

## Public Consultation Summary: Submissions and Responses

### Summary

Public consultation on the Wildlife Strategy took place in three ways:

- Formation and consultation with an *ad hoc* working group of City, agency and public stakeholders;
- Informal consultations by the City project manager with other experts and stakeholders not represented on the Working Group;
- Posting of the final draft document on Ottawa.ca for one month of public review and comment, along with associated public service announcements.

### Wildlife Strategy Working Group

Work on the Wildlife Strategy began with the formation of a working group to assist staff in its preparation. Staff assembled a working group consisting of representatives from the City and other agencies and representatives of community stakeholders. Initial membership was by invitation of the City's Project Manager, although the working group had the option of adding additional members, subject to approval by the City's Project Manager and maintenance of the approximate balance between City/agency and community representatives.

The Working Group initially included the following members:

- Nick Stow, City of Ottawa, Planning and Growth Management
- Roger Chapman, City of Ottawa, By-Law and Protective Services
- Adam Brown, City of Ottawa, Rural Affairs
- Heather Hamilton, The Ottawa Forest and Greenspace Advisory Committee (OFGAC)
- Mike Lascelles, the Environment Advisory Committee (EAC)
- Richard Fraser, the Rural Issues Advisory Committee (RIAC)
- Scott Smithers, the Ontario Ministry of Natural Resources
- Eva Katic, the National Capital Commission
- Sylvie Lalonde, the National Capital Commission
- Donna DuBreuil, the Ottawa-Carleton Wildlife Centre
- Sol Shuster, the Greenbelt Coalition
- Paul Mussell, a rural community stakeholder recommended by the Rural Affairs Officer and the Chair of the Agricultural and Rural Affairs Committee
- Richard Harrison, on behalf of the the Greater Ottawa Home Builders Association
- Dean Karakasis, the Building Owners and Managers Association

- Elizabeth White, the Ontario Wildlife Coalition
- Anne Tremblay, Ottawa Airport Authority (added by consensus as a non-voting member)

The Wildlife Strategy Working Group had no formal status, but was an *ad hoc* advisory committee.

At the first meeting of the Working Group on May 26, 2010, staff expressed the hope that the Wildlife Strategy would reflect a consensus of the Working Group members, and that the Working Group would have a significant role in writing the Strategy. Staff suggested that terms of reference were required in order to establish the framework of the Wildlife Strategy and the procedures for deliberations by the Working Group. It became apparent, however, that multiple differences of opinion existed between members of the Working Group regarding the scope of the Wildlife Strategy, in addition to general disagreements over specific wildlife issues.

The Working Group met another six times between May 26, 2010 and January 25, 2011. During those meetings, the Working Group received a presentation from the Ministry of Natural Resources regarding its wildlife policies and practices, a presentation from By-law and Regulatory Services regarding the Large Mammal Response Protocol, and a presentation from the Ottawa Airport on its Wildlife Management Plan. There were many discussions regarding current wildlife issues and possible content of the wildlife strategy. At the November 8, 2010 meeting, the Working Group approved the Terms of Reference by a simple majority vote, after failure of the Working Group to reach a consensus.

During this period, staff worked on the Wildlife Strategy as time permitted, assembling background information, reviewing the City's current planning practices and wildlife management practices, reviewing academic and non-academic literature, and surveying the wildlife management practices of other municipalities and agencies.

The January 25, 2011 meeting of the Working Group was followed by a long hiatus in the work on the Wildlife Strategy. Despite previous approval of the Terms of Reference, the staff concluded that too many members of the Working Group felt dissatisfied with them for further consensus, or even a strong majority opinion, regarding the substance of the Wildlife Strategy. Staff concluded that the Wildlife Strategy would need to be written in a more conventional fashion, as a staff report, with review and comment by the Working Group.

By January 2011, however, the staff assigned to preparation of the Wildlife Strategy had become involved in a number of higher priority projects and tasks, including the Ontario Municipal Board Hearings on OPA 76. Staff worked on the Wildlife Strategy sporadically until late 2011. During this time, however, staff continued to meet with most of the members of the Working Group individually or in small groups to maintain communications and to continue to solicit opinions on the possible content. Staff returned part-time to the preparation of the Wildlife Strategy in November 2011. Staff

completed a draft report in May 2012 and provided it to the Working Group for review. A meeting of the Working Group was tentatively planned for June 2012 to discuss the draft report and to receive comments and suggestions. The meeting was postponed until September 2012 at the request of the Ottawa Carleton Wildlife Centre to allow a longer period of review. However, before the September meeting could occur, the Ottawa Carleton Wildlife Centre and the Ontario Wildlife Coalition publically resigned from the Working Group and released the draft report to the public, citing disagreement with the tone of the report, the recommendations and the process.

Following receipt of comments from the Working Group members in September 2012, staff proceeded with revisions to the draft Wildlife Strategy. The final draft of the Wildlife Strategy was released to the public by the City on April 29, 2013 for four weeks of review. Working Group members were given a final opportunity to submit comments and recommendations at meeting on May 14, 2013.

The September 2012 and May 2013 meetings of the Working Group were sparsely attended. Most members submitted their comments verbally or by e-mail.

The following members of the Working Group submitted written comments on the Wildlife Strategy, either in September 2012 or May 2013:

- Ottawa Carleton Wildlife Centre: September 2012 and May 2013.
- Ontario Wildlife Coalition/Animal Alliance of Canada: September 2012 and May 2013 (the latter submission was signed on behalf of the Animal Alliance of Canada).
- The Greenspace Alliance: May 2013.
- Ottawa Forest and Greenspace Advisory Committee: September 2012 (since disbanded).
- Environmental Advisory Committee: September 2012 (since disbanded).
- Ottawa Airport Authority: September 2012 and May 2013.

In addition, in his role as one of the group's rural representatives, Mr. Mussell facilitated the submission of comments from the following people and organizations:

- The Eastern Ontario Deer Advisory Committee, an *ad hoc* volunteer committee formed to provide advice to the Ministry of Natural Resources.
- Mr. Gerry Lee, former Chief of the Habitat Conservation Division of the Canadian Wildlife Service.

The Ottawa Forest and Greenspace Advisory Committee also facilitated a submission from the following person.

- Ms. Iola Price, former biologist with the Canadian Wildlife Service and former Chair of the Ottawa Forest and Greenspace Advisory Committee.

The written submissions by these groups and individuals are attached to this document as Appendix A.

The Wildlife Strategy strongly reflects the input of all Working Group members, whether they submitted their comments verbally or in writing.

## Informal Consultations

In addition to formal consultations, the City Project Manager had many informal discussions about the Wildlife Strategy and related topics with other City Departments, independent experts and stakeholders. These discussions included:

- The Emergency and Protective Services Department;
- The Environmental Services Department;
- The Public Works Department;
- Ottawa Public Health;
- Professional Wildlife Service Companies;
- The Rideau Valley Conservation Authority;
- Professional installers of beaver deceivers and beaver bafflers.
- Animal welfare and animal rights organizations;
- Representatives of the hunting and trapping communities.
- Professional wildlife biologists.

## Public Consultation

Formal public consultation on the Wildlife Strategy began on Monday, April 28, 2013 and continued to Friday, May 24, 2013. The City received original comments through the public website from 24 people. Opinions were expressed on approximately 30 different issues.

The opinions expressed by more than one person were:

- General opinion on draft Wildlife Strategy (where expressed): six positive, three negative.
- General opinion on proposed Wildlife Resource Officer (where expressed): seven positive, four negative.
- General opinion on proposed outreach and education: two positive, one negative.
- Revise strategy to include increased hunting on City/NCC property to manage wildlife populations: six.
- Recommendations regarding individual species: five.
- Revise strategy to end all trapping/lethal wildlife management by the City: four.
- More consultation needed with wildlife experts in implementation: four.

- Volunteering to serve as a wildlife expert: four.
- Risks of animal-borne diseases, especially Lyme Disease, are understated: three.
- Revise strategy to include more implementation measures: three.
- Revise strategy to include a greater focus on co-existence: two.
- Harvest wildlife to support food banks: two.
- Reduce urban expansion: two.
- Revise strategy to include a vision statement balancing wildlife policies against human needs and safety: two.
- More enforcement of by-laws and regulations against feeding wildlife: two.
- More enforcement of by-laws restricting free-roaming cats: two.

The table in Appendix B consolidates and summarizes the issues raised in the public comments. The main themes are addressed below in the staff response.

### Ontario Wildlife Coalition E-mail Campaign

In addition to original public submissions regarding the wildlife strategy, elected officials and staff received 1887 (as of June 3, 2013) largely identical e-mails from the web site of the Ontario Wildlife Coalition (OWC) – one of the two members of the Working Group to have resigned in September 2012. Each e-mail required a member of the public to enter a name and e-mail address on the OWC web form and to click on a “Send Letter Now!” button:

(<http://wildlifeontario.ca/campaigns/ottawawildlifestrategy/submitpagev4.php>). The generated e-mails do not include an address, so it is not possible to determine if the respondents reside within Ottawa.

The text of the e-mails and the information posted on the OWC website includes incorrect information regarding the development and content of the Wildlife Strategy, the public consultation process, and the City’s policies and practices (see staff responses). Based on the form and origin of the e-mails, their content, and their incorrect information, staff has considered them as part of the OWC submissions in the review and revision of the Wildlife Strategy.

### Staff Responses to Comments and Recommendations

Table 1 summarizes the comments and recommendations on the Wildlife Strategy by theme, and provides a staff response.

**Table 1. Public Comment Themes and Staff Responses**

Theme	Staff Response
<i>Areas of Agreement or Partial Agreement</i>	
The Wildlife Strategy should speak more to the qualifications of the Wildlife Resource Officer.	Agree. Additional discussion has been added regarding the qualifications of the proposed Wildlife Resource Officer.
The Wildlife Strategy should discuss the need for public and expert involvement in implementation.	Agree. Additional discussion regarding consultation and involvement of the public and experts has been added to section on the Wildlife Resource Officer.
The Wildlife Strategy should have a section describing the wildlife management requirements and responsibilities of the Ottawa Airport Authority.	Agree. A new section has been added.
The 2012 preliminary draft of the Wildlife Strategy had a negative tone, identifying urban wildlife as “nuisance” animals.	Partially agree. Although staff believes that the tone of the 2012 preliminary draft was consistent with an approach of co-existence, it did include some negative language. This language has been removed and replaced with language more consistent with the overall approach.
The City has understated the problems and risks to public property, health and safety posed by some wildlife species: e.g. agricultural damage, vehicle collisions, animal-transmitted diseases, etc....	Partially agree. The 2012 preliminary draft document did not provide adequate information on agricultural damage by wildlife.
The City has overstated the problems and risks to public property, health and safety posed by some wildlife species.	Partially agree. The 2012 preliminary draft document included a lengthy discussion of animal-transmitted diseases. Although the discussion made it clear that the real risks from these diseases is low, the length of the discussion may have inadvertently communicated a different message. This section has been shortened.
The Wildlife Strategy should include a discussion of the impact of domestic and feral cats on wildlife, and recommendations for their management.	Partially. Staff agrees that research shows an enormous impact of domestic and feral cats on the diversity and abundance of wildlife. The impacts of cats should be one of the subjects of the proposed public education and outreach programs.
<i>Areas of Disagreement</i>	
There has been inadequate public consultation on the Wildlife Strategy.	Disagree. The Working Group has met nine times, with abundant consultation between meetings. Staff has consulted widely with other experts and stakeholders. The Wildlife Strategy was

	available for public review and comment for one month, supported by a public service announcement and media coverage.
The Wildlife Strategy should not be going to the Agriculture and Rural Affairs Committee (ARAC).	Disagree. The City Clerk and Solicitor's Office has agreed with the Chairs of ARAC and Planning Committee that the Wildlife Strategy falls within the specific responsibilities of ARAC.
The Wildlife Strategy does not promote co-existence with wildlife.	Disagree. The approach and recommendations of the Wildlife Strategy promote co-existence through education and outreach, prevention of human wildlife conflicts, and peaceful resolution of human – wildlife conflicts.
The Wildlife Strategy should be delayed to allow further public consultation.	Disagree. The City has consulted extensively on the Wildlife Strategy. The issues are well-known and well-understood. The requests for delay and further consultations originate with organizations seeking to change specific recommendations in ways which the City cannot agree: <i>i.e.</i> where such changes would contradict the City's fundamental responsibilities.
The City should create a Wildlife Strategy Implementation Advisory Group.	Disagree. The Wildlife Strategy has been revised to say that the proposed Wildlife Resource Officer should develop a network of public resources and experts upon which to look for advice and support in implementation of the Wildlife Strategy. However, the suggestion of a Wildlife Strategy Implementation Advisory Group appears to be an attempt to re-open the discussions that divided the original Working Group.
The Wildlife Strategy will continue the killing of the majority of Ottawa's beavers.	Disagree. Ottawa has a population of several thousand beavers. In the past, Ottawa has trapped approximately 150 beavers a year for protection of infrastructure, property, and public safety. The recommendations in the Wildlife Strategy are expected to reduce that number.
The City plans to kill more coyotes.	Disagree. The Wildlife Strategy recommends an enhanced coyote

