



OFAH FILE: 333A
June 6, 2024

Mayor Kenneth Craig and Council
Municipality of Kincardine
1475 Concession 5, RR#5
Kincardine, Ontario
N2Z 2X6

Subject: Development along the Little Sauble River

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 700 member clubs.

Aquatic and terrestrial habitat is critically important to the long-term health of our Province, not only from an ecological perspective, but socially and economically as well. Our woodlands, wetlands, and waterways are central to our identities as outdoor recreationists, conservationists, and Ontarians. The OFAH has reviewed the project EIS, Functional Servicing Report, and the Municipality of Kincardine's official development plan for the proposed development project at lot 6 to 10; E Victoria St. W Albert St, Municipality of Kincardine (Bruce Township), and would like to express our concern over the potential ramifications of such a project.

To begin, section 7.3 of the project EIS requires clarification. While 7.3 asserts that direct and indirect impacts to SWH and Bat Maternity Colonies "...are not anticipated as these habitats are exclusive to the FOD5-1 community", it is also made clear that Bat Maternity Colonies and other SWH do, in fact, exist elsewhere on the site:

"Candidate bat maternity roosts were identified in the FOD5-1 and FOD7-communities on the subject property. No SAR bats were detected in the FOD5-1 community. The SAR bat, little brown myotis, was detected in the FOD7-2 community."

- Bat Maternity Colonies associated with the FOD7-2 community;
- Reptile Hibernaculum associated with the FOD7-2 community;
- Woodland Area-Sensitive Bird Breeding Habitat associated with the CUP3-9, CUW1, FOC2-2 and FOD7-2 communities;
- Marsh Breeding Bird Habitat for Green Heron associated with the CUM1-1 community adjacent to the Little Sauble River; and
- Special Concern and Rare Wildlife Species associated with the CUM1-1, FOC2-2 and FOD7-2 communities."

These statements appear contradictory and require significant clarification.

Furthermore, it is not apparent to the OFAH that the mitigation strategies recommended within the aforementioned EIS would be sufficient to manage project impacts on the site's existing natural heritage features, which, again, include Significant Wildlife Habitat, Marsh Breeding Bird Habitat, Reptile Hibernaculum, Bat Maternity Colonies, and Sensitive Bird Breeding Habitat, as well as Old Growth Forest, Significant Woodlands, wetlands, and watercourse.

The project EIS places substantial emphasis on ecological offsetting as a means of mitigating, while neglecting to provide the necessary context to make this approach effective. While the total area of vegetative disturbance for this project would be 13,960 m², of which 9,215 m² has been classified as Provincially Significant Woodland, the EIS indicates that only 9,274 m² of candidate ecological offsetting area exists on site. This would translate to a less than 1:1 offset ratio which, by Federal standards, is grossly insufficient. There is a substantial and growing body of literature on ecological offsetting which clearly demonstrates that strict and ambitious requirements are necessary for effective offsetting, including net-gain objectives and **high compensation ratios** (Droste et al. 2022; Ermgassen et al. 2019; Grimm et al. 2019; Harper & Quigley, 2005; Poulton & Bell, 2017; Suding, 2011). The nearby Lake Simcoe Region Conservation Authority's Ecological Offsetting Policy, for example, requires a replacement ratio of 2:1 for the areal extent of any woodland feature.

The OFAH is especially concerned about the impacts of the proposed development project on Kincardine's most unique water feature, the Little Sauble River. This river has a rich history in the region, sustaining local ecology, valued recreation, and even livelihoods. As a spawning location for Great Lakes steelhead, Coho and Chinook Salmon, Brown Trout, and more, the Little Sauble has become a popular destination for generations of anglers. It is valued so highly, in fact, that much of the watercourse is a Provincial fish sanctuary for part of the year.

This very section of water, deemed important enough for Provincially recognized protections, now runs through the proposed development site. We are not satisfied that the proposed mitigation, already demonstrated to be the minimum protections necessary, will be sufficient to protect this invaluable resource. Despite clear requirements by the Municipality, for instance, no comprehensive stormwater management plan has been developed, nor a water quality assessment. In the absence of these things, it is impossible for the Municipality to have effectively assessed the level of risk this project poses to the aquatic system and, therefore, to ensure fulfillment of their obligation to ensure against pollution and loss of fish and fish habitat.

Fortunately, an independent study was performed by Aquatic Ecostudies Ltd. in October 2023, which concluded that "water quality, as reflected by the benthic macroinvertebrate community, was badly impaired." Evidently, the Little Sauble River has no further capacity to accommodate new development and associated runoff, stormwater, and sewer discharges.

The OFAH, therefore, strongly encourages the Municipality of Kincardine to reconsider their position on this particular development project, and to prioritize the creation of a watershed-wide stormwater management plan. We thank you for your consideration and welcome any opportunity to work together for the betterment of conservation now and into the future.

Yours in Conservation,



Matthew Robbins
Fish and Wildlife Biologist

MR/jb

cc: OFAH Zone H Executive
OFAH Fisheries Advisory Committee
OFAH Land Use/Access/Trails Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Executive Director (Incoming)
Mark Ryckman, OFAH Manager, Policy
OFAH Policy & Programs Staff

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