

3095 Bostwick Rd, Part Lot 76, London, ON  
 Review of EIS prepared by MTE for Southside Group  
 Reviewers: L. Banks, S. Levin, R. Trudeau, I. Whiteside

**A. Piecemeal Approach**

The entire property in question is referred to as the Legal Parcel (dotted line). An EIS Scoping Meeting was held on April 6, 2020 with respect to the Legal Parcel. The proponent has proposed the severance of 11.8 ha (solid line) from the Legal Parcel and refers to it in the report as the Subject Lands.

Piecemealing is a land use development approach that EEPAC does not support. Severance of the centre of the Legal Parcel must not preclude the review of impacts on the adjacent land. For example, the report did not identify any significant areas of concern from a hydrogeological perspective. The boundary of the Subject Lands may be >90 m from wetland features (b & c) that comprise units of North Talbot Wetland PSW, but the report does not suggest where the water comes from that feeds the PSW.



## **B. The Small Wetland Feature**

The report states that the Subject Land development will avoid the natural heritage features identified for consideration in the Scoping Meeting for the Legal Parcel. The Submerged Shallow Aquatic Ecosite (SAS1), identified as inclusion 'd' on the above map, cannot be ignored.

Quoting from the Southdale Road West Improvements - Pine Valley to Colonial Talbot Road - EIS, August 2018:

“Vegetation will be removed to accommodate the widening of Southdale and Bostwick Road. This includes the removal of 0.03 ha of wetland habitat along Southdale Road. Details will be determined during detailed design phase.

This work will be completed in three phases:

Phase 1- Bostwick to Pine Valley 2022.

Phase 2 - Colonial Talbot Intersection 2024.

Phase 3 - Colonial Talbot Road to Bostwick 2031.

The wetland will be impacted in 2031 but not removed. Southside Group, The City and the owner of 735 Southdale Road must coordinate the fate of this small wetland feature. It is a good candidate for relocation. Selecting a location near the dug pond (inclusion 'a') might ensure a connection to the PSW, a minimally stressful wildlife transfer and a connection to the potential significant woodland (label 1 in the above map). However, it is premature to determine a location until additional field work is completed on the feature and on the Legal Parcel.

## **C. Incomplete Report - This EIS should not be accepted by Development Services**

MTE surveyed the Legal Parcel in 2018. Where is the summary of Field work and Field dates?

Amphibian Call Surveys, Breeding Bird Surveys, Species At Risk Assessment are missing from this EIS and could help to assess impacts and guide mitigation.

AECOM biologists, working on the Southdale Road widening EIS, set up species specific survey stations along the north perimeter of the Subject Land in June/July 2018. Both Bobolink (THR) and Eastern Meadowlark (THR) were identified during the surveys as well as other SAR species.

The Subject Lands were converted to row crop production in 2019 which provides an exemption to the ESA (2007). However, Eastern Meadowlark breed primarily in pastures and hayfields but are also found in weedy borders of croplands, roadsides, alfalfa fields and other open areas. The adjacent lands need to be considered and therefore wildlife surveys, impact assessment and mitigation measures must be included in this EIS. EEPAC reiterates that the City must begin to find lands to compensate for the loss of habitat for Eastern Meadowlark and Bobolink in the SW Area.

## **D. Presupposing Road Construction**

The Development Plan overlay illustrates access to the subdivision from the south end with connections between Frontier Ave and Pack Road and Regiment Road and Pack Road. At the north