	<p>response procedure, which includes the investigation and assessment of reports of habituated individual coyotes by a qualified individual. The response would focus on work with the local community to remove any attractants such as human food sources, and to provide information on real risks and affective deterrence. In rare cases, the City expects that it may be necessary to remove particularly aggressive animals to protect public safety.</p>
<p>The development of the Wildlife Strategy and the content of final document have been high-jacked by special interests: e.g. wildlife rights activities, hunting and trapping advocates.</p>	<p>Disagree. The City has taken an evidence-based approach in the development of the Wildlife Strategy. Staff has given equal consideration to all submissions and stakeholders.</p>
<p>The City has understated the risk of Lyme Disease in Ottawa.</p>	<p>Disagree. Staff have based the discussion of Lyme Disease on the most current information and advice from Ottawa Public Health and monitoring information from Health Canada.</p>
<p>The City should begin active management of some wildlife species populations with/without the National Capital Commission and the Ministry of Natural Resources.</p>	<p>Disagree. Staff have not found nor received convincing evidence that management of any wildlife species populations is currently warranted in Ottawa. In addition, responsibility for management of wildlife populations rests with the Ministry of Natural Resources.</p> <p>Staff have noted that future discussions with the NCC and the MNR regarding deer populations and densities might be warranted, if the incidence of Lyme Disease were to increase significantly in Ottawa.</p>
<p>The City is incorrect to say that beaver deceivers and beaver bafflers cannot be used in engineered stormwater management ponds and municipal drains.</p>	<p>Disagree. In addition to the opinions of its own engineering staff – who have ultimate responsibility for the functioning of municipal infrastructure – staff have spoken with experts in beaver management, reviewed policies and approaches from other jurisdictions, and consulted academic and “grey” literature. Staff have found no evidence of beaver deceivers and beaver bafflers being used</p>



	in engineered stormwater ponds. The evidence, experts and literature strongly suggest that these devices are inconsistent with the operation of engineered stormwater ponds and many agricultural ditches/drains.
The City has designed its “beaver deceiver demonstration project” to fail, in order to justify continuation current trapping practices.	Disagree. Of the seven active beaver deceiver sites, five appear to be working as intended. One of those sites will require additional adjustments. Beavers have not yet returned to the remaining two sites following initial installation. Final adjustment cannot occur at those sites until the beavers return.
“Let’s Talk Science” is not an appropriate organization for partnership on the proposed primary school outreach program. It does not have the necessary expertise, and better partners are available.	Disagree. Staff recommend a partnership with Let’s Talk Science for five reasons: <ul style="list-style-type: none"> <li>• It has the required expertise. Let’s Talk Science volunteers deliver education programs on all areas of engineering and science, including general biology, environmental sciences and natural history. A current coordinator has direct experience in the development and delivery of educational materials on wildlife.</li> <li>• It has a broad volunteer base and large organizational capacity. This makes it both efficient and cost-effective.</li> <li>• It develops age-appropriate educational materials based on the approved school curriculum, making acceptance by schools and teachers more likely.</li> <li>• It is a non-partisan organization, focused solely on education.</li> </ul>
The proposed Wildlife Resource Officer is unnecessary and a waste of money.	Disagree. Staff believes that the Wildlife Resource Officer is necessary for the long-term sustainability of on-going wildlife management initiatives, especially the Large Wild Mammal Response Protocol and the Beaver Deceiver demonstration project. The position is also necessary for implementation of the recommendations for improvement of the City’s coyote

	<p>response and beaver management practices. Improvements to the City's beaver management practices are expected to produce substantial long-term savings on maintenance of road, trail and railway culverts. In addition, staff believes that consolidation, coordination and oversight by the Wildlife Resource Officer will allow more effective implementation of other programs and initiatives, such as goose management in City parks and stormwater facilities.</p>
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## **Appendix A**

## **Working Group Written Submissions**

## Wildlife Strategy – City of Ottawa – Report and Recommendations

### Response from the Ottawa-Carleton Wildlife Centre (OCWC) – September 2012

We are writing to let you know that the Ottawa-Carleton Wildlife Centre is resigning from the City's Wildlife Strategy Working Group and, for the reasons outlined below, the Centre does not endorse the Wildlife Strategy Report. We ask that our name be removed from the final document.

We regret this decision because we were instrumental in bringing the progressive Wildlife Strategy proposal forward to Council and in getting it approved. However, we are confident that Ottawa residents will support our decision when they see how little it changes the very negative climate for wildlife in Ottawa.

#### Summary:

The Ottawa-Carleton Wildlife Centre brought forward the request that the City of Ottawa develop a progressive Wildlife Strategy. It was done on behalf of Ottawa residents who were frustrated and embarrassed with the City's long-standing approach to wildlife that included shooting moose, trapping coyotes and beavers and gassing groundhogs in neighbourhood parks.

Pressure from community groups resulted in the following motion being passed by Ottawa City Council on February 24, 2010. The motion reads as follows:

***Therefore Be It Resolved** that staff be directed to develop a comprehensive and integrated wildlife strategy for the City of Ottawa – included in a biodiversity strategy (or like product), centred on wildlife-sensitive planning, with a focus on public education and awareness programs – and involve appropriate City departments, the National Capital Commission (NCC), the Ministry of Natural Resources (MNR), other relevant agencies and community stakeholder organizations in its development and implementation, including protocols to be required in conditions of plans of subdivision and site plans, and that said strategy go forward to a joint meeting of the Agriculture and Rural Affairs Committee and the Planning and Environment Committee for discussion.*

That was two and a half years ago. The Working Group met a total of seven times, from May 2010 to February 2011 but has **not** met in over a year and a half, in spite of the fact that the approved Terms of Reference specified meetings were to occur monthly.

Although the above motion directed that the Working Group be involved in the development and implementation of the Strategy, the report and its recommendations were seen for the first time just a few months ago, distributed late one Friday afternoon just before summer holidays. There was no consultation or discussion prior to its release. Perhaps it was understandable as to why the City would want to keep it under wraps (we learned that the Mayor's office was nervous it would be leaked to the media and the public) given the glaring discrepancies between the goals of the Wildlife Strategy and the negative outcomes proposed in this report.

The preamble in the report states “*Council's emphasis on an ecosystem approach reflected the desire to move past reactive policies and actions based on immediate concerns for particular species; it reflected a desire for proactive policies and actions that facilitate and foster a more harmonious relationship with all wildlife.*” There is a serious disconnect between this rhetoric and the report's recommendations listed below, showing nothing has changed in Ottawa:

- the on-going trapping and killing of beavers throughout the City
- the labelling of wildlife as “*nuisances*”
- the inclusion of lethal trapping or live trapping in combination with euthanasia as options for dealing with “*nuisance*” wildlife
- a large mammal response that remains secretive and unaccountable to the public
- demonstration projects to evaluate flow devices where there is no beaver, no water and no risk and, even if there were, the devices installed have been designed to fail
- education and outreach projects that will provide little benefit to the majority of Ottawa residents
- the recommendation for the hiring of a Wildlife Biologist at a cost of \$100,000 annually to support these questionable endeavours.

### **“Nuisance Wildlife”:**

The most jarring reference in the report is the term “*nuisance wildlife*”. Never once during the Working Group’s deliberations was such a negative and subjective term used. In fact, the approved Terms of Reference for the Wildlife Strategy reflect the Ottawa Forests and Greenspace Advisory Committee representative’s request that “*human-wildlife problems*” be replaced with “*human-wildlife interactions*”.

A letter from Mayor Watson, dated February 22, 2012, confirmed that the Wildlife Strategy “*will also follow the Terms of Reference in reflecting an approach to human-wildlife conflict that essentially promotes co-existence*”.

You can hardly promote co-existence if you label the majority of wildlife that the public interact with as “*nuisances*”. Twenty-five years ago, when that term was used by the City, people had the expectation that it was therefore the City’s responsibility to ‘*get rid of the nuisance*’. The OCWC has been at the fore in working to change that ill-informed and outdated attitude by giving people a better understanding and appreciation for wildlife, along with the tools to resolve wildlife conflicts themselves. This not only directly helps the public but takes the pressure off the City for time-consuming and costly negative responses that have to be continually repeated and that please no one.

A growing number of ‘Living with Wildlife’ programs have been established by cities across North America. Not one of the leading programs in cities like Portland or Vancouver label urban wildlife as “*nuisances*”.

So, just where has this archaic term come from within the City of Ottawa? If it didn’t come from the Working Group, then it must have come from City staff. Perhaps, as an accommodation to the alternative Wildlife Strategy that was submitted through the Rural Affairs Office and referred to as “*Your Basic Trappers’ Manifesto*” by staff. And, why wasn’t this alternative Wildlife Strategy given to the Wildlife Strategy Working Group for consideration?

### **The City’s Unwillingness to Work with the Community:**

The process that has been used or, more appropriately, abused with respect to the development of the Wildlife Strategy confirms what a growing number of Ottawa residents see as a concerning trend. That the City of Ottawa is unwilling and unable to work with the community. From a wildlife perspective, it will likely mean more needless deaths of animals as well as public frustration and controversy, with Ottawa continuing to be seen as the “*most wildlife unfriendly city in Canada*”.

## **OCWC Response to Proposed City of Ottawa Wildlife Strategy**

### **1. Council Direction -A Process Not Followed:**

As outlined in the report, on February 24, 2010, City Council directed staff to develop an integrated and comprehensive Wildlife Strategy. Among the specific elements of the direction:

*“To involve appropriate City departments, the National Capital Commission, the Ministry of Natural Resources, other relevant agencies and community stakeholder organizations in its (the Wildlife Strategy’s) development and implementation.”*

This direction has certainly not been followed. After a number of meetings, Terms of Reference were approved by a majority of the Working Group in November 2010. At meetings on January 25, 2011 and February 15, 2011 among other short-term work plan suggestions made by the Project Manager were recommendations for a number of Demonstration Projects. It was indicated that an interim report would be ready for presenting to the Planning Committee in late March 2011.

Although the Terms of Reference call for monthly meetings, the Working Group has not met since February 2011. Yet, the current report, issued a year and a half later, outlines demonstration projects and recommendations that are being seen for the very first time by the community stakeholder organizations on the Working Group. How can anyone possibly suggest that the Working Group has been involved in the *development and implementation* of a Wildlife Strategy? Community members have been cut out of the process, a process that has been taken over by City staff for purposes of maintaining the status quo.

### **2. Ecosystem Context of the Wildlife Strategy:**

The report states that *“Council’s emphasis on an ecosystem approach reflected a desire to move past reactive policies and actions based on immediate concerns for particular species; it reflected a desire for proactive policies and actions that facilitate and foster a more harmonious relationship with all wildlife”*.

Yet, the report’s recommendations, in labelling urban wildlife *“nuisances”*, continues to apply different values to different species. It is the antithesis to the ecosystem approach referred to above and reflects an ingrained, ill-informed and outdated attitude on the part of City of Ottawa staff.

### **3. Existing Planning Policies and By-laws with Respect to Wildlife:**

In responding to the City’s Environmental Impact Statement (EIS) Guidelines, the OCWC and the Ontario Wildlife Coalition identified the weakness in relying on MNR reference materials, specifically the Natural Heritage Reference Manual, in protecting mammals. The Manual primarily focuses on managing game species, not studying each species for their ecological contribution and not studying habitat and ecological needs of a broader range of mammalian species. It is increasingly recognized that non-rare species are as important as endangered species when it comes to promoting a healthy environment because they are the means for circulating genetic resources. Every species has a role to play and the loss of a species’ contribution inevitably leads to the loss of ecological function.

This recognition is reflected in the recent announcement by the Ontario government of a significant increase in the species to be included under Significant Wildlife Habitat protection. The City of Ottawa needs to plan accordingly, recognizing that there are many changes coming.

**Wildlife-Sensitive Planning:** The inclusion of wildlife-sensitive planning within the Wildlife Strategy was not just meant to apply to restrictive interpretations of land-use designations, prohibitions and protections. It was also meant to identify, in advance, anticipated human-wildlife interactions and potential conflicts so as to be able to mitigate them for the benefit of both wildlife and residents.

A simple example is the need to adopt landscaping plans in riparian areas to prevent or reduce beaver damage. Likewise, is the obvious need to wire wrap or protect vulnerable trees in these areas. The City, at one time, had policies in this regard. Whatever happened to them?

If, as stated in the report, the goal is “*to move past reactive policies and actions*” and adopt “*proactive policies and actions that facilitate a more harmonious relationship with all wildlife*”, then wildlife must be considered in all areas of decision making, i.e. transportation, storm water, waste management, public housing, etc. as the only cost-effective way to avoid problems and controversy.

In the Current Planning Practices for Wildlife document, the outline on Stormwater Management Facility Design does not even mention ‘*wildlife*’, other than the outdated reference to “*rodent grates can be used to prevent nesting*”. This is one area where proactive planning is essential and it is why progressive municipalities are adopting modern, non-lethal prevention approaches that also save taxpayers many thousands of dollars annually.

#### **4. Wildlife Construction Protocol:**

We ask why is the “*Minimizing Impacts to Wildlife During Construction through Design and Construction Best Management Practices*” been suddenly titled the “*Ottawa-Carleton Wildlife Centre Construction Protocol*”, as shown on Appendix B of the report? This document was not produced by our Centre. We first saw it when it was circulated by Nick Stow in November 2010 and it did not have the Centre’s name on it at that time.

