



Greenspace Alliance of Canada's Capital
Alliance pour les espaces verts dans la capitale du Canada

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7 October 2013

Dear Members of Council,

Re: Urban Natural Features Strategy Update
Planning Committee, October 8, 2013, item 3

The Greenspace Alliance of Canada's Capital objects to the change in the UNA strategy proposed in this update. Our belief is that the proposed changes are in error both procedurally and with respect to the assessments being made. In brief, our concerns are that:

- the strategy changed without seeking public consultation, which represents a serious lack of transparency and accountability;
- environmental protection efforts which had been endorsed following public consultation are “defunded;”
- the areas being targeted for protection are reduced, without any assessment of the impact of abandoning the remaining urban natural areas; and
- the report has only vague assertions that lands have "some form of protection."

We also briefly draw your attention to three specific natural areas of concern, Fernbank Wetland and the Poole Creek Corridor and Upper Poole Creek Wetland.

The following points outline our objections:

Firstly, the attempt to significantly change the strategy without seeking public consultation represents a serious process flaw. Since the creation of the initial strategy was based on public input, any significant changes to that strategy should also require public input. Otherwise, the public is left with the false impression that the city is following through on the previously agreed upon strategy. Such an approach is seriously lacking in transparency and accountability.

Secondly, with regard to process, originally \$38 million over 10 years was to be allocated to the Strategy. Including land exchanges, \$21.1 million is said to have been spent. Thus, the proposed termination of the land acquisition policy, without any

statement regarding the remaining funds that were to be set aside, represents significant “defunding” of environmental protection efforts. These funds were allocated following public consultation and using them for other purposes without public consultation lacks transparency.

Further, validation of the recommendations made by staff is incomplete or debatable. One point of significant concern is the comment in the report that many areas within Ottawa now have "some form of protection." This comment needs supporting detail if the public is to feel confident that the city has even achieved the 61% protection coverage as claimed. In any case, this target of 61% protection is too low and seeing that it is not even defined in a rigorous manner, we suspect that the true level of protection is even lower. Keep in mind that this target is reduced from the original 2816 ha of UNA lands to the 1726 ha in the Strategy adopted in 2007; now with 1613 ha claimed to have "some form of protection" staff wants to call it quits and abandon all remaining urban natural areas.

Nor should one lose sight of the fact that the UNA evaluations had a size threshold of 0.8 ha. There are quite a few spots in town that are less than 2 acres and are very much valued by local communities. They should not be abandoned either.

Another point of concern with the recommendations is the statement that land acquisition is less efficient than it once was. This is almost always the case as land values continually increase. In our opinion, this does not reflect long term thinking nor is it a valid justification to stop spending for land acquisition, but is instead a reason to more aggressively pursue the spending activities within the projected budget. Were these funds to be directed towards other activities for environmental protection, there might be an argument as to how best to spend the funds, but the decision to not spend the money at all is not logically valid. Making such a decision indicates that urban natural areas and environmental protection are expendable.

In addition, the report is lacking in that it provides no evidence of an analysis of the possible effects on Ottawa’s natural heritage system that would come from abandoning the remaining natural areas. The information provided suggests that the assessment was limited to financial concerns and making sure that a natural area is available within 400m of people’s homes. This is an incomplete analysis because it minimizes the importance of urban natural areas in terms of wildlife habitat and watershed value.

Likewise, the analysis of alternative funding options and protection mechanisms in Document 2, which are conceded to have potential "on a case-by-case basis," does not then take the next step and offer an assessment of how they could be applied to the remaining UNAs which this Update seeks to abandon.

Our final concerns arise with regard to the proposed handling of three specific natural areas: UNA 132 (Fernbank Wetland) and UNAs 27 and 28 (Poole Creek Corridor

and Upper Poole Creek Wetland). With regard to the Fernbank Wetland, the problem is that, having protected only a portion of a wetland, that portion is likely to be degraded. Changes in water levels, water flow and the loss of buffer vegetation that will arise from the development of the adjacent lands can all degrade the environmentally protected area. We refer specifically to the development application for 6279 Fernbank Road. Issues raised last August by a private citizen have caused the application to be put on hold a week later. One of the issues raised is the very survival of the Urban Natural Feature (part of UNA 132).

With respect to the Poole Creek Corridor and Wetland, a similar argument holds. The staff report indicates that most of the portion of UNA 27 not owned by the City is constrained by flood plain but the Mississippi Valley Conservation Authority has a history of allowing development in flood plains. In order to achieve true protection, the City should acquire the portions of both UNAs it does not own that could otherwise be developed.

These are just three examples of UNAs that are of concern. There are many others. A more systematic analysis is called for which this report does not offer.

In conclusion, the proposed recommendations are seriously flawed because they propose to halt the acquisition of urban natural areas without having protected the areas that have been assessed as worthy of consideration and without having spent the funds that were projected for the program. At the same time, it appears to us that the proposed recommendations are being introduced in a manner that avoids public scrutiny and undermines efforts targeted toward environmental protection.

We therefore strongly recommend that the Planning Committee send the update back to staff with instructions that they perform more comprehensive analysis and conduct meaningful public consultation in order to ensure that the long term viability of the City's urban natural features is protected, and report back to the Planning Committee within six months.

Thank you for your attention.

Erwin Dreessen,
Co-chair