

Ottawa-Carleton Wildlife Centre

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June 25, 2015

City of Ottawa
Planning & Growth Management Department
110 Laurier Avenue West, 4th Floor
Ottawa, Ontario K1P 1J1

Attention: Erin O'Connell

**Subject: Comments on Former CFB Rockcliffe Plan of Subdivision Application D07-16-15-0003
335 St. Laurent Boulevard, City of Ottawa**

Dear Ms. O'Connell

Comments on former CFB Rockcliffe EIS Report Section 4.4 Wildlife & Section 7.3 Significant Wildlife Habitat

With respect to these Sections of the EIS the City needs a Wildlife Construction Protocol that can be provided to developers such as Canada Lands for planning purposes. Besides concern for wildlife, it encompasses habitat issues, human-wildlife interface and conflict prevention, coexistence along with people's need for a connection to the natural world.

Background: The Ottawa Carleton Wildlife Centre, working with former councillor Alex Munter, took the need for a Wildlife Construction Protocol to Regional government in 2000. It was prompted by calls from the public to the Centre's telephone hotline – a service primarily funded by RMOC. The Centre received 8,000-10,000 calls a year, the majority coming from urban and suburban residents in communities undergoing extensive development. Many callers said that they had never experienced a wildlife problem before a particular development had displaced wildlife in their neighbourhood. They were sympathetic to the animals and critical that better planning hadn't taken wildlife into consideration. While RMOC provided approval for a Wildlife Construction Protocol, it was never pursued as amalgamation took place a short time later.

In 2013, Ottawa City Council approved a Wildlife Strategy that included a recommendation for a Wildlife Construction Protocol. In June 2014 a stakeholder group that included wildlife experts (the Centre and a wildlife rehabilitation organization) regulatory agencies, developers and environmental consultants were asked to submit comments on a possible Protocol. The draft released by Planning staff in January 2015 received high marks from groups like ours in that it included most of the elements of concern. However, opposition from developers, has managed to have the key aspects of the Protocol substantially watered down.

Some of the comments submitted by the Centre over the course of the last year speak to the issues:

- 1) **Wildlife-Sensitive Planning:** This needs to precede a Wildlife Construction Protocol. *'You cannot protect what you don't know'*. This protocol must go beyond Species at Risk. In nature, everything is connected to everything else, so taking an ecosystem approach to species and habitat preservation is critical. Approved by Council in 2013 and described regularly in letters from mayor Watson to residents, *"the City approved an integrated and comprehensive Wildlife Strategy centred on wildlife-sensitive planning, with a focus on public education and awareness programs"*. Wildlife-sensitive planning is not only needed to protect biodiversity but preserving habitat and providing for linkages and corridors will reduce the potential for human-wildlife conflicts that will otherwise occur while giving people the opportunity to enjoy wildlife in their neighbourhoods.
- 2) **Existing Conditions Reporting:** The City needs to assume responsibility for carrying out the field work to ensure the accuracy of these reports. The need for reliable wildlife-sensitive planning to be incorporated into the earliest stages of the development approval process has been shown in the disparities between the reports prepared by the developers' consultant in a Kanata North project and photographs and field observations undertaken by residents. This point is highlighted in the CFB Rockcliffe EIS where habitat for endangered monarch butterflies is considered 'insignificant' – how is "insignificant" decided and by whom?
- 3) **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. 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"*. A winter assessment should be essential given that the Ministry of Natural Resources and Forestry Technical Manual describes significant wildlife habitat as having *'seasonal concentrations of animals, animal movement corridors and overwintering habitat'*. In this regard we do not believe that the CLC Existing Conditions Report included a winter assessment as it listed very few mammals. However, it did list a coyote under animals observed which indicates to have attracted this apex predator, there would be a wide variety of other mammals that went unreported. Again, surveys of residents and local naturalists could solicit better quality and current data. Animals such as wild turkeys, deer, foxes, rabbits, skunks are often seen in the Rockcliffe area but they have not been reported by the consultants.

- 4) **Sensitive Timing Windows:** The goal of avoiding the most sensitive times of year for the initial clearing of a site, when the greatest harm is done to wildlife, will be a key element in a successful Protocol. 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. Given

large projects that are years in the planning and, as we've seen across the city, are able to be cleared in a matter of days or weeks, it's inconceivable that this initial work can't be scheduled for the least lethal times for wildlife, i.e. late summer and early fall.

This is an aspect that will continue to get public attention as people will not accept that living creatures which feel pain and suffering are not accorded the same degree of protection as trees receive under the City of Ottawa's Tree Conservation Guideline. The initial stripping, digging, moving of earth with heavy equipment and felling of trees should not be an intentional death sentence for the animals that reside there.

- 5) **Wildlife-proofing:** Wildlife, forced out of their habitat, will most often seek shelter on new and existing adjacent homeowners' property. In assisting their clients, developers are encouraged to use wildlife-resistant metal components instead of plastic, heavy screening for roofing vents and other exclusion measures to keep wildlife out of homes. These upgrades would cost very little during the building process but would save homeowners hundreds of dollars spent on wildlife removal and damage repair.
- 6) **Owner Awareness:** Developers can provide helpful information to homeowners, post construction, and present a positive public relations opportunity to reinforce a brand, or promote a project as being '*close to nature*' or one that is also wildlife friendly. The brochure '*Backyard Wildlife*' produced for children and their parents, in cooperation with local wildlife experts, by Let's Talk Science as part of the City's Wildlife Strategy, would be a very useful one for new homeowners in learning how to coexist and to enjoy wildlife.
- 7) **Establish a Wildlife-Friendly Certification Program** for developers that adopt 'best practices' which demonstrate respect for wildlife and biodiversity. This is something the City could do in cooperation with local wildlife organizations that would reflect well on developers as well as on Ottawa's reputation as a '*green and liveable City*'.

Thank you for the opportunity to comment. We believe that this is a project that has the potential to raise the bar on truly liveable and forward-looking communities that recognize the value of nature. We hope to see this promise fulfilled.

Sincerely

A handwritten signature in black ink, appearing to read "Donna DuBreuil". The signature is fluid and cursive, with a prominent loop at the end.

Donna DuBreuil, President