The OCWC did not produce this document. Our name must be removed from the title. It is time that City staff take ownership of the document so that wildlife are finally afforded the very minimal protection offered by this Wildlife Construction Protocol and new homeowners can be assisted by sensible advice from the City.

The report indicates that “*the Ottawa-Carleton Wildlife Centre has not been able to identify the origin of the detailed construction protocol, and staff is unsure of its biological basis or feasibility*. This is contradicted by an email to Councillor Alex Cullen from Dennis Jacobs, Director, Planning, Environment & Infrastructure Policy (prepared by Christine Hartig) on November 12, 2004, in which it states “*The City has a Wildlife Protocol to guide the staging and approach to construction activities during site development. Background and guidance information is also provided to new homeowners on the importance of habitat maintenance along with suggested activities, “do’s and don’ts”, for new homeowners adjacent to our natural environment areas.*”

Furthermore, we received around that time a copy of material from Cynthia Levesque, a Program Manager in Environmental Management Planning, that included a report to a Committee of Council on August 13, 2001 from Deborah Irwin in Development Services reporting on the “*Effectiveness of the Wildlife Protection During Construction Protocol*”. It also references draft brochures having been prepared and a stakeholder group formed that included the Ottawa-Carleton Wildlife Centre, although the Centre never attended any meetings.

While the Centre did provide a number of recommendations to City staff when contacted after the Protocol was first approved by former Regional Council in August 2000, we did not see the current document until it was sent to us, as noted above, by Nick Stow. We submitted corrections at that time to some of the information as well as added suggestions with respect to the protocol on reuniting young.

**Recommendation #1 regarding the wildlife construction protocol:** Given that staff have modified the protocol to eliminate any attempt to reunite young immobile animals separated during construction (we do not disagree with this change based on the likelihood of there being little habitat left to support these animals), we recommend that every effort be made to pre-stress the area on several occasions, starting up to a week in advance, to allow animals to relocate their young. It is important to give young animals this chance given that the “service providers” now responsible for removal and relocation will almost certainly be taking these animals to the Humane Society for euthanasia.

**Recommendation #2 regarding the wildlife construction protocol:** We recommend the removal of the following statement: *“The most effective and long term approach to preventing human-wildlife conflicts involves manipulating the potential habitat to render it incapable of providing the factors of survival: food, water, cover and reproductive habitat.”* The literal interpretation of this statement would mean eliminating trees, shrubs and virtually all natural landscaping! It also contradicts the City’s Official Plan Annex 3 – Design - Current Planning Practices for Wildlife which was attached to the report that recommends *“preserving existing trees and hedgerows as windbreaks, as a source of shade, as provision of micro-habitat for wildlife, and as heritage features”*. So, we recommend the following statement to replace it: *“Homeowners can prevent conflicts while learning to live with and enjoy wildlife by taking some simple precautions. Wildlife are attracted to people’s properties by either a denning site or a food source. Removing these attractions by animal-proofing typical access points to a roof or soffit and protecting garden plants are the most effective long-term solutions to preventing human-wildlife conflicts”*.

## **5. Education and Outreach:**

The report correctly identifies the public’s growing dissatisfaction with the way the City *“considers wildlife in the planning process, manages wildlife on City properties, or prevents and resolves conflicts between wildlife and municipal infrastructure”*. This being the case, it is not enough to give people naturalist information about wildlife and send them to see turtles on the Mississippi River. It will do nothing to stem the public outcry when groundhogs are gassed in city parks or beavers are crushed to death in conibear traps in stormwater ponds.

This is not to say that providing positive information about wildlife and directing people to natural areas isn’t a good idea but the City’s own actions have to be consistent with this. The report’s suggestions on educational outreach encourages people to *“identify the winter tracks of fishers and otters in the woods and wetlands of the Marlborough Forest”*. Yet, when the OCWC and the Ontario Wildlife Coalition recommended that the City’s Environmental Impact Statement Guidelines include winter as one of the seasons required for site evaluation in the environmental assessment process, in that it is the most likely season to confirm mammal presence, it was rejected by the City.

The reference in the report to *“the public appetite for information is currently being filled by a number of sources, some of which offer distinctly contrasting opinions and advice”* is, unfortunately, correct. It is why the City should carefully consider where they direct people.

Calls to the City reflect that the public is primarily interested in effective and humane solutions for human-wildlife conflicts and help with injured or orphaned wildlife. Both the Ottawa Humane



Society and the Ottawa-Carleton Wildlife Centre provide consistent information on the prevention of human-wildlife conflicts and the humane treatment of wildlife in distress.

On the other hand, while the Ontario Ministry of Natural Resources website *'Living with Wildlife'* talks about prevention, i.e. *"trapping of beavers should only be considered as a last resort after beaver baffles, tree wrapping, etc."*, the **only** advice given over the telephone by the MNR is to trap and kill beavers. Further conflicting messages on the MNR website talk about *'living with wildlife'* while always ending with *"the public has the right to kill wildlife or hire someone to do it"*. The Centre receives dozens of calls each year from the public complaining about this inconsistency and looking for non-lethal solutions.

Similar complaints, in far greater numbers, are received from people about the Ministry's advice with respect to orphaned wildlife which is to *"leave the animal where it is and let nature take its course"*.

Thus, the report's suggestion that wildlife calls could be directed to agencies such as the MNR will only cause greater public frustration, something that Ottawa city councillors have conveyed in the past.

**City Website:** Suggestions for an expanded website are good ones, provided they focus on co-existence as opposed to the naïve labelling of wildlife 'good' or 'bad'. Also worthwhile is a proposed summary of the City's approach and practices with respect to wildlife planning and wildlife management around City property and infrastructure. There has been a long-standing need for greater honesty and transparency with respect to how the City handles wildlife matters.

We also support the suggestion that the website be expanded to include more information and the use of social media technology to promote natural areas, wildlife sightings, etc. but it should not be used as a deflection in terms of the City attending to its first responsibility in providing Ottawa residents the tools to co-exist with wildlife.

**Recommendation #3 regarding education and outreach:** The sample outline provided in the report for a City Wildlife Website starts with *"Eek! It's a wild animal. What should I do?"* If the goal of the strategy is to promote co-existence, then the website should not start with a negative, fear-mongering statement. The irony is that the sample website page ends with *"Tips for a junior naturalist"*, directing people to natural areas in the region. This conveys that wildlife you might find in a natural area are 'good' but those in your backyard are 'scary'. There are a number of naturalist organizations that people can join. The City's primary responsibility to taxpayers and the goal of the Wildlife Strategy should be to help people live in harmony with animals in their backyards and neighbourhoods.

**Urban Wildlife Speakers Series:** The ideas and issues that are outlined which could be addressed by a Speakers Series are good ones. We are concerned, however, that based on the experience of other municipalities, there may not be sufficient interest to warrant it. In Oakville, for example, although the community concern was quite high given the significant presence of coyotes and after a child had been bitten, there were very few people that attended the well-organized and publicized information session.

With twenty-five years of experience in community outreach, the OCWC has found that few people take advantage of information and prevention advice in advance of the problem or, at least, make the effort to attend an event on the issue. We have found that it is more productive to piggy-back on other events such as community association meetings as well as offer presentations to established groups and organizations.

**Primary School Education and Outreach:** Why does the report recommend partnering with *'Let's Talk Science'*, an organization whose focus is on science and engineering, to develop and deliver an educational kit on urban wildlife, something it would have little first-hand knowledge about, when there are already unique educational resources doing this work in the community?

The Ottawa-Carleton Wildlife Centre has been developing and delivering presentations and workshops on urban wildlife for grades JK to 8 in area schools for many years. The presentations provide youth with a knowledge and appreciation for typical urban species and the ways in which we can co-exist with these animals. Given increasing development in edge habitat, the Centre has expanded presentations to include species such as coyotes and beavers.

The Centre's presentations are popular for a number of reasons. They easily gain children's interest because they are based on the Centre's direct hands-on experience in having rehabilitated thousands of orphaned and injured wild mammals, comprising over 24 different species, and its experience in having responded to more than a 100,000 calls to the Centre's Human-Wildlife Conflict Hotline.

Teachers value the work the Centre does because, although there are kits available such as those from Project Wild on Backyard Wildlife, as well as other educational materials produced, teachers say they have neither the time nor the expertise to present the information as effectively as the Centre does. Exciting children about urban wildlife provides the Centre with the opportunity to introduce concepts about ecosystems and biodiversity in a meaningful way to younger audiences.

There is another excellent wildlife resource in the community. Michael Runtz, one of the country's most respected naturalists and natural history authors whose Carleton University on-line courses on wildlife are the most popular in Canada. He also writes a weekly column on local wildlife.

When the report's author, Nick Stow, sent an email asking our Centre to share its power point presentations, we responded that there was no one standard presentation and that it would be best to talk and work directly with our Education Coordinator. We never heard back from him.

It is telling that in spite of the above resources, the report recommends a partnership with an organization that has no expertise in wildlife. More concerning is that there are no *'Key Messages'* outlined for the development and delivery of the education program, although the Strategy's Terms of Reference indicated that there would be. This omission is not helped by the section of the report that immediately follows on *'Nuisance Wildlife'*. Is this outdated philosophy to be one of the *'key messages'* in the education outreach?

**Recommendation #4 regarding community education resources:** We urge the City to use the experienced and established wildlife education resources that already exist in the community. And, that the education and outreach program be developed using *'Key Messages'* that focus on building understanding and respect for all wildlife while providing the tools to resolve human-wildlife conflicts and promote co-existence.

**Recommendation #5 regarding community education outreach:** We recommend piloting a practical education outreach project for a community living next to a riparian area. It would involve producing materials (like those recommended in the construction protocol) to educate the community about beavers and to enlist their support to wrap vulnerable City trees while planting others that could serve as a future food source for the beavers that will invariably come from time to time. The OCWC coordinated such a project, with the involvement of the City's forestry department and the support of councillor Rick Chiarelli, for residents of Graham Creek in 2009, to the benefit of wildlife, the environment and homeowners. Other cities like Guelph Ontario are following suit.

## 6. Nuisance Wildlife

The arrogant and disdainful attitude displayed in this report towards the majority of wildlife that people interact with will do little to encourage co-existence. Labelling species a ‘nuisance’ and suggesting *“like a weed, a nuisance animal is simply an organism in the wrong place at the wrong time”* is a statement that hasn’t been heard in progressive discussions about co-existence in the last fifteen years. While the report states, *“conflicts with wildlife are easily preventable”*, it will be impossible to persuade homeowners to take these simple precautions when the City has so negatively categorized these species.

It is a sad reflection on humans that we are unable to develop a respect for species until we have driven them to the brink of extinction. Only then do we raise their status to one of importance. Perhaps it is because it is more convenient to deal with the lesser problem of a small number of threatened species rather than having to change our behaviour which has produced the problem in the first place. Unfortunately, this only sets the bar for an increasing number of species to be added to the list in the very near future. There is no better example that the futile effort being exerted with respect to saving the Blanding’s turtles in the South March Highlands. All the while, the City continues to encroach on wetlands and floodplains, trapping and killing beavers, and refusing to recognize that beavers are the single most important influence in maintaining wetlands, crucial to the survival of species such as the Blanding’s!

The report states that *“most urban animals have a primary den and several secondary dens sites, which they may use in response to a variety of circumstances”* and that *“exclusion of an animal from a primary den will normally result in its relocation to a secondary den”*. This comment relies too much on the marketing rationale put forward by commercial wildlife removal companies. Removing wildlife during the birthing season or excluding the adult from a den is responsible for the majority of the thousands of orphans that are left behind and have to be euthanized each year.

The reference in the report to the use of one-way doors by wildlife removal companies is another statement that the City needs to be very cautious about. The use of one-way doors during the birthing season is highly controversial in that it leaves immobile young in inaccessible attics and soffits to die an inhumane death or fall between walls leaving the homeowner with the serious consequences and cost of repairs.

Wildlife rehabilitators and animal protection agencies that are left to deal with the consequences of these actions, including the often costly impact on homeowners, should have been consulted to balance the information received from commercial wildlife removal companies.

**Recommendation #6 regarding “wildlife removal”:** The report lists lethal trapping or live trapping in combination with euthanasia as a service option for homeowners. However, companies listed in the Ottawa Yellow Pages Directory all prominently advertise *“humane”* wildlife removal. The OCWC can attest to the anger of members of the public who have been deceived in this regard, so it is something that the City needs to consider very carefully when advising the public through its Call Centre. The Ottawa Humane Society’s (OHS) *‘Questions to ask Wildlife Service Providers’*, is attached to the report as Appendix D, to be added to the City’s website. It certainly does not include lethal options. We recommend that there be a consistent approach taken by the City with that offered by the OHS in providing information to the public that is based on humane solutions to human-wildlife conflicts.

**Forestry Operations and Tree Removal:** It is very telling that this falls under ‘Nuisance Wildlife’. The statement in the report that *“Forestry Services does not trim or remove trees containing adult animals or nests/dens containing young animals”* is patently false. Dozens of trees

with occupied dreys (squirrels nests) were cut down in Andrew Haydon Park in March 2012. Many of these dreys would have contained newborn young. The OCWC asked the Forestry Department, in an email dated March 30<sup>th</sup>, for an explanation as to what would have happened to these young animals as well as why the policy was not upheld. It has never received a reply.

