

March 26, 2021

Mike Corby
Senior Planner
Development Services, City of London
300 Dufferin St.
London ON N6A 4L9

RE: Updated Proposal for Development at 101 Meadowlily Road, File 39CD-20502 & OZ-9192

Dear Mr. Corby,

Thank you for the opportunity to comment on the updated development proposal for 101 Meadowlily Road South. Thames Talbot Land Trust owns a 5.9 ha portion of the Meadowlily Woods Environmentally Significant Area (ESA), immediately adjacent to the proposed development. We understand that updates to the site plan have been made and we have reviewed the provided information, updated Environmental Impact Assessment and the final stormwater management plan. Several of our earlier concerns are not addressed by the proposed changes so we would like to submit those concerns for your consideration. We have previously provided written comments on June 12, 2020 and January 12, 2021. Our concerns focus on potential impacts to the ESA, and most especially on the TTLT nature reserve, directly adjacent to the proposed development. TTLT's Meadowlily Nature Preserve is a certified Ecological Gift through the federal government and TTLT has a strong obligation to ensure that the natural features that are part of this Ecological Gift remain in excellent condition. Any changes in surrounding land uses that might have negative environmental impacts on TTLT's nature reserve are of great concern to us.

We have reviewed the Environmental Impact Study (December 2019, updated June 20, 2020) that was prepared by Natural Resource Solutions Inc and posted on the City of London website.

Buffers are an important consideration for development adjacent to an ESA. In this case, we note that the effect of the proposed buffer will be enhanced by the additional 11m setback from the ESA boundary. We support the use of fencing without gates at the rear of the building lots to prevent trespassing and damage to sensitive environmental features. Will the ESA Boundary be fenced to ensure foot traffic is not increased post development?

Following are some comments in response to issues identified in EIS Table 7 Impact Assessment and Net Effects.

Land Use Impacts LU4, LU5 – Drainage is a key issue for this development. The un-named creek is already subject to surges in heavy rainfall events. There must be no increase in post-construction flows as a result of this development. TTLT has experienced serious erosion issues at the Meadowlily Nature Preserve in the last 5 years. Heavy water flows were diverted onto TTLT's property from the road, causing erosion along the trail and the creek.

The issue was finally resolved in 2019. Given the elevation differences and the history of water control issues we are concerned about further drainage problems. We hope the final Stormwater Management Plan design meets the expected criteria of ensuring that water quality and quantity are the same post development as in the existing conditions.

Construction Impacts CO1 – Appropriate erosion and sediment control measures are very important. We agree with the consultant that an Erosion and Sediment Control (ESC) plan must be prepared. Even more important than a good plan, is the diligent monitoring of site conditions throughout the construction period. In many cases, erosion control measures are neglected, then fail, causing sedimentation. As the owner of a portion of the ESA located “downstream” of the proposed development, Thames Talbot Land Trust is very concerned about the potential impacts of sedimentation. Will a contingency plan be prepared to address unexpected failure of erosion and sediment control measures?

Construction Impacts CO4 – There must be no damage to retained trees. We support the use of tree protection fencing prior to any grading on site.

Stormwater Management Development Impacts – SWM1 through 7. As noted above, TTLT is very concerned about drainage issues.

Land Use Management Impacts LM2, LM6 – We are not convinced that risk associated with Yard Waste Disposal is Low. Fencing the back of the residential lots is a good starting point, but there is still risk associated with the pathway between houses, connecting the residential street to the multi-use pathway. TTLT members are familiar with similar situations, where determined homeowners have deposited wheelbarrow loads of yard materials in an ESA at the end of a pathway. These typically include invasive plant species (e.g. periwinkle, English Ivy), which then become established in natural areas that are designated to protect native plants and wildlife. Will fencing be provided along the ESA boundary? Signage indicating the ESA, TTLT property and “No dumping” should also be considered. TTLT appreciates that monitoring has been recommended in the plan for 2 years post construction, but *who* will monitor the ESA edge to ensure dumping and encroachment is not occurring? Is 2 years a sufficient length of time?

Land Use Management Impacts LM 3 – We support the use of native species for all plantings associated with this development.

Land Use Management Impacts LM 4 – Domestic Pets. We were not convinced that the risk associated with domestic pets would be Low and are happy to see this increased to Moderate in the updated EIS. In addition to the limitation in ESAs, municipal by-laws also require dogs to be kept on leash throughout the city. Despite these requirements, many residents allow their dogs to run off-leash in the ESA. Outdoor cats will have serious impacts on wildlife. Brochures are helpful, but much stronger action will be required in order to reduce this impact. In section LM 6 there is reference to fences helping keep cats from leaving yards, is this a type of fencing that is known to be “cat escape proof”?

Land Use Management Impacts LM 7 – Windows and birds. We are happy to see this impact included in the new EIS as we believe it is quite serious. Brochures about bird window strikes are helpful, but residents are unlikely to follow these suggestions, especially if they are bearing the costs of the necessary window treatments. Installing windows with built-in protection (at least for windows facing the natural area) would be much more effective in reducing this impact, and likely more cost effective overall.

We appreciate the City of London taking the time to consider the potential environmental impacts of the proposed increased population density, water management and road traffic in this environmentally sensitive area. The City of London is very proud of its Environmentally Significant Areas and recognizes them as “an integral part of London's Natural Heritage System”. We recognize the City of London’s commitment and leadership in protecting its ESAs. We look forward to reviewing further documentation for this proposal.

Sincerely,

A handwritten signature in blue ink that reads "Daria Koscinski". The signature is written in a cursive, flowing style.

Daria Koscinski
Acting Executive Director
Thames Talbot Land Trust