# Ottawa-Carleton Wildlife Centre

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Mr. Yves Dagssie, PMP, Special Project Officer
Environmental Approvals Branch,
Ministry of the Environment and Climate Change
135 St. Clair Avenue West, 7th Floor
Toronto, ON
M4V 1P5

**Re: The City of Ottawa: Environmental Project Report (EPR) for the Bayshore to Moodie Bus Rapid Transit (BRT) Conversion to Light Rail Transit (LRT).**

Dear Mr. Dagssie,

We are writing, under the Transit Project Assessment Process (TPAP), to express our serious concern that the EPR fails to address the adverse impacts that this project will have on the Greenbelt and its natural systems.

The Ottawa-Carleton Wildlife Centre has been working on behalf of wildlife and habitat issues in this region for over 30 years. The Centre is located on the Carling Campus in the Core Natural Area (CNA) within the National Capital Commission (NCC) Greenbelt. This CNA is connected via a Natural Linkage (NL) to the LRT project site. This gives our Centre a unique perspective on the impact this project will have on the overall ecosystem.

**Need for Greater Collaboration**

Given that the project is in a valuable and sensitive natural area that is under the protection of the NCC, there needs to be a much more holistic approach to its implementation. Since 2013, there has been substantial development pressure on this greenspace due to the BRT, DND relocation and site alteration at the Wesley Clover Parks property. It is critically important to consider the cumulative impacts on the natural systems in this Greenbelt area.

This means that the City of Ottawa must work with authorities such as the NCC and the Rideau Valley Conservation Authority (RVCA) in a more publicly transparent way in dealing with this area as a whole. This will ensure that the project not only meets the respective requirements of these agencies but can also become a model that demonstrates how collaboration can produce the results necessary for environmental sustainability.

**Protecting Wildlife and Maintaining the Integrity of the Wildlife Corridor**

The Wildlife Corridor runs west from Holly Acres along the Trans-Canada Trail, following Stillwater Creek, crossing Corkstown Road, through naturalized areas connecting the Natural Link (NL) on the east side of Moodie to the west side of Moodie and the Greenbelt Core Natural Area (CNA).

This corridor is essential as demonstrated by the inventory of exceptional biodiversity found on the Carling Campus. It includes 19 mammal species; 130 bird species including the Eastern Meadowlark; 14 reptile and amphibian species including the Western Chorus Frog and close to 300 insect species, the latter being of particular importance considering their decline generally and the impact this has on birds, as well as the contribution insects make to the pollination of agricultural plants.

**Key elements that have not been addressed in the EPR**

The NCC's Greenbelt Master Plan includes requirements that pertain to design best practices for transportation infrastructure projects on its lands: "*Apply context sensitive design best practices to transportation infrastructure projects that aim to conserve Greenbelt natural and visual resources. Take landscape ecology principles into account in order to achieve ecological connectivity and wildlife safety. Include measures that seem to "blend" the infrastructure project into the Greenbelt landscape and protect views. Require the incorporation of wildlife-friendly designs and crossing facilities, where appropriate, in transportation infrastructure projects that affect natural areas on the Greenbelt.*"

Although the EPR references this requirement on page 18, it fails to offer any mitigation measures such as those we outline below.

**Corkstown Road:**

1) Safe passage for wildlife across Corkstown Road is essential but is not referenced in the EPR. The increased traffic on Corkstown Road as a result of the LRT will compromise a key link, putting wildlife at greater risk and increasing occurrences of dangerous and costly wildlife/vehicle collisions. The high price of these incidents and cost-effective wildlife crossing alternatives are outlined in the following article: https://www.fastcodesign.com/1662800/can-a-wildlife-bridge-fix-americas-8-billion-roadkill-problem

   Creating an underpass on Corkstown Road, east of the Moodie Station, is necessary to mitigate the risk for small and large wildlife as well as people.

2) The realignment of Corkstown Road must provide a 30m buffer along the entirety of Stillwater Creek, including the area closest to Corkstown Road as that will be the point where wildlife are most at risk and the potential for the pollution of Stillwater Creek is greatest. A 30m buffer as a 'no touch riparian area' along all of Stillwater Creek is the only reasonable solution. This buffer, where disturbed, needs to be revegetated with a blend of native deciduous and coniferous trees and shrub materials.

**Holly Acres:**

1) The removal of a drainage ditch during BRT construction at Holly Acres Road needs to be restored once the BRT is closed as this ditch was well used by wildlife.

**Moodie Drive:**

1) Moodie Drive connects the Greenbelt's Natural Link (NL) on the east side to the Core Natural Area (CNA) on the west side. While this may not be part of the LRT/BRT scope, it is critical for this issue to be addressed in a holistic way that involves all of the partners.

   The substantial increase in traffic on Moodie Drive will not only severely disrupt connectivity between key natural areas of the Greenbelt, it will cause direct harm to wildlife, decrease biodiversity and increase risk to motorists. An underpass is needed to address this concern. A solution is presented later in this letter.

   Road ecology science is well advanced in North America, as demonstrated by national conferences in Ottawa in 2014 and more recently in Quebec City, "Road ecology and climate change adaptation" in October 2017. Major transportation projects in the Nation's Capital, particularly on the Federal Greenbelt, need to reflect these advances.

   Utilizing Best Practices such as those implemented by the City of Edmonton's Urban Wildlife Passage Program. The City, in 2007, initiated a Wildlife Passage Program with the goal of maintaining habitat connectivity. It resulted in a 250-page document 'Wildlife Passage Engineering Design Guidelines' that, along with the characteristics and habitat needs of a wide variety of species from mice to moose,

identifies transportation and ecological network components, potential conflicts with wildlife and a detailed mitigation toolbox. It provides easily understood and accessible information on wildlife passage design. A short video can be viewed at: https://www.youtube.com/watch?v=UFOgr3pzPXo

**Restoring and Protecting the Health of Stillwater Creek:**
The EPR states that Stillwater Creek serves as the drainage basin for 23 square kilometers of land. The BRT has already severely impacted the Creek as can be seen in the flooding of the area during rain events, increased volume and velocity of water causing significant erosion, bank undercutting and the loss of mature trees.

Not only will this damage require remediation but, with the construction of the LRT Station in the flood plain and its additional infrastructure, these serious problems will get much worse.

This situation requires that mitigation occur earlier upstream before reaching this 'pinch point'. It only makes sense to utilize the degraded wetland on the west side of Moodie, just a few hundred meters away, to provide the water storage that building on a flood plain necessitates.

Utilizing this wetland would also allow an improvement to the Stillwater Creek culvert under Moodie Drive which, in turn, can provide the safe wildlife passage needed for large and small animals, referenced earlier.

**Summary**
A commitment to safe passages for wildlife and stormwater/flooding solution options must be anchored in the EPR, rather than having to rely on the goodwill of later discussions.

The LRT Stage 2 Extension to Moodie Drive offers a high-profile opportunity to demonstrate the leadership needed to ensure the protection of key natural features and biodiversity within the Greenbelt while, at the same time, building a modern transportation system in the Province of Ontario. It is a project that must aim to provide a net environmental gain while serving as a positive example of Green Infrastructure.

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