Policies should reflect what actually happens, not just what the City would like to have people believe happens. The public will not be fooled by policies when they are contradicted by what people can see with their own eyes. This kind of deception does little to enhance the Forestry Department's or the City's reputation.

**Recommendation #7 regarding forestry practices and wildlife: Ensure that the policies outlined with respect to wildlife and forestry operations are upheld and that contractors working for the City are both trained and held to account in this regard. An educational workshop for forestry staff and contractors is recommended.**

## **8. Large Wild Mammal Emergency Response**

The City's response to large mammals such as moose, deer and bear over the years, mostly through a lethal reaction, has proven very controversial.

The current response continues to lack transparency. In spite of numerous requests from the public and the Wildlife Strategy Working Group, the City's Wildlife Service Provider remains an anonymous figure. Surely, anyone hired by the City and paid for by public funds should be on the public record. And, if not, at the very least, the terms of reference for the position should be available to the public, as should published reports on outcomes with respect to the services provided.

The Wildlife Strategy report states that *"since implementation in 2010, it has proven effective at resolving most large wild mammal incidents without harm to the animals or significant public disturbance"*. But, how is the public to know, particularly when this statement is contradicted by anecdotal reports from time to time?

No other publicly-funded position would be permitted to operate in such secrecy, so why is this one?

The Large Wild Mammal Emergency Response is currently managed by By-law and Regulatory Services. The report recommends that this responsibility be transferred to a proposed new Wildlife Biologist Position stating, among other benefits, *"better monitoring and reporting of City wildlife management activities"*.

**Recommendation #8 regarding large wild mammal emergency response: Does the transfer of duties mean greater public accountability or simply the shifting of responsibility and secretive control from one City department to another? It is a reasonable question given the lack of participation and consultation with the Working Group tasked to develop the Wildlife Strategy. We urge full public transparency in the staffing and contracted duties associated with the Large Mammal Emergency Response.**

## **9. Beaver Management – Ottawa's Failed Approach**

The City's report outlines the significant benefits of beavers through *"the promotion of biodiversity, increases in ecosystem health and resilience, and provision of ecosystems services – especially through the creation and maintenance of wetlands"*, yet it fails to recommend making the minor adjustments needed to continue to draw on beavers' exceptional contributions.

Other cities are adopting mitigation measures such as wrapping trees and installing water flow devices but somehow, in Ottawa, taking these measures seems to be beyond City staff. The report attempts to rationalize why Ottawa must continue to trap and kill upwards of 134 beavers each year, stating that it is a small number considering the large number of culverts, drains and storm water facilities in the city. This begs the question as to why, if trapping is not required in the majority of these locations, what makes it necessary in the ones outlined in the report?

Although the report indicates the number of beavers trapped in municipal drains and stormwater facilities, it indicates the number of locations were not recorded. How can the City evaluate the effectiveness (or costs) of trapping over prevention solutions if it does not know the number of locations where trapping was carried out?

One Ontario municipality was told by an MNR representative that *“they promote trapping as a method of dealing with beaver-human conflicts and a licensed trapper MUST trap 75% of their annual quota or risk losing their license”*. Surely, the funding needs of trappers and the MNR should not trump humane, sustainable and more cost-effective solutions for municipalities.

There is a reference in the report with respect to storm water ponds that states *“beavers also damage or destroy neighbouring trees, which have often been planted by the City at the cost of many thousands of dollars”*. What responsible municipality would plant trees in a riparian area where beavers weren’t wanted without a landscaping plan that avoided trees which serve as the beavers’ primary food source, along with wrapping vulnerable trees? A decade ago, under the City Forester at the time, the late Craig Huff, Ottawa had a policy of protecting trees along riparian areas where beaver activity might occur. What ever happened to this policy?

**What the Experts Say:** The City’s report references a study in quoting *“where beaver deceivers may not be effective under some circumstances”*. The author of that study, Mike Callahan, in a letter to Nick Stow (page 17), challenges the City’s interpretation of the facts attributed to him from this study. The author, with many years of experience, has designed and installed over 850 successful flow devices for over 120 municipalities, as well as for government agencies, utilities, railroads, businesses and others. He has designed and installed more successful flow devices than anyone in North America and has recently assisted the City of Cornwall Ontario with managing a serious beaver problem endangering a large dike.

This individual has offered his services to assist the City of Ottawa at no charge because as he states, *“he enjoys giving back and sharing these effective technologies so others can benefit from them”*. Another organization that is working with municipalities in British Columbia also offered its free services to the City of Ottawa last Fall but was ignored.

Instead, the City of Ottawa has elected to hire and pay someone to install a number of flow devices as a demonstration project. Serious concerns about the sites chosen and the installations themselves are outlined in our response under Beaver Deceiver Demonstration Project (page12)

**Stormwater Facilities:** It is difficult to understand why the City of Ottawa continues to reject the views and experience of experts that water flow devices are suited to stormwater facilities. In his letter, Mr. Callahan identifies that flow devices can be designed so that the engineered water level and flow parameters are maintained despite the presence of beavers and that he has done this work countless times.

It is understood that stormwater ponds will seldom provide suitable long term habitat for beavers but beavers will move in from time to time if abutting wetlands and creeks are compromised. Thus, doesn’t it make sense to have an insurance policy by having installed a flow device to prevent

sudden flooding or to have wrapped trees in advance? Beavers can move in overnight, take down trees and establish a dam in very short order.

The City's report maintains that sudden events are unlikely because the "*Stormwater Management Section estimate that most facilities receive some form of inspection weekly and that problematic locations receive more frequent inspections during critical times of the year*". What an archaic and costly labour-intensive approach this is compared to properly designed flow devices that require next to no maintenance, actually making stormwater facility maintenance easier, saving time and money. The typical inspection required of these devices is a few times a year as compared to the weekly or more inspections the City now has to carry out.

**Public Opposition to Inhumane and Unsafe Lethal Practices:** It should be very clear by now that there will continue to be increased public opposition to the killing of beavers in our communities. This is particularly the case in stormwater infrastructure that is built around neighbourhoods and which people use for passive recreational purposes. It should not be surprising that people are appalled to think of animals struggling and dying in a conibear trap next to their recreational paths.

Furthermore, this doesn't even include the serious public safety concerns of using kill traps where our children and pets play. If, as the Mayor states, "*the City's first and foremost priority is to protect the public's health and safety*", then conibear traps have no place in an area frequented by people. It should be remembered that several family dogs suffered an agonizing death in conibear traps in recreational areas, one being a golf course, just outside of Ottawa a few years ago. Such risks are unacceptable when concerns about flooding can and are being addressed elsewhere by non-lethal means using flow devices.

**Municipal Drains:** Given the large number of beavers that the City kills in municipal drains, it is encouraging that it is reviewing its practices in attempting to balance the protection of wetlands with the obligations of the Drainage Act. Agriculture interests will also soon need to retain whatever water resources exist on the land to irrigate crops and water livestock given climate change and drought conditions. There are also the regular warnings of the Environmental Commissioner of Ontario that "*natural heritage features are being destroyed as farmlands are prepped for subdivisions and aggregate operations under the guise of 'normal farm practice'*"<sup>1</sup>

**Road and Rail Culverts:** Here too, given the large number of beavers that the City annually traps in road and rail culverts, it is important to look at progressive best practices being employed elsewhere. The Virginia Department of Transportation Study<sup>2</sup> demonstrates the effectiveness and significant cost savings associated with flow devices.

We would like to make a clarification to the report's comment that "*the cost of installing beaver deceivers at culverts is higher in the short-term than trapping. However, long-term costs are normally lower, and the potential for expensive structure damage to culverts and road/rail beds is reduced*". The cost savings are very much understated in this comment. As is often the case, it neglects to factor in the high cost of road crews and equipment needed to frequently dismantle beaver dams and unblock culverts. Trapping is always a very small portion of the cost, it is the significant regular maintenance costs, often buried in the Roads Department budget and the repair costs that make the alternative of using flow devices a bargain. The Virginia study noted above

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<sup>1</sup> Environmental Commissioner of Ontario Annual Report 2010/2011. "Masquerades as a "Normal Farm Practice": 4.1.2: pp. 57-58.

<sup>2</sup> Boyles, S.L. 2006. "Report on the Efficacy and Comparative Costs of Using Flow Devices to Resolve Conflicts with North American Beavers Along Roadways in the Coastal Plain of Virginia". Pp. 4-7.

shows that the cost of trapping, maintenance and road repair was ten times more than the one-time cost of installing flow devices at 14 beaver-conflict sites.

**Beaver Deceiver Demonstration Project:** Demonstration Projects were recommended by the Ottawa-Carleton Wildlife Centre at the outset of the Wildlife Strategy Working Group deliberations in 2010. In fact, Nick Stow suggested several beaver conflict sites that might be appropriate for such a demonstration. However, shortly after meeting at one of these sites, we were told that City staff had decided against installing a beaver deceiver, opting instead to continue trapping and killing beavers at this location.

An organization that has worked with other municipalities in installing flow devices offered its services free of charge during the controversy involving the Stittsville beavers in the Fall of 2011. It was ignored. Since then, there has been a great deal of secrecy on the part of the City in hiring a contractor to install a number of beaver deceivers. There was no discussion with members of the Working Group. This is not surprising given that the Group has not met in over a year and a half and the community groups represented have not been consulted on any of the specific recommendations in the Report.

We are extremely disappointed that the demonstration projects chosen are “*low-risk*” ones where beavers have not represented a serious problem and where the report proposes using one to three years to evaluate the results. How can you effectively evaluate their benefit? Also, how can you do a proper comparison with the alternative costs of trapping, labour-intensive maintenance and repairs?

We are even more concerned about the installations themselves. We warned last fall that Council should be very wary of flow devices that are ‘*designed to fail*’ or “*not be fully effective*”. The following concerns with the demonstration projects carried out to date by the City certainly underscore that warning:

**Figure 1. South March Highlands Demonstration Site:** Why were huge wooden posts used instead of the more typical and discreet small steel ones? We have visited this site and are shocked that the enclosures do not have bottoms, easily permitting beavers to dig underneath and block the culverts.



Figure 1. South March Highlands Demonstration Site



**Figure 2. Osgoode Trail Demonstration Site:** The cylindrical or tubular fencing used is very likely to fail given the debris that is already growing up through the middle of it. Experts installing flow devices in a wide variety of municipal installations say it is '*old technology*' that has a 30% failure rate. One expert said they haven't used this device in over 8 years, given its failure rate.



Figure 2. Osgoode Trail Demonstration Site



**Figure 3. Kitzell Pond Demonstration Site:** This has been installed since the report was distributed, hence we've added a photo below to our response. There are many obvious problems with this installation:

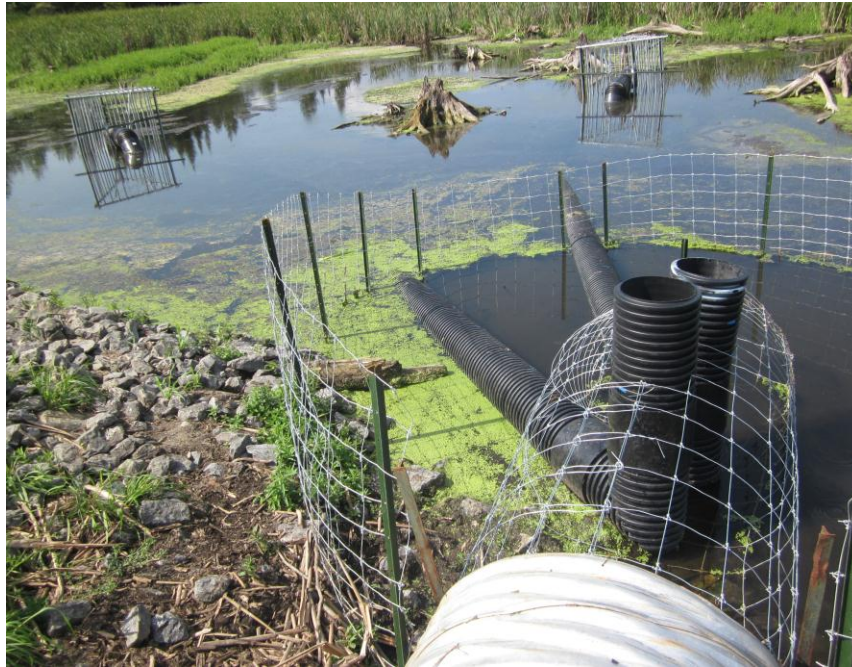


Figure 3. Kitzell Pond Demonstration Site.

