

WILDLIFE CONSTRUCTION PROTOCOL

FURTHER COMMENTS – OTTAWA-CARLETON WILDLIFE CENTRE

We are providing further comments to the Centre's submission sent on January 22, 2015. We do so given the apparent misunderstanding and/or misrepresentation of the draft Protocol's recommendations.

Wildlife-Sensitive Timing: The recommendation in the draft Protocol to avoid certain times of the year for **site clearing** is a **key element**. During the winter, hibernating animals will be physically unable to escape while over-wintering species, forced to leave their dens and food caches, will likely freeze or starve to death. During the spring and summer birthing season, newborns will have no chance of survival if their nests or dens are destroyed with them in them.

It is the initial preparation work such as clear-cutting trees and stripping, digging and moving earth that should occur during times that will have the least lethal impact on wildlife. But, let's be clear, once this work is done, and animals are given a chance to escape, the other phases of construction can go ahead in the winter, spring, summer or fall months, whatever is the developer's preference.

The protocol would have greatest application in the development of large natural areas where a variety of wildlife species would be impacted so it is not suggested there be a blanket application of the protocol. Rather, it should be applied on the basis of the individual project and done as part of the tree removal provisions or the conditions of approval.

Large development projects are years in planning, so it's inconceivable that the initial phase of preparing the site for construction cannot be scheduled between mid-August and mid-October. Furthermore, site clearing, as we have seen in a number of recent projects, is done very quickly. Hundreds of trees have been clear-cut in less than a week, so a two-month window of opportunity should not pose an insurmountable problem.

Who Pays: There is nothing in the draft protocol that would significantly increase costs to the development or construction industry. However, without a protocol, it is Ottawa homeowners who are currently having to pay the high costs of wildlife removal (est. \$400) as well as repairing damage to their property, as wildlife forced out of their habitat move to nearby homes.

Partnership Opportunities: For the Protocol to be successful, it will require the leadership of the City, the cooperation of developers and the support and involvement of the community.

There is a great deal to be gained by all three stakeholder groups in moving forward with a progressive model of wildlife-sensitive planning in Ottawa.

There would be opportunities for developers marketing projects advertised as '*being close to nature*' in demonstrating concern for local wildlife and in assisting homeowners with practical tips for '*living with wildlife*' that would save residents money while helping them enjoy and appreciate the surrounding natural area.

The OCWC has considered for some time a '*wildlife-friendly certification*' program for developers that adopt approaches which demonstrate respect for wildlife and biodiversity. Similar to Audubon International's certification for wildlife-friendly golf courses, it is something that the City could do in cooperation with local wildlife organizations which would reflect very well on Ottawa, not only in working with the community, but as an environmentally-progressive city.

This type of branding would also encourage greater stewardship on the part of the community that, in turn, would reduce costs to the City for managing and protecting green space. Ottawa has a highly educated population that values natural areas and wildlife. Residents would welcome and strongly support a progressive protocol.

Transparency and a Level Playing Field: As one of the four stakeholder groups, we have stressed, since the outset last June, the need for transparency. And, as referenced in our comments on January 22, 2015, we had been pleased about the professional process to that date.

However, we are concerned that just days before the established deadline for comments on February 8, 2015, there was an extension granted. Neither of the two community wildlife organizations had requested this extension. More concerning is that just a day or so after the deadline extension was announced, the Greater Ottawa Homebuilders Association (GOHBA) launched a concerted attack in the media, opposing the draft Protocol. The Executive Director of GOHBA not only misrepresented key elements of the protocol but stated that GOHBA had only recently obtained information about the protocol when clearly it would have received information and been asked for its input at the same time as other stakeholders in June of 2014.

We strongly restate our request that the playing field and the process be a fair one with comments from **all** stakeholders and citizens responding to the public consultation posted to the project website. If the City's policy on transparency is to be met, comments need to be on the public record as opposed to going unchallenged in the media or conveyed behind closed doors.

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