

KNL's development plan is not sustainable. Its environmental impact is significant and cannot be mitigated. Studies have shown that the KNL development will be "very challenging". The overall benefit permit requested by KNL for this development should not be granted. KNL must demonstrate a net benefit to the species. As the EBR posting states, an overall benefit "is more than no net loss."

The proposal states that the development will destroy up to 124 hectares of Blanding's Turtle habitat. If KNL is permitted to destroy overwintering wetlands and create other ponds for the turtles to hibernate in then this would be an experiment, not necessarily a net overall benefit to the species.

It is difficult to imagine how anything resembling an overall benefit can come from destroying more than 100 ha of habitat. All the Blanding's Turtles in that area would be re-located and must somehow be kept from returning. If even a few adult females are left behind and die during the process then this is not an overall benefit as the demographic structure of turtle populations requires extremely high rates of adult survivorship.

Those turtles that are re-located may be moved to areas outside their normal home range. They will likely attempt to return to their previous home range as many translocation studies have demonstrated. Turtles making such long distance movements are likely to have to cross many roads and face a high probability of being killed on roads.

The proposal to "creating nesting and overwintering habitat near or adjacent to suitable wetland habitat" is highly speculative as experience demonstrates that wild species seldom follow our dictates with respect to populating 'created' habitat.

A 2012 study, "Structural and Functional Loss in Restored Wetland Ecosystems" found that "biological structure in restored or created wetlands recovered to only 77% (on average) of reference values, even 100 years after restoration" and warned against this practice as a way to justify further degradation.

Earlier studies of this population have shown that without careful protection efforts it will not survive development. Extensive habitat loss and a significant increase in traffic generated by the proposed development will lead to an increase in turtle mortality.

Given that an individual Blanding's Turtle can live for more than 50 years, any actions taken to benefit the species must be maintained for many decades. This includes nesting habitats, fencing and created wetlands. Creating a nesting habitat that is only maintained for 20 years is not an overall benefit to a species that can live for so long.

Working around the perceived habitat of the Blanding's Turtle will not prevent the death of turtles in the area since their ongoing proximity to the development would pose a constant threat to their numbers.

This is a massive project that will have a major impact in removing what is an important natural area.

Given the extent of the residential and supporting infrastructure proposed, it is very unlikely that retaining a small number of the 120 Butternut trees to be removed qualifies as "overall benefit". Nor will archiving and tending to seedlings compensate for the destruction of 120 rare, mature Butternut trees.

Given the placement of this proposed development within the already protected South March Highlands, the right thing to do is to reject this proposal based on the future risks to numerous species and immediate damage that would be done were the development to proceed.