

White Oak-Dingman Secondary Plan
Draft Subject Lands Status Report Prepared By:
Parsons (September 2019)

Reviewed for October 2019 EEPAC meeting by: L. Banks, R. Doyle, S. Esan, S. Heuchan, S. Levin, I. Mohamed

Summary Recommendations:

An EIS be required for any developments adjacent to any environmental feature including all wetlands and all confirmed and candidate Significant Wildlife Habitat as per the distance table in the London Plan. This should include amphibian surveys on the properties to which access was not granted to the consultant.

Any wetland relocations must be to areas that have sufficient water resources to maintain wetland function as development lowers water tables.

The area between WE-8 and WE-23 shown on Figure 8 be incorporated into the Significant Woodland feature, either as part of a recreated wetland or revegetated to provide meaningful ecological features and functions. This would also compensate for the earlier destruction of Patch 10099 and the recent filling in of wetlands found in the northwest section of the study area.

The City **must** take action now to identify replacement habitat for lost Eastern Meadowlark habitat at this and other sites in the Southwest. Replacing habitat is a Provincial requirement. Given the many sites already identified for development or road widenings, the need is urgent.

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RECOMMENDATION #1 – An EIS be required for all developments proposed within the distance limits outline in the OP (table 15.1) and The London Plan (Table 13), unless a comprehensive EIS is undertaken for the entire Area.

Rationale

As noted on page 7, Section 3.4 of the document, it important to note the comment under Table 2 - only half the site was surveyed. Much information about the wetlands, therefore, is missing.

On page 28, Section 7, there are a number of recommendations that speak to "a" EIS. However, given the variety of land ownership, how will a comprehensive, area-wide determination be done? The city should encourage the landowners to co-operate in the preparation of one EIS for the Area. Not doing so is contrary to ecosystem planning which is a goal of the subwatershed studies done for the Dingman Creek Sub-watershed.

p. 14 two bat species found thru acoustic surveys. Neither SAR (surprisingly given the decline of bat populations). Cavity trees should be retained.

5.4.1 and page 21, Candidate Raptor Wintering Area - Parsons recommends winter studies at later stages as none done for SLSR. EEPAC agrees but is concerned how this will be captured at the EIS stage when it is individual landowners and not the city responsible?

Page 15, 5.1.1, Further refinement of the significant valleyland boundary is recommended for future development projects as part of an EIS. This must be captured by the city as a condition of development requirement. Who is in charge of doing so? How will this requirement be captured when lands are proposed for development?

Vegetation surveys - EEPAC also believes that spring vegetation surveys done for an EIS should be earlier than May 29th in order to identify any spring ephemerals

Breeding Birds - The following should be used to determine when breeding bird surveys should take place. It appears to EEPAC that the dates of the surveys having been June 14 and June 29, were late. <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/general-nesting-periods/nesting-periods.html>

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WETLANDS

RECOMMENDATION # 2 (p. 19, 5.3)

What appears to be missing in this study is the source of the water for the wetlands. A water balance and hydrogeological work must be done during any EIS to determine the best location for any wetland relocation. There should be a comprehensive geotechnical and hydrogeological study of the Area before the Plan is completed. If landowners do not give PTE, then they should be required to do such work on individual parcels at their own costs however, a comprehensive study undertaken by the city would be better and more complete way to determine if the pre and post water balance is within 80%.

RATIONALE

5.3, page 20

Based on their size, the wetlands found within the Subject Lands do not qualify for evaluation individually under OWES, however, the wetlands are within 750 m of each other and may be considered as a 'complex' and evaluated as a single unit. Furthermore, several wetland communities were not field verified and further ground-truthing and boundary delineation would be required. Those that were not evaluated, are they within 750 m and should be complexed? Is there a hydro geological connection? How this will be addressed in future EIS work is unclear to EEPAC.

SIGNIFICANT WOODLAND

Recommendation #3 - p. 11, 4.2.2, when an EIS is scoped for development adjacent to the Significant Woodland, the Environmental Management Plan must include a detailed invasive species management plan and a detailed woodland management plan to the satisfaction of the City.

Recommendation #4 - The odd boundary on the east side of the Significant Woodland is not conducive to ecological function. There must be more of a "link" from the wetland portion to the easternly section as shown in Figure 11 of the SLSR.

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RATIONALE

A narrow amphibian movement corridor will likely not work and there will be no future opportunity to expand it or replace it post development. As such, the SWH section of the SLSR only mentions future EIS work to determine if they exist. Seems that they should be created if not already there.

5.4.1 page 21, confirmed SWH for amphibian breeding in City owned lands near Shamrock Road. Candidate SWH for the private lands. There is also a candidate amphibian movement corridor.

Given the past destructive nature of a landowner (loss of Patch 10099 and wetlands in the northwest section of the site), how will the candidate areas be protected until survey work can be done as part of an EIS? Given the history of activity against natural heritage in the area, what will be done to ensure these ecosites are protected and properly surveyed during an EIS?

Landowners should be put on notice that there will be consequences for alteration of lands prior to development approvals.

MEADOWLARK / BOBOLINK HABITAT

RECOMMENDATION #5

The City start a comprehensive effort to set aside enough land to compensate for the continuing loss of Meadowlark habitat from city and private projects. A number of projects including this one, the widening of Southdale Road, the White Oak - Dingman Drive intersection have all identified breeding meadowlark. Without a comprehensive effort, in short order, all available lands will become unavailable for replacement.

RATIONALE

Table D1 and Figure 5 and p. 25 -
Eastern Meadowlark, adults and fledglings, in meadows on west side of site AND east side in City owned lands (although page 26 does not say so). This is a threatened species for which habitat compensation is required under Endangered Species Act.

The SLSR also identified savannah sparrows. Open Country Breeding Bird Habitat confirmed! This is very unusual in the city. What will be done to protect or compensate for the loss of over 30 ha of Significant Wildlife Habitat?

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OTHER

RECOMMENDATION #6

The City should move to amend London Plan and existing OP now as recommended in the SLSR as shown in Figure 12, as well as put the “square” between WE-8 and WE-23 into Environmental Review, pending a decision on compensatory mitigation and wetland relocation.

FUTURE ROAD WORKS

R2, consultant notes possible connection for amphibians thru culvert. How will this be captured in future studies?

TEXT to be EDITED

Crayfish are not insects as stated on page 15 at the top

5.4.2, page 22

"There were wetlands in the **eastern** portion of the Subject Lands property that had been filled in" (see Figure 8, Appendix A)

Should this say **western**??