

March 10, 2024

File: 103027.001

SINA
3030 Boul. Le Carrefour, Suite 1200
Laval, Quebec
H7T 2P5

Attention: Mohamed El-Koury, ing. - Partner

**Re: Species at Risk (Blanding's Turtle) Permitting Requirements
788 March Road, Ottawa**

Please accept this letter as the GEMTEC Consulting Engineers and Scientists Limited (GEMTEC) opinion regarding the permitting requirements associated with the development of 788 March Road, Ottawa, herein referred to as the subject site.

BACKGROUND

GEMTEC Consulting Engineers and Scientists Limited (GEMTEC) was retained by SINA to complete an Environmental Impact Statement (EIS) for a proposed residential development application for the subject site.

In support of this EIS, a desktop review and single field investigation were completed in summer 2023 to identify the presence or absence of natural heritage features and species at risk (SAR) on-site. The focus of the site investigation was to describe, in general, the natural and physical setting of the subject property with a focus on confirming the presence or absence of natural heritage features and potential SAR or their habitat as identified in the desktop review.

Following completion of the desktop review and site investigation the following natural heritage features were identified on-site or within the study area: fish habitat, *candidate* and special concern and rare wildlife habitat (eastern wood-pewee, wood thrush and snapping turtle). The following SAR and their habitat were identified as having a potential to occur on-site: eastern small-foot myotis, little brown myotis, tri-colored bat, Blanding's turtle, black ash, and butternut. Regulated Category 2 and 3 habitat was identified on-site for Blanding's turtle. No black ash or butternut trees were observed on-site during the field investigation.

BLANDING'S TURTLE HABITAT

While targeted basking turtle surveys were not completed in support of this EIS, the site is located within a greater area of known Blanding's turtle occurrences. During the site investigation Blanding's turtles were not detected on-site.

As outlined in the MNRF general habitat description for Blanding's turtle, Category 1 habitat is defined as "the nest and the area within 30 m of the nest or overwintering sites and the area within 30 m of the site", Category 2 habitat is defined as "the wetland complex (i.e. all suitable wetlands or waterbodies within 500 m of each other) that extends up to 2 km from an occurrence and the area within 30 m around those suitable wetlands or waterbodies" and Category 3 habitat is defined as "the area between 30 m and 250 m around suitable wetlands and waterbodies identified as Category 2, within 2 km of an occurrence." The MNRF general habitat description for Blanding's turtle is provided in Appendix E.

While Shirley's Brook is unlikely to support Category 1 overwintering habitat, due to the hard pan soils and bedrock streambed, it is likely to provide suitable aquatic habitat for Category 2. As regulated Blanding's turtle habitat extends up to 2 km from on observation, based conservatively on the NHIC observation data, Shirley's Brook is assumed to provide at a minimum Category 2 and Category 3 habitat.

Blanding's turtle habitat impacted by the proposed development includes the loss of approximately 0.67 ha of Category 3 habitat on-site. The proposed stone path also has the potential to impact Category 2 habitat on-site; however, impacts are anticipated to be minimal. Furthermore, GEMTEC understands that the proposed development includes cantilevered balconies which begin on the second story, approximately 2.3 m above the ground surface and project 3.5 m into the identified Category 2 habitat.

PERMITTING REQUIREMENTS

Due to the presence of regulated habitat for Blanding's turtle on-site, an Information Gathering Form will be required to be submitted to the MECP to determine the project requirements under the *Endangered Species Act, 2007*.

It is GEMTEC's opinion that the present degraded state of the subject site between 30 m from Shirley's Brook and March Road (Category 3 habitat), coupled with the lack of suitable habitat west of the site for various life purposes, that the Category 3 habitat currently present is non-functional. Accordingly, it is unlikely that any offsetting or compensation work will be required.

With respect to Category 2 habitat located between the normal high-water mark of Shirley's Brook and a 30 m offset, it is GEMTEC's opinion that the proposed building which includes a cantilevered design which begins on the second story, approximately 2.3 m above the ground surface and project 3.5 m into the identified Category 2 habitat will not contravene Section 9 or Section 10 of the *Endangered Species Act*. This opinion is based principally on the fact the proposed development will not occur at ground surface and will leave adequate space for continued use of Category 2 habitat for life processes as described in the General Habitat Description. Additionally, the most likely migration route for Blanding's Turtle is in a linear manner along the Shirley's Brook

corridor and an cantilevered design located 26.5 m (horizontally) away from the normal highwater mark is unlikely to impact Blanding's Turtle migration along the Shirley's Brook corridor.

CLOSURE

We assume that the above information is sufficient for your current purpose. If additional information or clarification is required, please do not hesitate to contact the undersigned.

Sincerely,



Drew Paulusse, B.Sc.,
Senior Biologist

Enclosures
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