

## Review of Subject Land Status Report for Kilally South, East Basin Stormwater Servicing, dated November 14, 2019.

Received by EEPAC at the November 2019 meeting

Reviewed by C. Dyck, B. Krichker, P. Ferguson, and I. Whiteside

### Overall Comments

The SLSR was found by to be limited in scope and consequently, EEPAC's recommendations are largely framed around conducting impact assessments for key features in the ensuing EIS. The SLSR also makes recommendations with respect to impact assessments – EEPAC agrees with all of these recommendations. In addition to the recommendations including in Section 5.1 of the report, EEPAC recommends that:

1. When evaluating these impacts, consideration should be given to the cumulative impact from this development, existing developments (e.g. the subdivision to the south), and future developments (e.g. the planned expansion of the bridge over the Thames river at Clark Rd, the expansion of Veterans Memorial Parkway, and future onsite developments). The impact assessment should use a system approach and holistically evaluate cumulative impacts.
2. A water balance assessment be conducted on a pre-and post- development basis to identify potential development impacts to ecological receptors both onsite and offsite.
3. Existing baseline conditions should be established for water quality and quantity flows. This evaluation should incorporate finding from relevant UTRCA and/or City of London sub watershed studies (note the relevant Upper Thames River Watershed is called "The Forks") where appropriate. From an impact perspective, the report should address port development stormwater quality and quantity controls necessary to maintain or improve the existing ecological function of the site.

### Additional Recommendation

4. This report and others indicate that Queensnake was found in the area. Given its status as "Endangered" under SARA and ESA, and that surveys/ site assessments in their habitat can potentially injure or kill a Queensnake (as documented in the correspondence section of the report), EEPAC recommends that a precautionary approach be used: any survey in an area of Queensnake habitat should assume that the snakes are present, whether the snakes are found or not.