

92 and 96 Tallwood Circle

EIS received at ECAC at its November meeting, these comments submitted to staff November 30, 2022

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SUMMARY

The key issues to be addressed are invasive species removal and implementation of the Environmental Management Plan

A. Invasive species management and Tree Removal

The EIS identified a number of invasive species that spread. It is possible they have invaded the adjacent valley lands. It appears from Photo 5 that this may indeed be the case.

Although leaving the branches and stumps in the valley can serve a purpose, the concern is that it will make it difficult to remove any invasive species that have “escaped” into the valley. As because at this time of year, leaves and sometimes snow cover the slope, it is unknown if vinca and/or lily of the valley have spread. Therefore any of the trees left to rot below the top of bank should only be placed in locations previously identified to be free of invasive species.

B. Restoration Plan (page 20)

All new trees must be native trees.

C. Appendix I – Environmental Management Plan

It is not clear who will be responsible for implementing the plan including invasive species removal. Will the proponent be given access to what will be two private lots? Or will the responsibility fall on each land owner? The approved monitoring plan needs to state who will be responsible for the long-term, post construction monitoring program and to set out specific time frames, over the two-year period, for the submission of reports to the City and the UTRCA.

What mechanism does the City have for ensuring implementation – is there Site Plan Control?

1.6 – in addition to the consultant inspecting the ESC measures before construction starts, an inspector from the city’s building division should do an inspection during construction as set out in recommendation 2.13.

2.6 – soil stockpiling - Any soil stockpiling that is within 5 m of the top of slop must be covered with tarp if heavy rains are forecasted. The consultant should be requested to inspect the erosion and sediment control fencing after heavy rain events (not just before as noted in 2.13). If not, city building inspectors should.

3.3 – “Householder Education” needs to be site specific. The package needs to include stronger wording that clearly states that the areas beyond the concrete monuments are the property of the City of London and that such lands shall remain in their existing natural condition. This means that the homeowner shall refrain from mowing, dumping and any activity that could damage this natural environment.

3.8 – concrete monuments and no mowing zone. The monuments by themselves, supported by “householder education,” will be insufficient in the longer term to reduce the possibility of removal/damage to the naturalized area. ECAC recommends that on each lot, between the concrete monuments, signage be posted. The signs should include information on why no mowing or dumping of yard waste should occur, why no fertilizers are to be used and why native species have been planted. This will increase the likelihood that the plan will endure longer than the two year monitoring period.

D. Map 5

p.22 of the EIS concludes that the adjacent valley lands meet the London Plan definition of Valleylands and should be included on Map 5. As there is no change to zoning or OP, how and when will this change happen?

E. Butternut tree

The distance between the site and the tree is unclear as there are three different distances given in the EIS. The fencing in place as of Nov 28 should suffice to protect the tree.