



Ecological Services
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February 19, 2025

Curtis Ottenhof, P.Eng.
Senior Project Manager
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RE: Wetland Impact Letter, Ivy Lea Complex, 61 Shipman's Lane

This letter is in response to a February 4, 2025 email from Lindsay Lambert (Senior Planner, Township of Leeds and the Thousand Islands) to Curtis Ottenhof (Kehoe Marine) regarding the construction of a shoreline structure at 61 Shipman's Lane. Specifically, Mr. Lambert's notes the following:

Instead of the EIS Report/Brief, the proponent can submit a dated and signed letter from a qualified individual (e.g. biologist) to speak to whether the proposed scope of work will have any environmental/ecological impact on the Ivy Lea PSW Complex.

We are familiar with the property, having done EIS work associated with the Shipman's Lane development in the past as it relates to docking expansions and new development. We have also done assessment work as it relates to the Ivy Lea Complex, both here at Shipman's Lane and in McRae's Bay.

The Ivy Lea wetland was first surveyed by Peter Mabee and Peter McIntyre in 1982 with the first edition of the wetland evaluation manual. A second evaluation was completed in 1991 with the second edition of the wetland evaluation manual (MNR 1984) by Jann Atkinson and Ron Huizer. As part of the evaluation, Atkinson and Huizer (1991) combined the Ivy Lea wetland mapped by Mabee and McIntyre in 1982 with the Knight's Creek wetland to make what we now know as the Ivy Lea Wetland Complex. This new evaluation changed the scoring of the wetland so that it went from a regionally significant wetland to a provincially significant wetland.

Wetlands in the province are now evaluated with the 4th edition of the wetland evaluation manual, which minimizes the potential for complexing. As such, if the Ivy Lea Complex were re-evaluated today, it is possible it would be un-complexed and no longer score as a PSW.

Impact assessments related to PSW's for PPS and Official Plan purposes consider a 120 m adjacent land distance. We took the MNR mapping of the Ivy Lea Complex from the NHIC mapping site (see Figure 1) and determined that the proposed work area is more than 120 m from the PSW.



Figure 1. NHIC mapping of the Ivy Lea Complex outlined in yellow.

Since there is no PSW within 120 m of the proposed work area, we refer to the following excerpt from Section 4.4 of the Natural Heritage Reference Manual.

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 proposed work and site alteration occur within the extent of adjacent lands.

Accordingly, no further analysis should be necessary regarding this PSW.

The wetland area shown in Figure 1 is an isolated wetland bay. The main body of the wetland is further west and starts about 270 m from the proposed work area, as the crow flies. Under the current 4th edition of the wetland manual, it is conceivable that the isolated wetland bay in Figure 1 would not be included as part of the PSW because of the changes in how wetland complexing is now undertaken, and how isolated wetland areas (such as the Figure 1 bay) are considered.

The area of wetland shown in Figure 1 was mapped as suW1 by Atkinson and Huizer (1991), in which they state that pondweeds were the dominant species followed by milfoil. A thorough investigation of the vegetation community in the bay was likely not undertaken in 1991. This is not a criticism of the work by Atkinson and Huizer as internal vegetation community mapping was not given a high priority within the 2nd edition manual instructions, and Atkinson and Huizer spent only 8 hours surveying the entire wetland that stretched over a distance of over 3 km from east to west and almost 2 km from south to north (encompassing an area > 350 ha), and contained 11 sub-wetlands, 24 different wetland community types, and 60 wetland vegetation communities. This suggests that Atkinson and Huizer would have had about 8 minutes to assess this bay for its wetland features. This does not even account for the travel time that would be needed to cover all the communities within the wetland. At best, it is our opinion that they would only have been able to do a quick spot check, which is an insufficient amount

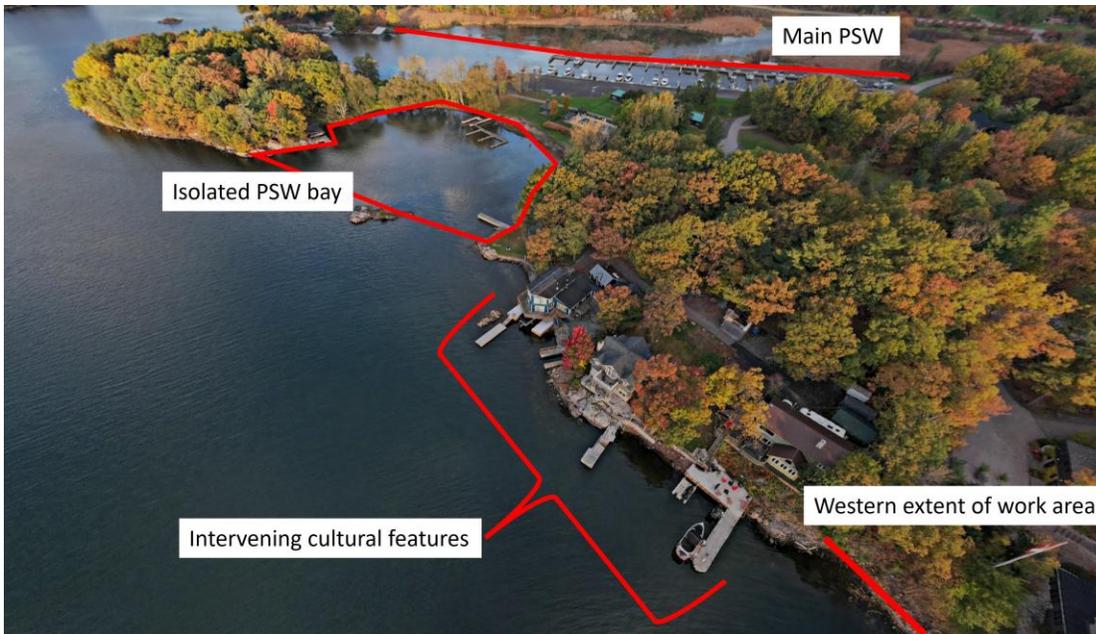
of time to accurately assess the vegetation community in the bay, including water depths and percent vegetation coverage.

Nevertheless, if we consider the wetland bay in Figure 1 to be dominated by pondweeds and milfoil of sufficient density to be considered wetland as mapped by Atkinson and Huizer, then it has a different aquatic ecology than the waters off shore where the proposed work is to take place (see Figure 2). It is comprised of a hardened shoreline, which extends into the river, and with a hardened bottom of limited submergent vegetation. The ecological aquatic differences between the work area and the wetland bay indicates a level of ecological separation, indicating a lower potential level of impact.



Figure 2. Picture showing where the work is to take place.

The cultural intervening shoreline features also indicate an ecological separation between the work area waters and the wetland bay, as indicated by Figure 3.



The final impact consideration for this project as it relates to the PSW is the level of in-water alteration. It is our understanding that this will be a stationary dock elevated above the water on pilings. This means there should only be a minimal impact on the lake bottom.

In summary, it is our opinion that no negative impact to the Ivy Lea Wetland Complex will result from the proposed dock work. We make this statement with the understanding that appropriate in-water construction mitigation methods will be employed and be approved by the Department of Fisheries and Oceans.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Rob Snetsinger". The signature is written in a cursive, flowing style.

Rob Snetsinger
Ecological Services