

RESPONSE FROM THE OTTAWA-CARLETON WILDLIFE CENTRE (OCWC)

DRAFT PROTOCOL FOR WILDLIFE PROTECTION DURING CONSTRUCTION

We have carefully reviewed the draft Protocol for Wildlife Protection during Construction and fully support its recommendations. We believe that this Protocol lives up to the City of Ottawa's commitment, within the Wildlife Strategy, for adopting progressive practices in wildlife-sensitive planning and for providing the general public, as well as industry stakeholders, the tools to better coexist with wildlife.

There is no question that this is what the public wants. It was an individual working in the construction industry who, familiar with the damage to the environment and the inhumane consequences for wildlife, urged his City Councillor to support a Wildlife Strategy in 2010.

We can also attest to the concern of the public as a result of calls to the conflict telephone hotline the OCWC operated with funding support from the former Region of Ottawa-Carleton. The hotline annually received between 8,000-10,000 calls from Ottawa residents from 1987 to 2002. A significant number of these callers reported that they had not experienced any problem with wildlife until a particular development had resulted in the loss of natural habitat for wildlife in their neighbourhood. They were sympathetic to the plight of the animals and were frustrated that better planning had not been used to prevent problems.

This prompted the OCWC in 1999 to propose a Wildlife Construction Protocol that was approved by the RMOC in 2000. We are delighted that a long-awaited Protocol is moving forward and that the revised and updated version effectively addresses the concerns around key issues such as adhering to sensitive timing windows for construction, pre-stressing which provides time for animals to escape, construction site management, and guidance to developers on how they can help reduce post-construction conflicts between residents and wildlife.

We are pleased to endorse the draft Protocol along with a few recommendations that are, in our experience, needed to properly support it:

- 1) Environmental Impact Statement Guidelines:** Because the EIS Guidelines address impact assessment and mitigation during the development planning and review process, they need to be consistent and clear when it comes to protecting wildlife. The OCWC has argued previously that you cannot protect what you don't know. For mammals, particularly in larger natural areas undergoing a development application review, it is essential that existing conditions reporting include a winter assessment. The majority of mammals are nocturnal and it is only in winter that their presence can be determined through tracking. While Appendix 7 in the EIS Guidelines on Mammals states "*tracking is usually best during winter (in fresh snow)*", a reference in the same document, The EIS Process 2.2 Step 2: Information Gathering and Report Preparation, contradicts this by stating "*site visits will occur during the growing season rather than in winter*". We request that this be changed in the EIS Guidelines to clearly state that winter must be one of the seasons required for observations.

- 2) **Site Alteration By-law:** On-going incidents involving the destruction of trees and other vegetation, including that adjacent to significant wetlands, demonstrate the need for the City to adopt a comprehensive Site Alteration By-law.
- 3) **Existing Conditions Reporting:** More resources are required for staff to carry out the field work needed in order to verify the accuracy of existing conditions reports. The need for reliable information that is incorporated into the earliest stages of the development approval process has been shown in the disparities between reports prepared by the developers' consultant in the Kanata North project and photographs and field observations undertaken by residents. Given that residents are increasingly concerned and vocal about development, it would also be worthwhile for City staff to utilize the knowledge of local residents with respect to current conditions.
- 4) **Process:** The consultation process established by Planning staff with respect to the Wildlife Construction Protocol has been excellent thus far. Stakeholder groups were identified at the outset, sufficient time and assistance was provided to ensure every opportunity for input, comments were then posted along with the names of the groups that had responded and the current public consultation was launched at a time (after the holiday season) that conveyed the City really did want to hear from people.

We urge that input to the public consultation, now underway, maintain the same level of transparency and professionalism.

- 5) **Encounters with Wildlife during the Birthing Season:** Given that the birthing season for wildlife is to be avoided during construction, it is unlikely that this suggestion will be needed. However, given that there might be a rare exception and because the following situation occurred at least a half dozen times each year when the OCWC operated the telephone hotline service, we felt it worthwhile to mention it. In 2.6 Wildlife Encounters or in Appendix 2 under Wildlife Encounters you might include *"If an animal has given birth in a building under construction (this generally happens over a weekend), place a piece of clothing with human scent in the vicinity of the nest (the nest is often in a little used area), carry on with work in the building so that the animal knows this is not a safe place and give her overnight to relocate her young"*. This always resulted in a successful outcome whereas an attempt to move the babies or chase the adult resulted in orphans.
- 6) **Educational Materials for New Homeowners:** Owner Awareness Packages should include the excellent *'Backyard Wildlife'* handbook produced by Let's Talk Science for the City of Ottawa. Having developers fund the printing of this material would not only provide for wider distribution of the handbook but it would present an opportunity for the developer's name to be associated in a very positive way with a helpful and progressive initiative in the community.

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