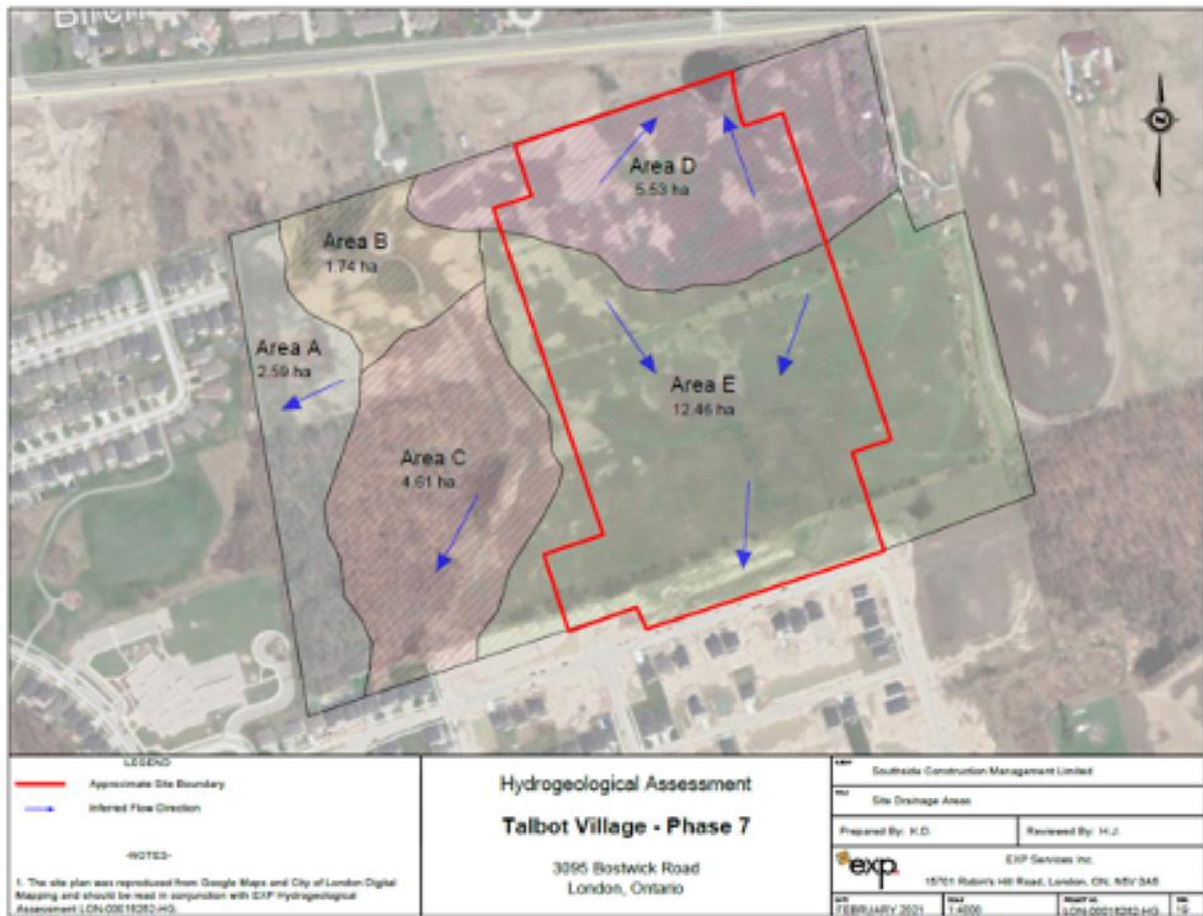


## **Water Balance Assessment**

The report identifies that both run-off and infiltration can be maintained at close to pre-development conditions if mitigation measures are put in place - these mitigation measures include rear yard swales, added topsoil thicknesses in landscaped areas, and, a bioretention facility within the Park block. However, none of these LID measures are currently included in the preliminary development plan for this Site. We recommend that these be added to the site design to demonstrate the feasibility of the proposed LID measures (i.e. confirmation that the proposed LID measures can actually be incorporated into the site design). Secondly, given that some of these LID measures will be placed on private property, the eventual home owners may lack expertise or wherewithal to properly maintain the LID measures. Thus, we recommend that the proposed LID system(s) necessary to achieve the minimum 80% target should be placed on public property, as the eventual homeowner may lack the desire or skill to maintain the LID measures and run-off may consequently increase over time as the efficacy of the LID measures wane.

## **A Contradiction in Surface Water Flow**

The topography of the Legal Parcel is relatively flat, slopping downwards gently towards the southeast. Flow patterns in Areas A, C, D and E on the map below contradict this statement. Site topography indicates that there is no flow from the Subject Lands to the PSW. However, flow direction in areas A and C might suggest otherwise. What about Area B, where small wetland features are located? Why are flow direction arrows missing?



**Recommendation 1** - Develop a wetland relocation plan for the Submerged Shallow Aquatic Ecosite on the Northeast corner of the Subject land. The City should take the lead on this now.

**Recommendation 2** - Provide a summary of Field work and Field dates and Scoping Meeting notes before accepting this EIS as complete.

**Recommendation 3** - Recommend a water balance assessment to ensure that the proposed development does not impact the wetland features on the Legal Parcel which appear to be part of the North Talbot PSW.

**Recommendation 4** - Recommend LID measures mentioned above be added to the site design to demonstrate the feasibility of the proposed LID measures (i.e. confirmation that the proposed LID measures can actually be incorporated into the site design).

**Recommendation 5** - The LID systems should be placed on public land.

**Recommendation 6** - Place a holding provision on zoning until a Stormwater Management Plan has been developed.