- 1) The fencing is too lightweight. It appears to be only 9 gauge rather than the much stronger 6 gauge that is commonly used. The steel fence posts are further apart than recommended, making the entire fence flimsy. Since the goal is to have the beavers erect their dam on this fence, and given winter conditions of ice and snow, why was it not made to be sturdier?
- 2) There is no floor inside the fence, making it a high risk for beavers to tunnel underneath it;
- 3) The fence does not completely enclose the culvert. Once the beavers dam on the large fence and the water level begins to rise, the beavers can easily go up on land and get around the backside of the fence, allowing them to dam inside the fence right at the culvert;
- 4) The design and complexity of the piping is a real concern. The installed standpipes on the outflow ends of the pipes are higher than the top of the culvert. If these are indeed standpipes in the fashion of the Clemson Pond Leveler, then the beavers will be able to raise the water level above the top of the culvert, rendering the device ineffective. Also, if the water level were raised this high, the flimsy large fence is not going to hold up well to beaver damming of this height;
- 5) The cylindrical fencing installed on the culvert makes human maintenance access to the inlet of the culvert impossible. Keeping this type of cylindrical fence clean from floating debris is also very difficult;
- 6) The aesthetics of this flow device are atrocious. Even the beavers damming on the outside large fence will do nothing to hide all the metal and piping that has been installed inside the fence.

**Recommendation #9 regarding flow devices:** The report indicates that seven of these demonstration devices will be installed by the City. We recommend that no further taxdollars be spent on these installations via a sole source contract until the design flaws noted above in the three current installations be independently reviewed.

**A Properly Designed Flow Device:** The following culvert protector and flow device (beaver deceiver) was recently installed in Cornwall, Ontario and represents what a well-designed system should look like. Figure (A) shows the beaver deceiver piping and round fence as it was being installed. Figure (B) shows the culvert protector fence with the piping system leading to it, the latter now entirely underwater. These devices have been installed in hundreds of locations over the last number of years, they are successful and aesthetically pleasing. A similar piping system can be used for a beaver dam except, in that case, nothing shows, it is entirely natural looking.

**Figure A: Piping and round fence leading to culvert being installed**



**Figure B: Culvert fence with piping shown above now entirely underwater**



**Recommendation #10 regarding flow devices:** We recommend that a properly-designed flow device such as that described above be installed in a Stormwater Pond so that an evaluation of its effectiveness and cost-savings can be carried out; and that an education project be undertaken at this location so that residents have an understanding of beaver ecology and the options available with respect to stormwater management and prevention versus lethal control of beavers.

## 10. Coyotes:

The report outlines the important ecosystem function served by coyotes, as an apex species, in maintaining population control, particularly with respect to rodents. It identifies that there are few human-coyote conflict calls (10) annually received by the MNR, the declining rate of livestock predation by coyotes and the low risk to public safety from coyotes. It compares the few public complaints about coyotes to the 350-400 reported incidents of injuries to humans by domestic dogs in Ottawa annually.

Yet, the report recommends that *“the City of Ottawa’s direct response to individual, problem coyotes be expanded to include the assessment of animals exhibiting consistent signs of habituation, before they become an immediate risk to public safety”*. There is no problem with this providing that the assessment is based on information from experts on coyote behaviour and that the emphasis is on deterrents and education to resolve the problem. Otherwise, the City will be feeding into the mob mentality of renewed coyote-killing contests that earned this region such a negative image a few years ago.

## 11. Creation of a City Wildlife Biologist Position:

This position is first referenced as a ‘Species at Risk Biologist’ in the report. Section 7 of the report states that *“staff believes that due diligence by the City requires creation of a new position with formal responsibility for compliance with the ESA (see Recommendation #12, Creation of City Wildlife Biologist Position)”*.

A Species at Risk Biologist may be required within the Planning Department for the above reasons but the creation of this \$100,000 a year position cannot be justified through the back door of what is a very deficient Wildlife Strategy.

The report states that Council’s direction for a Wildlife Strategy was *“motivated not only by general concerns for biodiversity and harmony with nature, but by specific issues and complaints arising from the City’s current policies and procedures for dealing humanely with individual animals or populations of animals”*.

We can certainly attest to the above statement by virtue of the 100,000 calls received by the Centre’s Hotline over the years. None of these calls were about Species at Risk (SAR). In fact, the average resident will never see a SAR. Callers were seeking effective and humane advice about the typical urban wildlife found in their backyard.

However, given that these animals have been relegated to *“nuisance”* status in the report, it is impossible to believe that the proposed position will give much time to average Ottawa residents’ concerns with respect to wildlife. Nor, is it likely, based on the experience of community organizations like ours, that the person in the position will be willing to work with people in the community. The lack of consultation with the Working Group and the secrecy and control that City staff has exerted over the demonstration projects and recommendations in the report provide little confidence that this expenditure will benefit the public seeking humane and progressive help for wildlife.

**Recommendation #11 regarding the creation of a Wildlife Biologist Position: We recommend that the creation of this position be postponed until there is a Wildlife Strategy developed that demonstrates it is responsive to the wildlife concerns that the majority of Ottawa residents have expressed, so as to justify the expenditure of \$100,000 of taxpayer funds.**





# BEAVER SOLUTIONS

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August 4, 2012

Nicholas Stow, Ph. D., Senior Planner  
Land Use and Natural Systems  
City of Ottawa  
110 Laurier Avenue West, 4th floor  
Ottawa, Ontario  
K1P 1J1

Dear Dr. Snow,

I read with interest your recent letter to Dr. Heidi Perryman that she shared with me. I understand and support your important task of protecting public and private property from flooding damage. Preventing flooding damage to property and infrastructure is also a large focus of my business.

Over the past 14 years I have personally designed and installed over 850 successful flow devices for over 120 municipalities, as well as for government agencies, utilities, railroads, businesses and others. These flow devices are so successful I can guarantee they will prevent beaver-related flooding damage.

It is my hope that my beaver management experience can be helpful to you. I am also writing to you to clear up some misconceptions in your letter about flow devices.

First, your statement that flow devices “change the operational characteristics of stormwater management ponds” is not necessarily accurate. Flow devices can be designed so that the engineered water level and flow parameters are maintained despite the presence of beavers. I have done this myself countless times.

Second, when properly designed flow devices require almost no maintenance and often actually make stormwater facility maintenance easier, saving time and money.

Third, flow devices do nothing to “encourage” beavers to live in an area. Beavers are attracted by the habitat, not the presence of a flow device. If anything, by preventing beavers from raising water levels flow devices can shorten the length of time beavers will stay in the area, and discourage new beavers from relocating to the stormwater facility.

Fourth, the installation of proper flow devices when combined with tree protection can be an excellent proactive method to prevent beavers from relocating into stormwater facility habitats.

Both you and the city's stormwater engineers have extensive training and expertise for your jobs. Having designed and installed more successful flow devices than anyone in North America, I have experience and knowledge about beaver control that can complement your city's engineering experience and knowledge. Lending my beaver management expertise to the city's engineering expertise could make your job easier, while at the same time greatly benefiting the city and all its inhabitants.

I recently assisted the city of Cornwall with managing a serious beaver problem endangering a large dike. As a goodwill gesture I am willing to offer you and the City of Ottawa stormwater engineers my advice at no charge. I make this offer because I enjoy giving back and sharing these effective technologies so others can benefit from them.

By working collaboratively, it is possible for your beaver management in stormwater facilities to be more cost-effective, long-term, environmentally friendly and humane. Please consider contacting me to discuss your site specific needs and concerns at your earliest convenience. I look forward to hearing from you.

Sincerely,

Mike Callahan

*Michael Callahan, Owner  
Beaver Solutions LLC  
"Working With Nature"*

## Response from the Ottawa-Carleton Wildlife Centre (OCWC)

### City of Ottawa Draft Wildlife Strategy

May 23, 2013

The draft Wildlife Strategy posted for public comment on April 29, 2013 is almost identical to the earlier version circulated to the Wildlife Strategy Working Group members in June 2012.

While the current document has seen the language sanitized, removing terms such as ‘nuisance’ and adding a number of positive comments about wildlife, it cannot disguise the outcome for wildlife. The majority of beavers are still going to be killed in Ottawa, all the while the City continues to encroach on wetlands, transforming them into municipal ‘infrastructure’; a new recommendation opens the door for coyotes to be ‘removed’; and the few minor recommendations for education and outreach will have little overall impact on the community’s interface with wildlife.

The OCWC submitted a detailed 18-page response in September 2012 to the draft Strategy, expressing our serious concerns as a member of the Wildlife Strategy Working Group, providing background to these concerns as well as recommendations for improvements. Few, if any, of our recommendations were considered. This response is available for anyone interested at [http://www.animalalliance.ca/wp-content/uploads/2011/07/Wildlife-Strategy-Report-OCWC-Response\\_PDF.pdf](http://www.animalalliance.ca/wp-content/uploads/2011/07/Wildlife-Strategy-Report-OCWC-Response_PDF.pdf). We will, therefore, only touch briefly on the concerns and recommendations we registered previously in this response. First, however, are the newest concerns, only recently discovered:

**Council Motion Ignored:** There is grave concern about the inexplicable departure from the Council Motion below that approved the development of a Wildlife Strategy to one where **city-wide wildlife issues** have been handed over to the Agriculture and Rural Affairs Committee and where community stakeholder organizations were effectively cut out of the process as long as two years ago.

#### **February 24, 2010:**

*Therefore Be It Resolved that staff be directed to develop a comprehensive and integrated wildlife strategy for the City of Ottawa – included in a biodiversity strategy (or like product), centred on wildlife-sensitive planning, with a focus on public education and awareness programs – and involve appropriate City departments, the National Capital Commission (NCC), the Ministry of Natural Resources (MNR), other relevant agencies and community stakeholder organizations in its development and implementation, including protocols to be required in conditions of plans of subdivision and site plans, and that said strategy go forward to a joint meeting of the Agriculture and Rural Affairs Committee and the Planning and Environment Committee for discussion.*

**Unilateral Decision Made:** It appears that the Mayor’s office made the decision that the Agriculture and Rural Affairs Committee (ARAC) will be responsible for city-wide wildlife matters, even though the vast majority of human-wildlife conflicts occur in urban and suburban communities.

He indicates that the authority giving this responsibility to ARAC was approved by City Council in early 2011. There is, however, nothing in the terms of reference or in the discussion with councillors or recorded in council minutes to support that ARAC’s authority would encompass **general city-wide** wildlife responsibilities. It is, in fact, explicit in its terms of reference that ARAC will “*be responsible directly to Council for those items outside of the urban boundary*”.

Quite frankly, why would it be otherwise? It is entirely inappropriate that urban wildlife issues be determined by agricultural circumstances and the very different response to these circumstances in agricultural communities. Equally so, there would be a huge and rightful outcry were urban and suburban councillors to dictate a wildlife response for the agricultural community.

Furthermore, there has never been any suggestion, in the significant amount of correspondence, discussion or interim reports, that the Wildlife Strategy not go to both PEC and ARAC until a letter was received from the Mayor by the Ontario Wildlife Coalition on May 3, 2013. Even a letter from the Mayor on February 22, 2012 to community stakeholder organizations indicated that the report was nearing completion and once given to the Working Group for review and feedback, *“the goal is to present the report to the Environment Committee”*.

**Process Abused:** Community stakeholder organizations that participated in good faith in this exercise have been treated in a very shabby way. After a number of meetings, Terms of Reference (TOR) were approved by the majority of the Working Group on November 8, 2010, with only two opposed, the MNR and Agriculture representatives.

The Decision Making Process established at the outset called for *“Decisions to be made, wherever possible, on the basis of consensus, but if consensus is not achievable, then decisions will be made by simple majority vote. With respect to the content and recommendations of the Wildlife Strategy, minority opinions and recommendations will be noted in the strategy document and in the accompanying staff report for consideration and discussion by the committee”*.

We were shocked, therefore, to learn in the letter from the Mayor on May 3, 2013 that several (unnamed) *“members of the Working Group who had voted in favour of the TOR had retracted their support”* in early 2011. If these individuals had withdrawn their support after voting in favour of the TOR this should have been done at a meeting of the Working Group and not behind the scenes. This now explains why there were no further meetings of the Working Group, although community stakeholder organizations were led on for the next year and a half with explanations that things were only delayed due to staff work load.

The draft Wildlife Strategy released in June 2012 had not been seen by any of the community stakeholder organizations but clearly had been influenced by those on the Working Group who had obstructed the process from the beginning.

**Recommendation #1 regarding public participation:** The draft Wildlife Strategy be presented for consideration at a public consultation forum. This is essential in that community stakeholder organizations have had no meaningful input into the development of the draft Strategy. In that the City recently held a public meeting to allow for input by dog and cat breeders with respect to a proposed kennel bylaw, then the far larger number of citizens in Ottawa concerned about wildlife should be given the same opportunity.

**Recommendation #2 regarding reporting lines:** That the report and recommendations resulting from this consultation be taken to an Ad Hoc Committee made up of representatives from the three Standing Committees - Planning, Environment and Agriculture and Rural Affairs in that the Wildlife Strategy impacts all three areas. This would also uphold the intent of the Council motion that was approved for the Wildlife Strategy in 2010.

**Wildlife-Sensitive Planning:** The inclusion of wildlife-sensitive planning within the Strategy was not just meant to apply to interpretations of land-use designations, prohibitions and protections. It was also meant to identify any anticipated human-wildlife interactions and potential conflicts so as to be able to mitigate these for the benefit of both wildlife and residents. As such, wildlife need to be considered in all areas of decision making, i.e. transportation, stormwater, waste management, public housing, etc.

