Hunt Club Pine Plantation

I am writing on behalf of the Greenspace Alliance of Canada's Capital to signify our opposition to the plan to cut down a 1.57 ha section of a red pine plantation to make way for a surface parking lot and storage yard for the BMW car dealership at 400 Hunt Club Road.

Contrary to what is stated on page 15 of the Combined Environmental Impact Statement & Tree Conservation Report, this stand of trees should be protected as a significant woodland as it meets the threshold established in the Significant Woodland Policy for Ottawa's urban area.

From the McKinley report:

> *3.3.2 Significant Woodlot Assessment*
>
> *The Site is within the urban area of the City of Ottawa, and hence the City of Ottawa's urban area criteria for Significant Woodlots apply. The City of Ottawa's urban area criteria recognize woodlots which are both ≥0.8 ha in size and older than 60 years of age as Significant Woodlots (City of Ottawa 2019). As described above in Section 3.2, the Red Pine Plantation is approximately 55 years of age, and hence is too young to qualify as part of a Significant Woodlot under the City of Ottawa's urban area criteria.*

The consultant based this assessment on an aerial photograph from 1965, sourced from the City of Ottawa. For some unexplained reason, they failed to move the slider on GeoOttawa to 1958, where they would have seen the attached aerial photograph, which clearly shows, when zooming in, that the plantation was there in 1958. So it is at least 63 years old.

The consultant was also mistaken in referencing the version of the Tree Conservation bylaw that would be applicable (page 8):

> *Tree Removal Permit: The City of Ottawa will require obtainment of a Tree Removal Permit under the Urban Tree Conservation By-law No. 2009-200 prior to the commencement of tree clearing.*

As this application was received on May 13 2021, the Tree Protection By-law (By-law No. 2020-340), which came into effect on January 1 2021 would apply. This application would be covered by Part IV of the new bylaw, which includes compensation requirements for tree removals.

We also object to this statement in section 4.1 of the report.

> *4.1 Terrestrial Habitat and Tree Removal (TCR) The development, grading, and construction requirements within the Site are such that there are no opportunities for tree retention within the Site. All trees within the proposed development area will be removed in order to accommodate the development of the Site.* ***As described above, the Red Pine Plantation is not considered a significant ecological feature, and therefore tree removal is not anticipated to significantly negatively impact the natural features and functions of the Site.***

This stand of pines, part of a larger 22 ha plantation, is part of the City's Natural Heritage System for a reason. It is, by definition, part of a significant ecological feature. That feature, and be ecological benefits derived from it, would be degraded by this development. These benefits include improved air quality, mitigation of climate change through CO2 absorption, and adaptation to climate change though intrinsic cooling, shading and water absorption and retention. This is in line with PPS 2020 1.8.1, which should be added to the list of relevant PPS statements on pages 7 and 8 of the Planning Rationale.

> *1.8.1 Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and preparing for the impacts of a changing climate through land use and development patterns which:*

f) promote design and orientation which maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation and green infrastructure; and

g) maximize vegetation within settlement areas, where feasible.

Based on the reasoning put forward in the TCR for removing these trees, the entire 22 hectares of the plantation would not be considered a significant ecological feature, and its removal would not significantly negatively impact the natural features and functions of the site.

Using an industry standard for pine plantations of 2300 trees per ha, there would be 3600 trees on the subject property. Using 22 kg per year CO2 storage per tree (https://www.usda.gov/media/blog/2015/03/17/power-one-tree-very-air-we-breathe), cutting all these trees would remove 79.2 metric tonnes of annual carbon storage. There are likely 50,000 trees on the entire plantation, representing 1,100 metric tonnes of annual carbon storage. Surely its removal should be considered as having a negative impact.

The plantation does not only have ecological value. As a woodlot, it has economic value, which seems to have been sadly neglected over the years. A well-managed woodlot would have been regularly thinned and harvested, allowing for undergrowth to develop in those areas. Patches of hardwoods would have been promoted within the plantation, through planting or natural regeneration. But it's not too late. According to this Government of Ontario publication (http://www.lrconline.com/Extension_Notes_English/pdf/mngng_rd_pn.pdf), a red pine plantation has a 75 year economic lifespan and could still be properly exploited and eventually converted to another type of urban significant woodland. The publication helpfully contains this statement:

> *"Many people view red pine plantations as sterile forests that provide little to no environmental benefits. Research has shown this to be untrue. As plantations mature, they begin to transform old field sites into forest conditions. The increase in organic material in the soil from the shed needles helps to prevent erosion from wind and water. As the stand is thinned, the increase in sunlight reaching the forest floor provides ideal conditions for native hardwood and conifer species to germinate and grow. The diversity of plants and animals will also increase."*

Which brings us to the use of this land area for parking and car storage instead. Vast surface parking is a very inefficient land use contrary to PPS 1.1.3.2 (see page 7 of the Planning Rationale). It would seem to us that if additional parking and vehicle storage must be located on site then some kind of stacking solution would be a more efficient use of land. Perhaps this could be combined with automated and mechanized parking solutions. Ottawa is a hotbed of research on autonomous vehicles and partnerships with local R&D could be fruitful. Such an innovative and eye catching solution would pair well with the BMW brand.

Questions may be raised regarding the applicability of the City's Significant Woodland policy and Tree protection bylaw as this land is under federal government ownership. As per the Ottawa Hospital Master Site Plan Control application, the proponent, also a lessee of the federal government, agrees to subject itself to municipal bylaws regarding tree protection and retention, on a "good neighbour" basis. We note that McKinley also states in the TCR that these municipal policies apply to the current application. We would expect the proponent in this case to take the same position.

Paul Johanis

Chair, Greenspace Alliance of Canada's Capital

Hunt Club plantation, 1958

Source: GeoOttawa, City of Ottawa