

05 February 2020

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By E-mail

Jacob,

Re: Land Use Management - McIntosh Property (GSCA file P19531)

In October 2019, an Environmental Impact Study (EIS) was prepared for the property at 145166 Sideroad 16 in the Municipality of Meaford (hereafter referred to simply as "the Property"). The EIS was prepared for consideration in the planning approval process as it would apply to the Property owner's intentions of establishing a camping facility at the Property. The EIS Report has since been reviewed by the Grey Sauble Conservation Authority (GSCA) and comments¹ have since been provided by the GSCA. In reference to the EIS, the GSCA comments include the following:

"While our office is generally accepting of the EIS, pre-consultation comments provided by our office indicated that passive and recreational land uses associated with the establishment of a campground may negatively impact the above noted natural heritage features, and that this aspect should be addressed in the EIS. This was not substantially addressed as part of the EIS. As such, our office recommends that an addendum to the EIS is completed to address these concerns, perhaps through the completion of a recreational and enhancement plan."

This letter is submitted to serve as an Addendum to the EIS and to address the matter of potential impacts resulting from passive and recreational land uses associated with the proposed campground. For this purpose, there are three core elements of content to this letter, as follows:

1. a review of EIS findings of relevance, particularly in regard to natural heritage elements that could reasonably be deemed susceptible to land use changes and recreational activities,
2. a brief qualitative assessment of the potential effects of anticipated recreational activities and land-use change on susceptible elements of the natural environment, and

¹ Letter from Jacob Kloeze (GSCA) to Matt Smith (Municipality of Meaford). 13 December 2019. Re: Zoning Amendment Z07-19. GSCA file No. P19531.

Reference: Land Use Management - McIntosh Property

3. a series of recommendations to avoid or mitigate any effects that may be associated with the proposed recreational land use at the Property.

Summary of Relevant EIS Findings

The following is a summary of EIS findings that are deemed relevant to the assessment of potential implications of recreational land use at the Property, and also relevant to the development of planning and mitigation recommendations.

- About half of the McIntosh Property is occupied by cultural communities, including an agricultural field in the core of the Property where campsites and amenities will be established.
- The remaining half of the Property is occupied by woodlands that consist primarily of relatively young deciduous forest communities, a number of which reflect a some level of cultural influence.
- There are two watercourses which traverse the Property which are tributaries to Oxmead Creek, and may provide indirect habitat function for fish communities in that larger watercourse.
- The man-made pond in the southeast corner of the Property supports communities of aquatic flora and fauna, including fish, amphibians and turtles.
- The meadow marsh area in the northwest corner of the Property may support a limited amphibian community.
- There is a reasonable likelihood of occurrence of common reptiles (e.g. Eastern Garter Snake) within the Property, most likely in the areas of natural vegetation cover.
- The woodlands within the Property generally provide limited ecological function, and are not expected to meaningfully support Species at Risk (SAR), Species of Conservation Concern (SOCC), or Significant Wildlife Habitat (SWH).
- The Eastern-wood Pewee is the only species of concern that has a reasonable likelihood of occurring in the woodlands within and near to the Property. This species might nest near woodland edges in relatively close proximity to proposed campsites.

Impact Assessment

At present, there is a general absence of well-developed and accepted protocol or EIS precedents for the assessment of impacts of recreational land use on wildlife and the natural environment. As a general rule, the assessment of human-wildlife interactions that can lead to negative impacts can consider three general categories. The categories, in order of potential severity, are as follows:

1. exposure to stimuli (light, noise, motion) without close or physical contact,

Reference: Land Use Management - McIntosh Property

2. habitat alteration (e.g. establishing new trails, brush removal, litter, contamination),
3. direct physical contact (stepping on or harvesting plants, motor vehicle collisions with wildlife, other encounters with wildlife)

The assessment herein follows a largely qualitative approach and considers these three categories of effect, with the assumption that there will be no consumptive activities (hunting, fishing). It also takes into account several other factors that relate to the specific conditions and circumstances at the Property, including:

- the anticipated activities and land use patterns associated with the proposed camping facility, particularly as they might represent significant change in levels of disturbance relative to current conditions.
- the characteristics of the natural environment, particularly as they indicate the presence and spatial distribution of particularly important or sensitive elements,
- the possible presence of nocturnal species that might be sensitive to noise or light-related disturbance at night,
- the possible presence of winter-active species that might be prone to negative effects during times of resource scarcity and associated metabolic stress.

The current land use in and around the Property is a mix of agricultural and low-density rural residential. With agricultural and residential uses established, there is at present some level of regular human presence, activity and recurring landscape disturbance within and around the Property.

The establishment of a multi-site camping facility with basic amenities (well-water and septic servicing, communal shower and kitchen facilities, parking) will certainly increase human presence within the Property. The core of the Property where campsites and amenities are proposed is entirely under agricultural land use at present. As a result, this area is generally lacking in ecological function in its current state. Operations will be mainly seasonal (i.e., May to October) but will include some capacity for winter operations, resulting in a seasonal expansion of human presence in the agricultural area.

If all camping-related activity is confined to the proposed campsites and supporting facilities, the risk of any of the three identified categories of impact is confined primarily to the current agricultural lands. Given the general absence of wildlife and wildlife habitat functions in this area, particularly any that are a conservation priority, the risk of occurrence of impact relating to direct contact or habitat alteration is very low, and the consequences are also very low.