**Recommendation #3 implementing integrated wildlife-sensitive planning:** An example is the need to adopt landscaping plans in riparian areas to prevent or reduce beaver damage. Or, on the other hand, if the City were to adopt leading-edge ecological engineering practices with respect to water resources, it would be planting vegetation to encourage species such as beavers to build dams and slow floodwaters in our natural areas, reducing costs for grey infrastructure.

**Wildlife Construction Protocol:** A Wildlife Construction Protocol was approved by Ottawa-Carleton Regional Council in 2000. It was introduced by the OCWC based on complaints from people working in the construction industry about inhumane practices toward wildlife. One worker brought us the evidence of a baby porcupine that had been thrown into the fire pit along with other construction debris.

In spite of assurances over the past decade that the City of Ottawa had implemented a number of measures outlined in the Wildlife Construction Guideline, developed by the City following amalgamation, this was found to have been false. The Wildlife Strategy approved in 2010 was prompted by a construction employee that met with former councillor Alex Cullen to reinforce the need for a humane construction protocol based on what he was seeing within the industry.

**Recommendation #4 implementing a Wildlife Construction Protocol:** Thirteen years have passed and there has not been the will on the part of the City to get this done. The Guideline is as close to completion as it ever will be. It is time to stop making excuses and make this a priority. Besides the extensive development that is occurring, it is particularly needed given the number of Ash trees that will have to be removed over the next few years and the serious impact this will have on wild birds and mammals and their young.

**Education and Outreach:** The recommendations being put forward for the Education and Outreach segment of the draft are relatively positive but, frankly, it is inconsistent to be preaching co-existence to the public while the City continues to trap and kill beavers when there are more progressive solutions. Particularly when there is growing awareness on the part of the public about the significant value of wetlands and beavers. This contradiction leads to a rather schizophrenic report, on the one hand promoting co-existence and on the other using scientifically-unsupportable arguments for killing wildlife.

**City Website:** The recommendation for a wildlife section on the City website is very good. Unlike other cities such as Toronto, it is very hard to find information on wildlife in Ottawa, leading some to believe that it has been purposely hidden! Given that the majority of people will be seeking help for a human-wildlife conflict, it will be important to direct them to the abundance of existing information on how to prevent and/or resolve conflicts that is available in Ottawa on dedicated sites such as the OCWC [www.wildlifeinfo.ca](http://www.wildlifeinfo.ca) and the OHS <http://ottawahumane.ca/protection/wildlifeissues.cfm> .



**Urban Wildlife Speaker Series:** This is an excellent idea, particularly in addressing seasonable wildlife issues. Based on the outline provided in the draft Wildlife Strategy, the Key Messages are clear and consistent.

Providing regular information to residents through the banner on the City's main web page and through public service announcements would not only be helpful in itself but would begin to build a base of followers for the Speaker Series.

**Primary School Education and Outreach:** This is the one item under Education and Outreach that we find disturbing. The report recommends partnering with '*Let's Talk Science*', an organization whose focus is on science and engineering to develop and deliver an educational kit for primary schools on urban wildlife. It makes little sense that the City would elect to partner with an organization that has no first-hand experience with wildlife. Particularly, when there are established resources within the community that are delivering such programs.

The OCWC has been developing and delivering presentations and workshops on urban wildlife for grades JK to 8 in area schools for many years. The presentations provide youth with a knowledge and appreciation for typical urban species and the ways in which we can co-exist with these animals. Given increasing development in edge habitat, the Centre expanded presentations to included species such as coyotes and beavers a number of years ago.

There is another excellent wildlife resource in the community. Michael Runtz, one of the country's most respected naturalists and natural history authors, teaches at Carleton University. He also writes a weekly column on local wildlife and is well known in the community for his work in getting youth involved and excited about wildlife. Runtz has published a text book on Ontario's Natural History, something that could be readily adapted in support of educational materials for children of all ages.

When resources such as this are ignored in favour of an organization that has no expertise or experience with wildlife, it raises questions about the key messages to be delivered. And, whether this has been done as an 'accommodation' to those who put forward the 'alternative' Wildlife Strategy to the City which categorizes all urban wildlife as 'nuisance' animals.

**Recommendation #5 regarding community educational resources:** We urge the City to use the experienced and established wildlife education resources that already exist in the community. And, that the education and outreach program be developed using Key Messages that focus on building understanding and respect for **all** wildlife while providing the tools to resolve human-wildlife conflicts and promote co-existence.

**Beaver Management:** The City's outdated approach to trapping and killing beavers as opposed to the relatively easy and very cost-effective solutions to co-existing with this species will continue to receive criticism and ridicule. The draft Wildlife Strategy fails to provide any credible research or studies that support the staff assertions that beaver deceivers or water flow devices do not work. There are a number of studies that show water flow devices are both effective and many times more cost-efficient than trapping along with the hidden costs associated with staff monitoring, maintenance and road repair.

A two-part study that assessed the efficacy of both water flow control devices and trapping to control beaver problems at 482 conflict sites in New England or New York in 2003 and 2005 represents the largest-scale study to date in which both water flow control devices and trapping were utilized to mitigate

beaver problems and their success evaluated over a 7-year time span.<sup>1</sup> The studies found that flow devices demonstrated high success rates, minimal maintenance requirements, a relatively low cost, and that flow devices were applicable to the vast majority of problem sites.

**Stormwater Facilities:** While most of the facilities do not provide suitable long-term habitat, beavers will occasionally move in. We contend it makes better sense to install a flow device in these situations rather than on-going trapping. The argument against flow devices put forward in the draft Strategy is contested by Mike Callahan of Beaver Solutions who has written to the City to convey that flow devices can be designed so that the engineered water level and flow parameters are maintained despite the presence of beavers, indicating he has done so himself countless times. Surely, both from a cost perspective in having to monitor stormwater ponds on a weekly basis as well as the public safety risk in using conibear traps in places frequented by children and pets, the City should explore flow device technology with knowledgeable experts.

**Municipal Drains:** The steadfast opposition of the City to utilize flow devices in municipal drains is very much out of step with progressive thinking. The City contends that agriculture lands and the Drainage Act are incompatible with beaver-created ponds. The OCWC's response to the draft Strategy in June 2012 challenged this thinking, stating that agriculture will soon need to conserve water resources on the land to irrigate crops and water livestock given climate change and drought conditions.

A year later, you will be interested to learn that a Water Management and Wetlands Restoration course has been developed by the MNR, EC, Trent University and Ducks Unlimited <http://www.wmwrc.ca/>. It provides a basic introduction to land managers, municipal planners, drainage personnel, environmental consultants on the benefits of wetlands and the basics of protecting and/or restoring them. Some of the case studies from the course highlighted projects where conservation authorities were working with farmers to identify wetlands that could be preserved or reintroduced. Some of the tools include education regarding the benefits of wetlands to agriculture. One presentation showed how the Ontario Drainage Act could support these efforts, rather than, as the instructor mentioned, the common belief that the Drainage Act hinders efforts to protect wetlands. This reflects what is happening in many communities in the United States where beavers are being reintroduced to help restore wetlands to benefit agriculture.

Yet, in Ottawa, the city is unprepared to even acknowledge the vital role that beavers play in Provincially Significant Wetlands (PSW). There can be no better example of this failure than the recent decision by Council to permit the destruction of dams and the removal of beavers in the Upper Karl and Upper Dowdall municipal drains, all without any assessment to confirm the likelihood, as suggested by the Engineer's Reports, of Species at Risk in this PSW.

**Beaver Deceiver Demonstration Project:** The concern that the OCWC expressed in its response to the earlier draft Wildlife Strategy has been borne out. We indicated that it made no sense to choose low-risk sites if the City actually wanted to test the efficacy of flow devices. We also laid out a number of specific problems with the installations themselves.

Several of the demonstration projects were at rail and/or road culverts. We don't understand the point in using these as 'demonstration' projects. Just what would it demonstrate when the literature has long reported on the success of flow devices at such sites.

More concerning are the demonstration projects at the Bell Quarry and the Goulbourn Forced Road Kitzell Wetland. If anything, they demonstrate the risk in installing flow devices at low-risk sites, particularly if they are important wetlands. At the Bell Quarry, the pipe is too low to maintain sufficient

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<sup>1</sup> Solving Beaver Flooding Problems through the Use of Water Flow Control Devices, L.J. Simon in collaboration with Mike Callahan of Beaver Solutions, Inc. and the Association of Massachusetts Wetland Scientists, Published at Univ. of Calif., Davis. 2006.

water level for the beavers to dam at the fence constructed for this purpose. This has forced the beavers to go downstream to dam, thus defeating the purpose of the flow device. The Kitzell Wetland flow device has a similar problem in that the pipe is too low to maintain a sufficient water level for the beavers to dam at the constructed fence. The specifications for this installation noted that it was habitat for Blanding's and that a Blanding's turtle hibernaculum had been identified approximately 50 m from the culvert location. The installation of a flow device during the worst drought in years has likely compromised both the beavers and the Blanding's at this site.

Given the results to date, the demonstration projects are hardly a fair test of the need or the potential success of flow devices.

**Recommendation #6 regarding flow devices:** The City accept the offer of Beaver Solutions, a company experienced in municipal infrastructure flow-device technology to assist in evaluating, designing and installing flow devices at medium to high-risk sites in Ottawa where beavers have been regularly trapped as a demonstration project.

**Recommendation #7 regarding community education and flow devices:** The Poole Creek Demonstration Site underscores our previous recommendation for an education campaign directed at homeowners around such sites. Already, some people are complaining about tree loss due to beavers at the Poole Creek Site. To overcome this, we recommend a targeted education effort to let people know of the significant benefit of beavers to this creek, enlisting their support to wrap vulnerable trees while planting others that would serve as a future food source for beavers. The OCWC coordinated such a project for residents of Graham Creek in 2009, with the support of councillor Rick Chiarelli and the city's forestry department. It has resulted in strong stewardship support from residents. This is an essential part of our recommendation for flow devices anywhere in the City.

**Coyotes:** It is concerning that while the draft Strategy shows coyotes not to be a problem in Ottawa, it proposes a new policy of 'removing' habituated coyotes. Habituation is a subjective term, particularly when it has been used as the justification for the unscientific and irrational persecution of coyotes in Wards such as Osgoode in the past. An article in Ottawa Magazine (April 2013) does little to allay our concern. The councillor from that Ward is quoted as saying, "*many farms now have donkeys or llamas in with the sheep, goats, and calves and some farmers feel that these animals keep coyotes away*". Yet, in the same article he states "*For a lot of residents, coyotes are a problem. It's an everyday problem for a lot of people, and we need to do something about it*". This contradiction certainly creates the fear that killing will take precedence over prevention and education.

**Recommendation #8 regarding progressive approaches to coyote conflicts:** That Ottawa adopt the proactive 'Living with Coyotes' programs that places like Vancouver and Oakville Ontario have established. In the case of Oakville recently, a reported attack on a dog by a coyote was thoroughly investigated, in cooperation with the local humane society, where the installation of trail cams showed the dog was off leash and seen at the entrance of the coyote's den. This is the kind of investigation that must occur before it is decided that a coyote should be 'removed' because it poses a threat or is 'habituated'.

**Wildlife Biologist Position:** We are opposed to the creation of a Wildlife Biologist position that would report to the Agriculture and Rural Affairs Committee. Additionally, the cost of \$100,000 per year cannot be justified given the little impact this position will have in addressing urban wildlife concerns based on the direction and substance of the draft Wildlife Strategy at this time.



September 12, 2012.

Mayor Watson and Members of Council  
Ottawa City Hall,  
110 Laurier Avenue West,  
Ottawa, Ontario  
K1P 1J1

c.c. Mr. Nick Stowe

Dear Mayor and Members of Council,

I am writing as spokesperson of the Ontario Wildlife Coalition and a member of the Wildlife Strategy Working Group to let you know that we will not be supporting the report titled, "Wildlife Strategy – City of Ottawa: Report and Recommendations June 2012" (hereafter referred to as the Report) and request that our name not be attached to the document.

We are disappointed that City staff squandered an opportunity to develop a real wildlife sensitive planning strategy. At the onset of the Working Group process, we were hopeful that Ottawa would produce a model progressive human/wildlife interaction strategy. In fact, we travelled to Ottawa at our own expense to attend the meetings.

The first few pages of the Report sounded promising. The preamble states that "Council's emphasis on an ecosystem approach reflected the desire to move past reactive policies and actions based on immediate concerns for particular species; it reflected a desire for proactive policies and actions that facilitate and foster a more harmonious relationship with all wildlife."

However, the substance of the report shows little change in how the City will deal with human wildlife interactions.

We have set out our concerns in more detail below. Thank you for the opportunity to serve the City of Ottawa. We urge you to send the current document back and request staff to submit a new report that really "reflect[s] a desire for proactive policies and actions that facilitate and foster a more harmonious relationship with all wildlife".

Sincerely,

A handwritten signature in green ink, appearing to read "Liz White", is written over a faint, larger green outline of the same signature.

Liz White, Spokesperson.

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## **Summary of concerns :**

The *Wildlife Strategy – City of Ottawa: Report and Recommendations* was released to members of the Working Group in June 2012, 18 months after the last meeting of the Working Group. The Report talks about managing human wildlife interactions within the context the Biodiversity Strategy for the City, including “living in harmony with wildlife within both the rural and urban areas.”

