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Sent: Wednesday, February 9, 2022 11:33 AM

Subject: Greenway EA - EIS

Hi Marcy, here are the preliminary comments from the Greenway PCP EA working group. Look forward to your feedback at EEPAC next week.

Regards

1 – The EIS identified one Kentucky coffee-tree on the site. The EIS goes from “appeared to be a planted species” to being “a planted species”, meaning it does not receive protection under the ESA... I suppose it’s one of those things that is impossible to prove. However, the report does recommend that the tree be transplanted, and we would agree with that recommendation (section 9.6).

2 – With respect to the Bat Maternity Roosting Survey, the report found a total of 30 snags (of which 20 were high quality) and went onto say that 55 snags would be the minimum based on the forested size (5.51 ha) to be considered SWH for bat maternity roosting habitat. However, the report also mentioned that “large portion of the FOD7-4 ecosite within the WWTP compound was inaccessible due to lack of access within the fenced area of the Greenway WWTP. Snag trees and mature Oak and Maples were identified from a distance, indicating that additional habitat potential is present within this feature beyond that survey findings indicate.” (Section 5.4.3.1) It might be worthwhile to more formally determine whether there are more snags in this area such that the forested area is indeed SWH for bat maternity roosting habitat. Are there alternative ways to better search the area for suitable habitat, for example using drones or something similar?

3 – Several areas were identified as having Buckthorn. As part of the construction of the flood mitigation measures, the EIS states that some vegetation will be removed to erect the proposed berm. While this vegetation is being removed, would it be feasible to also go in and remove any Buckthorn at the same time?