It is possible that wildlife in woodlands or other natural areas adjacent to the active camping area could be exposed to light, noise or motion. High levels of such stimuli might repel or otherwise disturb some species. Based on the findings of the EIS, the woodlands and other natural areas within the Property support a modest abundance and diversity of common wildlife species, none of which are known to be particularly sensitive

Reference: Land Use Management - McIntosh Property

to disturbance. While the actual level of disturbance will depend on the specific activities of campers, it is not considered likely that occupants of a dozen camp sites would generate light or noise that would result in high levels of disturbance of the wildlife assemblage that is present within and around the Property. Overall, the likelihood that impacts of this nature would be consequential is considered to be very low. This type of impact is also subject to various measures that would reduce the risk, as recommended later in this letter.

There could be additional risk of all three types of impact if there is any allowance for activities outside of the active camping area, resulting in human presence in woodlands and other natural areas. This could include hiking, cycling, cross-country skiing, nature watching and potentially activities involving motorized vehicles. Establishment of trails or other access routes for these activities would result in some direct alteration of natural habitat. Access by campers could lead to contamination, disturbance or direct physical encounters with wildlife. The risk of such effects does in part depend on the extent of access and the specific activities permitted. The risk is partly limited by the relatively small capacity of the campground. The risk is also inherently limited by the nature of wildlife assemblages within the Property (i.e., modest abundance and diversity and an absence of conservation priorities). Overall, the risk of impacts associated with access to natural areas outside the active camping area is considered to be low, but various mitigation measures are provided for consideration under various circumstances.

Recommendations:

Despite what has been deemed to be a very low level of risk, there are still a number of precautionary recommendations that are intended to eliminate or reduce the risk of impact. The recommendations below are intended to be supplemental to the recommendations put forth in the EIS Report of October 2019.

In a number of cases, the recommendations are offered under conservative assumptions regarding the nature of the proposed facility or activities. The choice to implement any recommendation is in part dependent on the validity of those assumptions.

There is research indicating that recreational activities involving dogs or motorized vehicles have relatively high potential to cause adverse effects on wildlife, particularly direct physical encounters which can have the most serious consequences. Accordingly, mitigation measures relating to these specific uses should be prioritized.

There are a number of measures that can reduce or eliminate or reduce the risk of direct encounters with wildlife that may be detrimental. Some of these measures also reduce the risk of disturbance associated with exposure to stimuli.

- Consider the prohibition of motor vehicle use within the Property outside of the access road and parking area.
- A prohibition of pets could also be considered, but there are other measures which can effectively address the associated risk.

Reference: Land Use Management - McIntosh Property

- If permitted, pets should be kept under control, preferably using leashes or kennels. Restrict the presence of pets in natural areas.
- If desirable, a controlled off-leash area could be established somewhere within the existing agricultural field in the core of the Property.
- To avoid attraction of wildlife into the active camping area, campers should be advised of certain practices:
 - keep all food, including pet food, properly stored,
 - properly dispose of waste in designated locations,
 - clean and store cooking vessels,
 - clean grills and BBQs,
 - do not feed wildlife, either intentionally or by leaving out food that they may find and eat.

There are additional recommendations which can serve to reduce the risk of disturbance due to exposure to various stimuli. The level of such risk associated with the proposed campground is very low, and these recommendations are considered to be of lower priority.

- where exterior lighting is installed, use down-cast or back-shielded lighting fixtures
- use timers or otherwise limit the duration and extent of lighting during the over-night hours
- establish quiet hours over the period after sunset and before sunrise
- establish buffer plantings between campsites and wooded areas to attenuate light, noise and visual disturbance. Use native woody trees or shrubs, including some conifers to achieve year-round effectiveness

In the event that trails will be established to provide campers access into natural areas, there are several recommendations which would reduce the various associated risks.

- use existing ATV trails and avoid or limit the creation of new trails.
- manage trails to avoid erosion and runoff (install water bars, limit slope, cover with mulch), particularly within 30 m of watercourses
- avoid establishing trails in low areas that are known to be wet at times
- direct campers to stay on established trails and leave natural areas as found - take only pictures
- consider access restrictions in the winter season if there are active congregations of wildlife (e.g. wild turkey, deer) within the Property

Reference: Land Use Management - McIntosh Property

In regard to natural environment protection and also human safety, the management of fire risk is an important consideration.

- consider prohibition of open fires, or provide dedicated fire pits or rings of reasonable size
- establish clear rules for campers in regard to managing campfires (if permitted). Always attend campfires. Always extinguish fires before going to bed or when leaving the campsite.
- prohibit collection of any firewood (live or deadfall) from natural areas

As an overall measure that may reduce risk of impact and create a broader general benefit, it is also recommended to encourage campers to interact with natural spaces consciously and with care, and to foster awareness and promote conservation and stewardship.

Closing

Based on the information considered, the likelihood that recreational land use associated with the proposed camping facility will have meaningful adverse effects on the surrounding natural environment is considered to be very low. Various recommendations have been provided as precautionary measures to be implemented at the discretion of the Property owner. Measures relating to motorized vehicles and pets should be considered as the highest priority.

If there are any questions or concerns regarding any of the content of this letter, or the subject matter in general, please do not hesitate to contact me at your convenience.

Sincerely,



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cc via e-mail: Krystin Rennie (Planner, Georgian Planning Solutions)
Scott McIntosh (Property Owner)