## **Key concerns with the process:**

Eighteen months after the last meeting of the Working Group, members were presented with a draft report of the wildlife strategy. This was the first time members of the group were presented with the strategy and recommendations. Although we have a final meeting scheduled to discuss the Report, we have been told by staff that “if you are asking for substantial edits, additions, deletions, etc... then I would ask you to submit them to me as written comments and recommendations that could be included in a document to accompany the report to Council.”

We are deeply concerned with the content and the direction of the Report. We are provided very little time to discuss the Reports major flaws and agree on changes. In fact, any major concerns will accompany the Report to Council in a separate document. The Report in fact does not reflect what was decided at the Working Group. For example, we had a substantive discussion about how to refer to “human/wildlife conflicts” so as not to demonize wild animals with value-laden words. We decided that human/wildlife interactions provided neutral terminology. Yet the Report is laced with value-laden words like nuisance, aggressive, damaging and causing risk to human health and safety.

In addition, staff have attempt to suggest that traditional single species management as set out in sections 6, 8, 9, 10, and 11 of the Report constitutes wildlife sensitive planning centred on an ecosystem perspective. Sadly, this is not the case. It is our view that very little will change in how Ottawa manages its wildlife and controversial situations will continue to arise. If the Report is accepted by Council, beaver like Lucky, Lily and her kits will continue to be at risk of intervention by City staff.

Despite our concerns, we have taken the time to evaluate the report and outlined some of our key concerns with it in its current form.

## **Key concerns with the ecosystem approach:**

Section 2 of The Report addresses the ecosystem context of the wildlife strategy. The first paragraph of that section states, “Ottawa’s 2003 Environmental Strategy described the necessary components of a Biodiversity Strategy for the City. Along with goals for protection and restoration of natural spaces and habitats, it identified ‘living in harmony with wildlife within both the rural and urban areas.’ Specifically, it identified the need to develop ‘approaches for humans and wildlife...to live within the same places without conflict’.”

In addition, The Report states that the goal is “*to move past reactive policies and actions*” and adopt “*proactive policies and actions that facilitate a more harmonious relationship with all wildlife*”.

If the strategy which is set out in the Report was actually rooted in an ecosystem context, we would see a very different approach to wildlife. Instead, in the sections that define how the City approaches wildlife, we see the old controversial approaches to human wildlife interactions. Wild animals are labelled “nuisance”, blamed for being in the wrong place at the wrong time with an implied assumption that human actions have nothing to do with any conflicts that arise.

#### **Key concerns with the nuisance wildlife:**

- How does a government develop a strategy that assists its residents to live harmony with wildlife when it labels wildlife a “nuisance”?
- The language used in this section is negative and prejudicial, comparing wild animals to “weeds”, blaming them for causing property damage, over-running parks and referring to them as noisy and aggressive.
- The Report states, “In some situations, where the presence or actions of an animal pose a risk to public health or safety, the City’s service providers will use lethal trapping.” (pg 15 of the Report) This approach provides City staff with “an out” for virtually every circumstance where they decide that the animals must be lethally removed and does not even require them to provide evidence of the actual health or safety issues.
- The Report refers to lethal trapping as an option on private property, including during the birthing and nesting seasons. A service provider would be hired by the property owners to dispose of the animals. Currently the MNR does not license wildlife removal companies. The consequences of the actions of these entities includes the movement of adult animals well beyond the one kilometre release restriction, orphaning of young animals because the adult parents are trapped and removed from the area, inhumane deaths of animals trapped for extended periods of time in unmonitored cages and in some cases the cruel killing of these animals. The City should refer to the Ottawa Humane Society’s *Questions to ask wildlife service providers* which does not recommend lethal options.

#### **Key concerns with the Large Wild Mammal Emergency Response:**

- There is a lack of transparency in the City’s response to large wild mammal interactions, including the identity of the service provider, contents of the service provider’s contract, availability of reports where lethal action has been taken and statistics of the number of incidents where, as the City claims, were resolved without harm to the animals or significant public disturbance. The Report recommends the creation of a new position titled City Wildlife Biologist but does not recommend a transparent, accountable, non-lethal approach when these incidents occur.

### **Key concerns with beaver management**

- The statement in the Report about the benefits of beaver is quite good. It reads, “Overall the re-establishment of beavers is good for Ottawa. Ecological research has shown that beavers provide great benefits through the promotion of biodiversity, increases in ecosystem health and resilience, and provision of ecosystem services – especially in the creation of wetlands.” (The Report, pg 19) However, in the same paragraph, beaver are blamed for private property damage, loss of economically productive woodlots and agricultural lands and damage to municipal infrastructure.
- Despite their ecological importance, the Report goes on to say that private landowners have the right to dispose of beaver, including by lethal trapping and that City staff will not tolerate beavers in municipal drains and will have to act to protect roads, bridges and other municipal infrastructure. Other jurisdictions have developed best practice approaches to beaver management which does not include lethal management so why can't the City of Ottawa.
- The Report states that City engineers believe that the use of beaver deceiver devices could be a problem in engineered stormwater facilities and therefore the City will continue to trap beavers in those facilities.
- As with Lily and her kits at Paul Lindsay Park pond, the City will face ongoing public opposition to the lethal removal of beavers from stormwater ponds and other infrastructure facilities which have communities built around them.

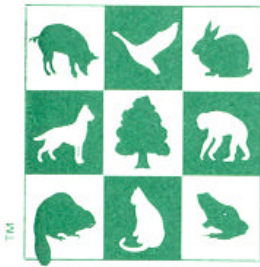
### **Key concerns with coyote management:**

- The Report recommends that “the City of Ottawa’s direct response to individual, problem coyotes be expanded to include the assessment of animals exhibiting consistent signs of habituation, before they become an immediate risk to public safety”. The recommendation seems reasonable except that once again, the City’s process is not transparent and accountable, the trapping service provider remains unknown, the contract not easily accessible to Ottawa residents.
- In a Freedom of Information request to the City regarding the trapping and killing of the Greenboro coyotes in 2010, we asked for the report from the contractor as was required by the contract. We were told that no report was required because the contractor did not bill the City for his work. In August of 2010, we sent an e-mail to Councillor Doug Thompson which read as follows, ‘Hi Doug, Sorry to bother you again but I wondered if you could do one final check for me to see if the person who dealt with the Greenboro coyotes has in fact submitted an invoice and his report as required by the contract. The last time we did this in June, no invoice or report had been submitted, despite the fact that the animals were dealt with in February.’ Six months after the coyotes were trapped and killed, no report was tabled by the contractor and therefore no written documentation as to what happened was available to Ottawa residents. Appendix A below is a letter sent to Mayor and Members of Council regarding the Greenboro coyotes.

**Key concerns with animal transmitted diseases:**

- Despite the fact that the document acknowledges that the Ottawa Public Health Department suggests that risks to the public from animal transmitted diseases, the report goes on to talk about all the diseases that humans might get from wildlife. While we understand the need to educate the public about disease recognition and prevention, disease fear mongering feeds into unnecessary fear and revulsion of wildlife and interferes with rational discussions about how to handle human/wildlife interactions. For example, only three animals in Ontario were found to have rabies in 2011 – a cow and two bats. Yet fear of rabies causes a public over-reaction to animals like skunks, raccoons, coyotes and foxes. We want people to respect and appreciate wildlife, not fear and loath them.





**Animal Alliance  
of Canada**



TO: Mayor and Members of Ottawa Council  
City of Ottawa

FROM: Liz White, Director  
Spokesperson, Ontario Wildlife Coalition

Barry MacKay, Canadian Representative  
Born Free  
Spokesperson, Ontario Wildlife Coalition

SUBJECT: Review of how the City of Ottawa handled the  
Greenboro Coyote situation – February 2010.

DATE: August 30, 2010.

Dear Mayor and Members of Ottawa City Council,

The purpose of this report is to demonstrate the need for a “comprehensive and integrated wildlife strategy for the City of Ottawa” and to ensure the decisions made about managing and killing wildlife be done in an open and transparent manner.

### **Recommendations:**

1. That Council reconfirm its support for a comprehensive and integrated wildlife strategy for the City of Ottawa, as per the motion that was passed by Council on February 24, 2010;
2. That Council integrate the large mammal committee and any other wildlife committees into the existing Working Group in recognition of the need for a comprehensive and integrated wildlife strategy;
3. That Council ensure an open, transparent and accountable Working Group process for the residents of Ottawa by reviewing the faulty process that occurred when the Greenboro coyotes were killed; and
4. That, where a human wildlife conflict arises, Council commit to resolving it through prevention and education and if intervention is required that it be non-lethal.

### **Background:**

In January 2010, controversy again erupted over coyote sightings in Greenboro, Osgoode and other communities.

The events involving the Greenboro coyotes highlight the serious problems with the City’s management of these issues.

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On February 1, the Ottawa Sun first reported the sighting of a coyote trotting past a playground in Greenboro. Residents reported that the tail and patches on the body of the animal had no hair. Residents speculated that this animal might be sick and therefore dangerous.

Even though, as the Ottawa Citizen reported “The coyote did not attack people or pets.” (Kate Jaimet, Feb 23, 2010) two coyotes from Greenboro would be killed 11 days later.

We now know that the City’s By-Law Services had already requested an authorization from the Ontario Ministry of Natural Resources to “hunt or trap” the coyotes in Greenboro and by February 2, the Authorization had been granted and the “trapper/wildlife specialist” hired.

We also know that, prior to hiring the trapper, By-law Services had no documentation to show that staff did any assessment of the condition of the coyotes prior to killing them, including seeking veterinary advice.

We also know that, although Ms. Hartig of By-Law Services claimed that the coyotes had sarcoptic mange with 60 to 90% hair loss, she had no documented basis for making such a statement, including a veterinary assessment.

We know that despite offers from rehabilitators in the community to take and treat the coyotes if they had mange, the City’s request was to “hunt or trap” the coyotes as the Authorization indicates. In a February 23, 2010 Ottawa Citizen article, Ms. Hartig, who apparently did not personally examine the animals and in any case is not a veterinarian, said that the [the Authorization] permit obtained did not allow for rehabilitation and the animals were too sick to cure.

However, Ms Hartig has no documentation to show that she as the By-law Services representative even asked the OMNR to include rehabilitation as an alternative approach. As the Access to Information indicates, “the request was made verbally, a few days before the authorization was provided on February 2, 2010.” And as mentioned above she also has no documentation to show that the coyotes were too sick to cure.

We now know that two Greenboro coyotes were captured and killed on February 11, 2010. One was captured in a Belisle Foot Snare and later killed. The other was shot. The trapper/wildlife specialist reported this to Scott Smithers, area biologist at the Kemptville District Office of the OMNR.

Despite this information, the City failed to inform Greenboro residents that the coyotes had been killed. On February 23, the Ottawa Citizen reported that Christine Hartig of By-law Services acknowledged that two Greenboro coyotes were killed. In the same article, she claimed both had been shot, even though one was trapped and one was shot and even though through the Access to Information Requests, By-law Services stated that no coyotes had been trapped.

She also stated that the coyotes were killed approximately one week before when in fact they were killed almost two weeks previously. In the same article, the Ottawa Citizen reporter made the point that the City did not make the coyote deaths public except under pressure from residents and the Citizen.

It is possible that the trapper/wildlife specialist simply called the OMNR and reported the coyote deaths, as he/she was required to do. It is possible that he/she simply failed to tell By-law Services that the coyotes were dead. However, although he/she must report to the OMNR as required through the Authorization, he/she signed a contract with the City.

In addition, By-law Services staff continued to dispense inaccurate information about how the coyotes were captured. Ms. Hartig has repeatedly stated that the animals were shot and that no traps were used. We know this statement is not true from the information acquired through Access to Information.

Ms. Hartig made a number of public statements about how the animals died. Yet no apparent correction came from the trapper or Scott Smithers who took the report from the trapper for the OMNR. In the end, despite the use of tax dollars to capture and kill these animals and despite intense public interest, the residents of Ottawa were not given information about the coyote deaths in a timely manner and were given incorrect information about how they were captured and killed.

In addition, we can find no documentary evidence that the City's intention was anything other than to capture and kill the Greenboro coyotes. Residents, community groups and rehabilitators who wanted the coyotes treated and re-released were simply ignored.

We find it hard to believe that, given the intense public interest in these animals, that By-law Services staff did not get some kind of report from the trapper or from the OMNR staff. It is hard to believe that By-law Services staff learned of their deaths almost a full two weeks after the animals were captured and killed.

Even more puzzling in this saga of the Greenboro coyotes is the claim that the trapper/wildlife specialist has yet to submit a bill to the City for catching and killing the coyotes and therefore has not provided the City with "a description of the service provided, the location at which the service was provided, the date, time and duration of the service, and any other information deemed relevant to the activity", as required by the contract.

### **Conclusions:**

We urge you to adopt our recommendations so that a transparent process is implemented to develop a comprehensive, integrated, humane and transparent strategy.

Sincerely,

Liz White



May 24, 2013.

