologist Planner, be a condition of draft approval. The plan must include invasive species management.
- 3) EEPAC requests to be circulated on the proposed restoration plan. This is an area of the process EEPAC rarely gets any transparency into.

### **Patch in NE Corner of Subject Lands**

As indicated in our July 2010 EIS review, EEPAC seeks clarification regarding the woodland evaluation conducted for this patch. Specifically, it must be clarified that the evaluation was conducted on the entire patch and not solely on vegetation communities 12, 13, 14 and 15. EEPAC can not currently determine if these communities are part of a larger patch or not because the remainder of the patch may lie outside the City boundary.

- 4) If the woodland evaluation can not be proven to have been fully and properly completed, it needs to be redone.
- 5) If the patch straddles the City/County boundary, there is likely data available from the County regarding the patch which can be used to conduct a properly scoped evaluation.

**Tree Preservation**

- 6) Tree Preservation reports should be required for all vegetation areas with the subject site that are not currently proposed for retention.

/end