



MTE Consultants

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September 27 2022
MTE File No.: C45606-100

Nancy Pasato,
Senior Planner, Planning and Development
300 Dufferin Ave, 6th Floor
London ON N6A 4L9

Dear Nancy:

Re: OZ-9431 - 952 Southdale Road West - EEPAC comments August 2021

Through the settlement discussions and revisions to the originally submitted draft plan submission, City staff have requested a response to the EEPAC comments dated August 2021. These EEPAC comments refer to the EIS of the original draft plan of subdivision and while the general comments may still apply, details may no longer be pertinent to the recently agreed upon revision. As a result, this response letter has attempted to consolidate the original comments into main themes rather than a comment by comment review more typical of later stages of the development approval process. These generalized comments are compartmentalized into the following topics:

- 1) Buffers
- 2) Hydrology and Stormwater Management
- 3) Monitoring
- 4) Other

Buffers

There is ongoing debate and discussions on the utility, effectiveness and benefit-cost of setting generalized buffer distances for development limits. Much of the buffer science utilized to establish buffer distances have been derived from water quality benefit studies and less so on their effectiveness post-development as a means of people management and encroachment (see Beacon, 2012 review of Buffers). Given some of the water quality benefits of buffers, we agree that considerable effort is needed in guiding the construction phase of development with respect to site grading, erosion potential and sediment control. The EIS focussed the recommendations effort towards addressing the site works management necessary for this development, given the distance to the PSW. The EIS relied on detailed hydrogeological investigations and stormwater management design by others to ensure the water quality requirements of the wetland have been met in the post-development setting.

At the time of the original application, access from Southdale was an issue with respect to its location relative to the wetland. However, it was our understanding at the time of the original submission, that the road access was as close to the Colonel Talbot and Southdale Road

intersection as would be permissible from a traffic safety perspective. Through further discussions with the City of London staff since the original submission, the access location has been refined and, as a result, the entrance has been shifted further west, away from the wetland.

The current plan indicates a minimum 20m wetland buffer in that location.

There have also been further adjustments to the site layout and parking allotment which has resulted in a greater buffer setback, all along the development limits. This distance is not the 30m suggested by EEPAC but there is greater area to allow for naturalization, invasive Phragmites management and expansion of potential significant wildlife habitat including terrestrial crayfish burrows into agricultural lands when compared to the pre-development setting. Further, within the feature to be protected, there is invasive Phragmites and Buckthorn which should be managed for higher quality habitat. A large generalized buffers next to poor quality habitat is not necessary. We are satisfied with these expanded buffers but will retain the recommendations for staged fill placement in the updated EIS.

Hydrology and Stormwater Management

As landowners are required to collect more detailed and costly pre-development information such as surface runoff, infiltration rates into the surface till, and movement downward and horizontally toward wetland features, the understanding of water balance and management has become more sophisticated. Because runoff on a developed parcel behaves differently than the pre-development condition, more sophisticated measures are being developed to mimic water balance needs. Stormwater management has evolved considerably from simply managing water quantity and then quality to now attempting to mimic seasonal variability. The Toronto Region Conservation Authority has expanded considerable research into devising and researching new technologies. It is with this increased knowledge, supplemented with detailed site-specific information, that buffer distances can be more reasonably established. We no longer require the occupation of so much land in generalized buffer widths which were originally set to recognize the lack of data and sophistication of design at the time.

As part of the ongoing studies and discussions that have taken place since the draft plan submission, in preparation for detailed design and also to address agency comments, an updated hydrogeology report has been completed since the date of the EEPAC review. The update included additional monitoring locations and additional real-time data over several years. While the conclusions and recommendations have not changed to guide the draft plan, the extra detailed data will be useful in finalizing the engineering design that follows draft plan approval.

Also, since the original application, further investigation has determined that there is a stormwater outlet available at Southdale Road, a short distance east of the Subject Lands. This outlet consists of a culvert that conveys flow in a buried pipe through the development to the south, towards the North Talbot Stormwater Management System. Conveyance from the Subject Lands to this culvert is through the roadside ditch.

Monitoring

Details of the monitoring plan for the construction and post construction phase have not yet been refined beyond general guiding principles. The EEPAC suggestions can be considered at the detailed design stage, to formalize the monitoring program.

Other

There are a number of recommendations and suggestions from EEPAC that can be considered in an updated EIS Addendum with the revised draft plan. Many are editorial in nature. However, it is useful at this time to acknowledge Comment 6, regarding the use of older Official Plan schedules in the submitted EIS. The older schedules simply reflect the MNRF wetland boundary feature more accurately. London Plan maps were created prior to the MNRF boundary delineation exercise conducted for this application. Without an amendment to the London Plan Maps yet available, the older schedule was used.

Should you have any further questions or comments, do not hesitate to contact the undersigned

Yours truly,

MTE Consultants Inc.

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