Greenspace Alliance submission to Planning Committee December 13, 2016 Significant Woodlands Policy OPA 179

1. The Greenspace Alliance of Canada's Capital generally supports the Significant Woodlands Policies proposed as part of Official Plan amendment #179, in particular the provisions regarding the designation of significant woodlands in the urban area of the City as part of the Natural Heritage System. This provides greater certainty regarding their status and preservation.

2. As regards transitional measures, large areas accompanying the amendment are shown as "policy not applicable", presumably because these lands are currently in some active planning stage. We understand that this is to avoid retroactive implementation, with which we agree. However, we propose that the concept of "have reached agreement on the natural heritage system" be better defined as a formal step in the planning process to avoid misinterpretation. For example, in the case of a CDP, this could be defined as Council approval of the CDP. Similar specific language could be crafted for the different planning stages.

3. We agree with the wisdom of working out workable implementation solutions with stakeholders over the next 12 months. We would encourage holding consultations with all relevant stakeholders together, as was done for the Urban Forest Management Plan, so as to enhance openness and transparency and foster mutual learning between stakeholders from all sides of the issue.

4. We note that there are no measures dealing with pre-emptive clearing of woodlands in the peri-urban area during this period of deliberation. While the Urban Tree Conservation bylaw might provide adequate protection, for added surety we propose that a moratorium be declared during this period of deliberation.

5. As regards conveyance of land under 3.11, we understand that the city wishes to avoid taking on inventory of lower quality woodlands but are concerned that the EIS process may undermine the clarity and finality of the 40 year, 0.8 ha rule. We would not want to see woodlands deemed significant based on this rule wholly turned back to development as a result of an EIS process.

6. Finally, this appears to be a one-time determination of significant woodlands, as of the date of the adoption of the bylaw. Would this represent the maximum extent of woodland cover within the urban area in perpetuity? We hope not and would propose that a similar re-examination be made part of the 5 year comprehensive review process. We expect the current, and future reviews, will be guided by the objectives set out in section 2.4.5 of the Official Plan: a target of 4.0 hectares of greenspace per 1000 population, or approximately 16 per cent to 20 per cent of gross land area; a target for forest cover for the entire city of 30 per cent, or as amended through the Urban Forest Management Plan process; a target of providing open space and leisure land within 400 metres of all homes in primarily residential areas in the urban area.

Paul Johanis, co-chair December 12, 2016