

### Excerpt from "Meadowlily ESA - Summary for the AWAC Agenda"

Re: Meadowlily Project, with particular interest in 168 Meadowlily Road (corner of Meadowlily Road South and Commissioners Road East)

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*As from April 4, 2013 AWAC agenda, with modifications for clarification enclosed in [ ]:*

On further review of the [Dillon Consulting Limited Environmental Impact Study, "Commissioners Centres Ltd. Meadowlily Road South & Commissioners Road Environmental Impact Study FINAL REPORT July 18, 2008"] by E. Gerrow on behalf of the AWAC Wildlife Subcommittee, we support EEPAC's concerns [expressed in 2008].

The EIS is extremely lacking given the sensitive nature of the area. While they did an EIS for the particular parcel, they failed to apply its connection to the overall ESA. While it is comprised of fields and not naturalized, the area may serve as a place of habitat and foraging for the species that live within the ESA and travel outwards to the outlying areas. As it is, the parcel has important hydrological implications: there is a ravine system located in the northwest corner of the site, which channels runoff towards the Thames River. This area is rife with ravines and water flows, meaning that any polluted runoff from parking lots and litter can negatively impact the water system. **The quality of the water has a direct impact on the wildlife and plants in the area – all of it is connected, which the EIS fails to address.** In the EIS, they say that the ravine of the parcel receives overland runoff from about 70% of the development site – a very, very large volume of runoff that would be affected by commercial activity.

Other problems with the EIS include the fact that the Bird Inventory was done once, and in mid-May, which is too early in the season to see a lot of activity. There should have been multiple observations over the whole season. There is also a flaw in how they looked for butterflies, after being informed that there may be regionally rare butterflies in the area. Instead of going out later in the season and looking for the butterflies, they "checked for the presence of specific plants... that provide food and resources for some rare butterflies". When "no such food resources were found", they concluded that the area is not significant. [This is not only vague – seeing as stating "some rare butterflies" is neither specific nor scientific – but it is flawed science. While the plants may serve as basic indicators *suggesting* the presence of certain species, their absence does not conclusively mean the butterfly species are not present at all, especially when they did not take into account the entire ESA. The only way to be absolutely certain would have been to monitor the area and visit on several occasions throughout the season to observe, but even then incidences of those species can be missed.]

The EIS makes a lot of assumptions, cuts a lot of corners, and uses old information from 20 years before (indications of species was published in 1988, instead of using information from within 5 to 10 years of 2008). There was also no mention of the Upper Thames River Conservation Authority (UTRCA), except for a walk-through, and their resource list was sparse. They also failed to show how the development would result in absolutely no negative impact (which they were supposed to achieve). Overall, it shows a lack of understanding of (very basic) ecological principles.

#### **Other Responses**

Other notable responses include those involved with Friends of Meadowlily Woods, TREA, the Urban League of London, the McIlwraith Field Naturalists of London, Irene Mathysen, and biologists including Greg Thorn from Western University. It was pointed out by a couple of these parties that the CCL EIS

noted adverse effects to drainage by the sports park. If a sports field could have those impacts on the ESA (when the original EIS for that project said there would be *no negative impact*), it is not hard to imagine what a commercial area would do to the ESA.

Other details pertinent to AWAC:

- Meadowlily is a breeding area and stop-over point for migratory birds
- There are studies of spiny soft-shelled turtles being pursued in that area, a sensitive species found in London that needs to be protected
- The Meadowlily area is habitat for about 33 Species-at-Risk, considered by the Ontario Ministry of Natural Resources as a habitat for Endangered and Threatened Species
- The EIS submitted assumes that edge species have little value and that what happens to them and the edge environment will have little impact within the interior of the ESA. However, this ignores ecological principles. The ESA is already relatively small and at risk; in pushing back or removing the buffering edge, the interior of the ESA shrinks, diminishing the quality and diversity of the ESA as a whole, meaning a negative impact on wildlife and all plants and organisms that help sustain that wildlife.
- In April 2002, there was an EIS released for the Meadowlily Subdivision which identified species of amphibians, breeding birds, and mammals. Of these, there were area-sensitive bird species identified (hairy woodpecker, white-breasted nuthatch) and species of local conservation priority (wood thrush and scarlet tanager). It was also determined that the area supports fish like bass, northern pike, rainbow trout and that the river near Meadowlily is used for spawning and rearing of warm-water species.

More detailed responses are publicly available from the agendas, minutes, and other documents obtained by the AWAC Wildlife Subcommittee. These include the Visioning Sessions held in February 2010, the Master Plan, the Terms of Reference for the project, and Alternative Land Use Options.

#### **Natural Heritage Studies Results (Specific Focus on Wildlife)**

At the resolution of City Council in October 2008, AECOM drafted a Natural Heritage Study (NHS) entitled, "DRAFT Meadowlily Area Plan: Natural Heritage Study" on January 25, 2011 (55 pages).

While not perfect, the NHS contained better information than the Dillon EIS. There was an agreeable amount of coverage of ESA aspects such as wildlife and the study included 168 Meadowlily as part of the overall ESA. In reviewing the table of field investigations, their dates of study are an improvement on the original EIS, with more time spent across the board and more appropriate dates for avifauna. Unlike the Dillon EIS, they also provided information from the UTRCA, the Department of Fisheries and Oceans (DFO) and Environment Canada, such as 34 fish species and 9 freshwater mussels found in the South Thames River – four of which are listed as Species-at-Risk. While the AECOM study identified only 3 species from the list of 34 (and an additional species), it does not mean that other aquatic species do not use the area for habitat.

They also gave more focus to the ravines and quality of water running through the area towards the river, providing insight on the current problems that need to be kept in mind for future protection of the ESA. This is of particular concern given that water quality can determine the quality of the ESA and diversity of species within the ecosystem. For instance, the AECOM report reports observation of caddisflies and stoneflies, species that generally indicate clean water. In the case of the stonefly, they cannot tolerate

water pollution. While small insects, their role in the ecosystem can be easily underestimated, being part of the larger picture of diversity and resources for larger wildlife.

### ***Breeding Birds***

AECOM recorded a total of **74 separate species** of birds during their breeding birds investigation (in an area that is 135 hectares large and is surrounded by urban development), including:

- Chimney swifts, a nationally and provincially-ranked Threatened Species
- 16 species identified as priorities for conservation in the Partners in Flight Ontario Landbird Conservation Plan
- 37 species listed as Conservation Priority Birds for Middlesex County
- 14 species listed as Area Sensitive by the OMNR

Specific species are listed in the report. Furthermore, as pointed out by AECOM, "while no other Species-at-Risk birds were observed, this does not preclude their presence."

### ***Mammals, Reptiles, and Insects***

Incidental observations of other wildlife were recorded on each field visit, including:

- White-tailed deer, red foxes, eastern cottontail, raccoons, squirrels, chipmunks, groundhogs, muskrat, mice, and evidence of beavers
- Northern brown snakes and garter snakes
- 24 butterfly species (including Monarchs)
- 10 dragonfly species
- 4 damselfly species
- Various other insects

### ***Overall Point to Take from AECOM Report***

While the report could be improved upon, there is a substantial amount of information included in this report that should give those involved pause. There is a great diversity found in the plant and animal species in this relatively small area. **It is a fully-developed ecosystem and as such, it should be left alone and protected in its entirety.**