

435-451 Ridout Street, London Ontario

Final Preliminary Environmental Impact Study

Prepared for: Farhi Holdings Corporation, 484 Richmond Street, Suite 200
London, ON N6A 3E6

Prepared by: Natural Resources Solutions Inc.

Project No. 2161 – July 2019

Reviewed for EEPAC by: Ian Arturo, Susan Hall & Brendon Samuels, 08 Mar. 2021

General Comments: A proposed multi-use development is planned on a, roughly rectangular in shape, approximately 1.4ha plot of land, bordered by Harris Park to the north, Ridout Street North to the east, Queens Avenue to the south, and a small access road to the west, which borders the North Thames River. The property contains parking lots, existing heritage buildings with established businesses, manicured lawn, and small cultural natural areas. A large portion of the subject property is identified as being within the floodplain and regulated area by the Upper Thames River Conservation Authority (UTRCA).

“The primary objective of the Environmental Management and Monitoring Plan is to restore the function and structure of features which are removed and to enhance any areas on-site. It is proposed that this brownfield site be remediated, as well as the non-natural fill materials be excavated from the bank. There is opportunity to stabilize the bank and re-naturalize it with native species through new landscaping.” (p. 37).

Recommendation 1: Support the Landscape plan described on p. 24 and the outlined process to identify species to plant and invasive species to remove. All applicable City, Provincial, and Federal regulations must be followed this is a Brownfield site. Ontario Records of Site Condition regulations for Brownfields are here: <https://www.ontario.ca/laws/regulation/040153>.

“Stormwater management will need to consider the Thames River and the floodplain, as well as the One River Environmental Assessment (if finalized at the time).” (p. 24).

Specific Comment 1: The subject property is within floodplain lands considered for the “Back to the River” conceptual plan: https://backtotheriver.ca/sites/default/files/DIL1501_Back-to-the-River_Final-Book_DIGITAL%20%281%29.pdf and is also part of the Thames Valley Corridor. “The majority of the study area falls within the significant valleyland corridor” (p. 20). A 100 m buffer is suggested on p. 7, citing the Thames Valley Corridor Plan from 2011.

Recommendation 2: Even if the One River Environmental Assessment has not been finalized at the time of writing, concepts in the One River Environmental Assessment and the Back to the River plan must be accommodated.

“Specific to the subject property, and just beyond, included Redbud and Canada Yew (Taxus canadensis), both species believed to be associated with landscaping of the subject property and the adjacent Eldon House.” (p. 13).

“Canada Redbud, which is considered Extirpated from Ontario (SX), was noted growing within the Cultural Woodland Inclusion. This species has escaped from the gardens at Eldon House, so this observation is also not considered significant. ” (p. 14).

Specific Comment 2: These statements offer varying degrees of certainty. Is the presence of Redbud and Canada Yew naturalized from nearby landscaping the opinion of NRSI? Cite source if not.

Recommendation 3: “The Tree Inventory Data” table in Map 3 doesn’t indicate which species are invasive. Indicate which species are invasive/non-invasive, perhaps as an asterisk in the native/ non-native column.

Recommendation 4: More discussion should take place regarding management of invasive vascular plants. There should be a clear differentiation between non-native species which are not considered invasive (such as London Plane-Tree (*Platanus X acerifolia*)) and those that are (such as Norway Maple (*Acer platanoides*)).

Three onsite surveys were completed (Sept., Oct. and Nov.). The timing was acknowledged as possibly accounting for a very low species diversity (total of 4 bird species observed within the subject property) of birds, no sightings of herpetofauna (p.16) nor Lepidoptera or Odonata species (p.18).

Eastern Wood-pewee (SCC): In 2013 UTRCA indicated that habitat for Eastern Wood-pewee should be protected regardless of whether the species was observed or not. Habitat for Eastern Wood-pewee was identified in Harris Park as candidate SWH (Eastern Wood-pewee), which extends onto the subject property as part of the northern cultural woodland (p.21).

Specific Comment 3: The same holds true for the common nighthawk which is considered special concern provincially and the flat top roof on the heritage buildings.

Recommendation 5: Disturbance to wildlife should consider bird impacts from the completed building. Building design should use the City of London’s Bird Friendly Skies guidelines:
<http://www.london.ca/business/Planning-Development/Pages/Bird-Friendly-Skies.aspx>.

“It is expected that once detailed designs, grading plans, and servicing information is known, that an addendum will be required to this EIS in order to update the impact analysis and identify further mitigation measures.” (p. 1).

Recommendation 6: EEPAC should be invited to give feedback at this point and to review the monitoring plan.

Regarding the site concept (Map 5 – Development Plan):

Recommendation 7: All glass on the exterior of the building up to the 4th floor should either: a) comply with the Canadian Standards Association (CSA) 2019 Bird Friendly Building Design Standard using materials that will reduce the risk of bird-window collisions, or b) meet requirements to be laid out in London's Bird-Friendly Design Guidelines (to be finalized by Development Services in Q1 2021). Priority areas should be facades that face surrounding vegetation. In general, adding lines or dots or some form of pattern on the exterior surface of the glass should suffice.

Recommendation 8: Light pollution could be minimized, particularly on upper floors, by installing light timers and ensuring outdoor light fixtures are cut off (downward-directed).