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RE: Peer Review Response

This peer review response is based on information emailed to us on May 13, 2025 by Kelsey Jones (Senior Planner, Fotten), that extended from a memorandum by Jeff King (Senior Biologist, Egis) on November 1, 2024 to Lindsay Lambert (Senior Planner, Township of Leeds and Thousand Islands). The request was to provide a formal response to two of the issues related to Blanding's Turtles and Chorus Frogs.

Blanding's Turtle:

Impacts to Blanding's Turtles focus on four key life cycle features. These include the following:

1. Feeding: All feeding occurs in aquatic habitats and there is no aquatic habitat within the proposed Pecks Marina storage site. As it currently stands, it is a heavily altered site covered with crushed rock. The closest areas with potential feeding potential are:
 - a) ~ 100 meters SW, on the far side of Fitzsimmons Road.
 - b) ~ 140 m west on the far side of Fitzsimmons Road.
 - c) ~ 400 m to the east.



It is important to note that these areas are only potential Blanding's Turtle feeding areas, and we have not observed Blanding's Turtles here. Even if present, Blanding's Turtle feeding would not be impacted from the proposed storage operation.

2. Overwintering: Overwintering requires water that is deep enough not to freeze to the bottom in winter. While turtles have adaptations to survive the low oxygen conditions of overwintering, sites with water currents are preferred as they provide greater oxygenation potential. Sites that remain unfrozen longer are also preferred for similar reasons. The three possible feeding areas discussed above may be suitable for overwintering, and none of these sites is under any risk from the proposed storage operation.

3. Basking: Due to seasonal limitations, turtles in our region require basking to help speed up metabolism, in order to complete their life cycle functions. Basking typically occurs in and around feeding and overwintering area. Combined, all three (basking, feeding, overwintering) are considered core habitat. The large separation distances, and the density of the intervening vegetation means that if turtles were basking in the three potential feeding areas, they would not be disturbed by the operations at the proposed storage site.

4. Nesting: Blanding's Turtles will travel overland from core areas in search of suitable nesting areas. Suitable nesting areas require appropriate diggable substrates and good sunlight exposure. These often occur in roadside verges in close proximity to core habitat areas. This could mean that Fitzsimmons Road next to proposed storage area is a possible nesting area, but we found no evidence of nesting on the road next to the proposed storage area by any turtle species. Turtles will also seek garden areas and residential lawns for nesting purposes, neither of which the storage area will be maintaining. We note that Snapping Turtles have attempted nesting in lawn areas about 400 m to the north.

The wetland area to the immediate south of the storage area would not be used for feeding, basking, or overwintering. It might be used as a travel corridor between various wetlands and for nesting travel, but it is well separated from the storage area by a rock rubble wall that turtles would not be able to scale, and the storage operations would not hinder any potential corridor movement through this wetland to the south.



The Category 1, 2, 3 habitat zones are intended for consideration when alteration of a site with suitable habitat is proposed. However, in this situation where the site is already heavily altered and has no habitat suitability, then the category zones should not apply to this property.

The ESA is intended to protect habitat and direct harm to Blanding's Turtles themselves. We would recommend consultation with the MECP if there was a reasonable risk to Blanding's Turtles. However, in our opinion, the proposed storage operation will not pose any direct threat to Blanding's Turtles or their habitat and that consultation with the MECP is unnecessary, and adds further delay to the proponent's plans, which to date have been considerable.

Chorus Frogs: Field work determined that frogs were calling from a wetland area about 140 m NW of the operational area. Frog species calling from this area included chorus frogs, spring peepers, and American Toads. From a planning perspective this observation has no Official Plan (OP) significance for three reasons.

1. The associated pond is more than 120 m away, which is the OP adjacent land distance for significant wildlife habitat (SWH) consideration.
2. The call codes recorded were below required SWH thresholds, and therefore SWH status is not reached.
3. None of these species have any status as rare species for SWH or ESA purposes.

Given that there is no frog SWH breeding habitat on the storage lands or within the 120 m adjacent lands, we refer to the following excerpt from Section 4.4 of the Natural Heritage Reference Manual (MNR 2010).

The need to evaluate the ecological function of adjacent lands (i.e., undertake an EIS or equivalent study) would be removed if proponents choose to avoid having development and site alteration occur within the extent of adjacent lands.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Rob Snetsinger".

Rob Snetsinger
Ecological Services