Mayor Watson and Members of Council  
Ottawa City Hall,  
110 Laurier Avenue West,  
Ottawa, Ontario  
K1P 1J1

c.c. Mr. Nick Stowe

Dear Mayor and Members of Council,

I am writing as spokesperson of the Ontario Wildlife Coalition and Director of Animal Alliance of Canada to raise ongoing concerns with Ottawa's draft wildlife strategy titled "Ottawa Wildlife Strategy: Draft for Public Review and Comment"

On September 12, 2012, we provided detailed comments regarding the previous draft strategy, outlining our concerns and suggesting alternative non-lethal resolutions to human/wildlife conflicts (Appendix B). We were hopeful that our suggestions would be incorporated into this current draft. This does not appear to be the case except only in the most cosmetic sense. For example, the reference to "nuisance animals" has been removed.

The municipal consultation and reporting process is our overarching concern as we expressed in our May 13, 2013 letter (Appendix A). City Council passed a motion in February 2010 which called for the Wildlife Strategy to go to a joint meeting of the Planning and Environment Committee and Agriculture and Rural Affairs Committee.

It appears that the Mayor's office made a unilateral decision to send the draft strategy to the Agriculture and Rural Affairs Committee only, even though it is entirely inappropriate that urban wildlife issues be determined by agricultural interests, just as it is inappropriate for urban interests to dictate a wildlife response for the agricultural community.

We are also concerned with the content of the strategy. As one example, the strategy still allows for the trapping and killing of beaver and coyotes even though tried and true non-lethal alternatives exist.

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### **General Concerns about the draft strategy:**

First, the draft strategy doesn't disclose the true costs of trapping and other lethal management strategies versus prevention. For example, the Virginia Department of Transportation study (Report on the Efficacy and Comparative Costs of Using Flow Devices to Resolve Conflicts with North American Beavers along Roadways in the Coastal Plain of Virginia Department of Biology, Chemistry and Environmental Science 1 University Place, Newport News, VA 23606, Stephanie L. Boyles Wildlife Biologist May 10, 2006) shows that properly designed and installed water flow devices can save up to 80% of the cost of the trapping and related management costs.

It's not the trapper's costs, which are relatively small, but the costs that are hidden in the City's road and drainage department's budgets for the manpower to monitor sites frequently regularly unblock culverts and bring in heavy equipment for some jobs and the road repairs that are often required.

Second, the draft states that staff is unaware of any municipality that employs beaver deceivers in engineered storm water facilities yet companies like Beaver Solutions have installed flow devices in such facilities.

Third, the draft cites no scientific papers to back up staff assertions. It is impossible to believe that flow device technology is being increasingly used throughout North America and, yet, according to the City's engineers, none of these situations are similar to Ottawa's. How is Ottawa any different than any other community when it comes to storm water disposal?

Fourth, we work with other municipalities in Ontario and in Canada who are open to progressive solutions for living with wildlife. We find that Ottawa as the Nation's Capital is resistant to implementing non-lethal best practices and in seeking assistance from such progressive companies as Beaver Solutions.

Fifth, we are involved in public consultations in many communities and have come across few other cities that are so unwilling to engage with their citizens, as is Ottawa. Based on our experience on the Wildlife Strategy Working Group, where community stakeholders have been treated in such a shabby manner, it is not surprising that many residents are registering dissatisfaction about participation in civic life in Ottawa.

Therefore, the recommendations below deal both with the process issue and with the strategy content issues (Previous submission – Appendix B).

**Recommendations:**

The Ontario Wildlife Coalition recommends that Council:

1. Confirm the intent of the previous Council by tabling the draft strategy with the three Standing Committees - Planning, Environment and Agriculture and Rural Affairs since it impacts all three areas;
2. Hold a special public meeting with representation from all three standing committees to provide community organizations and citizens the opportunity to have proper input into the wildlife strategy approach;
3. Develop a prevention and non-lethal intervention wildlife strategy for the City of Ottawa as the overarching mandate of the Draft Wildlife Strategy;
4. Amend the Draft Wildlife Strategy to reflect a wildlife sensitive approach to planning and development, infrastructure maintenance and expansion, tree, park and green space management with the development and implementation of science-based non-lethal prevention and best management practices;
5. Adopt the recommendations outlined in our September 12<sup>th</sup> submission (Appendix B); and
6. Decide not to create a wildlife biologist position that would report to the Agriculture and Rural Affairs Committee.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Liz White', with a stylized, cursive script.

Liz White, Spokesperson.



## Appendix A



May 13, 2013

Mayor Watson and Members  
Ottawa City Council,  
Ottawa City Hall,  
110 Laurier Avenue West,  
Ottawa, ON K1P 1J1

Dear Mayor Watson and Members of Council,

1. We are astounded to learn that your office has decided that the lead for the Wildlife Strategy should be the Agriculture and Rural Affairs Committee, given that the majority of wildlife issues occur in urban and suburban communities.

- The City Council motion passed in February 2010 called for the Wildlife Strategy to go to a **joint** meeting of the Planning and Environment Committee and Agriculture and Rural Affairs Committee.
- The Council decision reflected the fact that the vast majority of wildlife issues are **urban/suburban** concerns.
- It would be entirely inappropriate that urban wildlife issues be determined by agricultural circumstances and the very different response to these circumstances in agricultural communities. Conversely, there would be a huge and rightful uproar were urban and suburban councillors to dictate a wildlife response for the agricultural community.

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2. You state that the ARAC mandate <http://ottawa.ca/en/city-hall/your-city-government/standing-committees/agriculture-and-rural-affairs-committee>, approved by City Council in early 2011, provides for this authority. This is incorrect. There is nothing in the above terms of reference nor in the discussion or council minutes to support that this authority would encompass **general city-wide** wildlife concerns. It is, in fact, explicit that ARAC will *"be responsible directly to Council for those items outside of the urban boundary"*.

Other communities in Ontario that have established progressive wildlife responses have done so through their Environmental Planning Department with personnel that range from a Senior Environmental Policy Analyst, Ecologist Planner, and Natural Environment Coordinator.

3. You suggest where there is the potential for overlapping jurisdiction, Committee Chairs can agree that one Committee can take carriage of the item, stating that this governance change was made in 2009. Even if this were the agreement, it would only make sense to have the committee responsible to the larger number of Ottawa residents directly affected by the issue take carriage of the item. Furthermore, there has never been any suggestion, in the significant amount of correspondence, discussion or the many draft reports, that the Wildlife Strategy not go to both PEC and ARAC until we received your most recent correspondence.

Your public statement on November 10, 2011 promised to accelerate the development of the Wildlife Strategy. Documents obtained by the Ontario Wildlife Coalition through Freedom of Information show that a briefing note sent to your staff on December 2, 2011 at 4:11 p.m. by the City Manager's Office, identified a detailed time schedule for the Wildlife Strategy to be reviewed by the Working Group and internal staff before being placed on the agendas of Environment Committee and Agriculture and Rural Affairs Committee.

However, less than an hour later at 5:04 p.m., your Senior Policy Advisor responded that he would like to talk further about this, saying "*there were some very reasonable input during the deluge and some balanced offers to help develop the strategy*". So, it appears that your office was responsible for the change in direction that resulted in no further meetings of the Working Group and a Wildlife Strategy that will now have the Agriculture and Rural Affairs Committee deciding on urban wildlife issues. We believe this decision is connected to a proposal submitted through the Rural Affairs Office by the Eastern Ontario Deer Advisory Committee, an advocacy group of hunting interests. The proposal, which has never been made public, is completely contradictory to the intent of the Wildlife Strategy in that it categorizes all urban wildlife as '*nuisances*' and subject to removal.

4. The vast majority of human-wildlife conflicts occur in urban-suburban communities. If a Wildlife Strategy is to be successful, it must place particular emphasis on wide-reaching as well as highly-targeted education and awareness programs in these areas. We agree that wildlife conflicts, such as the example you provide with respect to deer-vehicle collisions at the urban-rural boundary, need to be addressed. The most effective way to do this is through driver education, i.e. the City's Speeding Costs You Deerly campaign and greater commitment to including eco-passages when roads are widened or built by the City in and around the Greenbelt. The Ottawa-Carleton Wildlife Centre received calls last fall from the public who were concerned about the declining presence of electronic message boards in high deer crossing areas. At a recent public meeting held to consider widening roads through Stony Swamp, the Centre stressed that wildlife need to be factored into these discussions at the outset so that mitigation measures, such as eco-passages, are included.

As you state, there are likely many human-wildlife animal conflicts that go unreported. That is a good thing. In fact, it is the aim of organizations like the OCWC to provide people the tools through a detailed website and community presentations so they can resolve wildlife problems on their own, removing pressure on the public purse for doing so. Even councillor Doug Thompson, in the same article (Ottawa Magazine – April



2013) in which he identifies coyotes as a problem, relays that farmers tired of waiting for the city to take action have come up with their own solution "*many farms now have donkeys or llamas in with the sheep, goats, and calves*" to keep coyotes away.

5. With respect to the issue of consensus as to why the Wildlife Strategy failed, we have reviewed close to 75 e-mails and minutes of meeting exchanges between members of the Working Group. It becomes pretty clear that community stakeholders came to the table, as did Project Manager, Nick Stow, to develop an effective Wildlife Strategy as was outlined in the Council motion. There were others, however, whose intention was to protect the status quo. The pressure for the Wildlife Strategy came from the public in reaction to the controversial handling of wildlife response in Ottawa. From the earliest meetings of the Wildlife Strategy Working Group, the MNR representative challenged both the mandate and scope of the undertaking.

The chair of EAC had to remind its representative that she was there to represent EAC, not her own views. He sent a letter to the chair of PEC and senior staff indicating EAC's unanimous support for a comprehensive and integrated Wildlife Strategy and the goal "*to contribute to the protection of biodiversity and the welfare of wildlife in Ottawa through better land use planning, public education and public outreach*". He urged getting on with this in a timely manner, given that six months had already elapsed.

What we have now learned from your comments and what is particularly concerning is that the Decision Making Process noted below, established at the outset of discussions, was ignored in favour of behind-the-scenes decisions.

*Decisions should be made, wherever possible, on the basis of consensus but if consensus is not achievable, then decisions will be made by simple majority vote. With respect to the content and recommendations of the Wildlife Strategy, minority opinions and recommendations will be noted in the strategy document and in the accompanying staff report for consideration and discussion by the committee. (Wildlife Strategy Terms of Reference – August 30, 2010)*

The MNR and Agriculture representatives opposed the TOR during the vote on November 8, 2010 and this was duly recorded as a minority opinion. The TOR was passed by the majority of the Wildlife Strategy Working Group.

If, as stated, other members of the Working Group retracted their support after voting in favour of the TOR, this should have been done at a meeting of the Working Group and not behind the scenes. When we resigned we notified you and the Working Group, outlining our objections. If the Wildlife Strategy is to have any legitimacy, then the names and specific objections of these other members should be on the public record. This is particularly important since the Wildlife Strategy will almost certainly be back in the hands of the same inter-agency players that were the subject of the public criticism that prompted Council to appoint community stakeholders to the process in 2010.

6. To suggest that the resignation of the Ottawa-Carleton Wildlife Centre and the Ontario Wildlife Coalition illustrates why it was not possible for the Working Group to move forward on the basis of consensus is particularly troubling. Your own comments confirm that the City made the decision to disregard the Working Group and have staff take over the Strategy in February 2011. In fact, there had not been a meeting of the Wildlife Strategy Working Group in almost a year and a half when the draft Strategy was released in June 2012 nor had any of the community stakeholders even seen the draft. It had been put together by city staff and agency representatives some of whom had obstructed the process on the Working Group from the very beginning. What kind of dupes from the community would have remained involved in such a sham?

Further, a representative from the Eastern Ontario Deer Advisory Committee (EODAC) commented on a CFRA talk show recently that he was given a copy the draft strategy when it was first circulated to Working Group members on June 22, 2012. Why would this individual who was not a member of the Working Group be provided with a copy?

The same organization had already submitted an "alternative strategy" to the Rural Affairs Office which was never given to the sitting members of the working group. No explanation has ever been given as to why this document was not tabled at the Working Group and why there was a non-transparent, non-accountable parallel consultation occurring. This certainly raises very serious issues about the lack of transparency and accountability at the City of Ottawa but goes a great distance in explaining why the Agriculture and Rural Affairs Committee has become the lead on this issue.

We strongly urge you to make the City of Ottawa a leader in addressing urban wildlife issues by implementing a progressive, humane, non-lethal wildlife strategy.

Sincerely,



Donna DuBreuil  
Ottawa-Carleton Wildlife Centre



Liz White, Director, President,  
Animal Alliance of Canada



## Appendix B



September 12, 2012.

Mayor Watson and Members of Council  
Ottawa City Hall,  
110 Laurier Avenue West,  
Ottawa, Ontario  
K1P 1J1

c.c. Mr. Nick Stowe

Dear Mayor and Members of Council,

I am writing as spokesperson of the Ontario Wildlife Coalition and a member of the Wildlife Strategy Working Group to let you know that we will not be supporting the report titled, "Wildlife Strategy – City of Ottawa: Report and Recommendations June 2012" (hereafter referred to as the Report) and request that our name not be attached to the document.

We are disappointed that City staff squandered an opportunity to develop a real wildlife sensitive planning strategy. At the onset of the Working Group process, we were hopeful that Ottawa would produce a model progressive human/wildlife interaction strategy. In fact, we travelled to Ottawa at our own expense to attend the meetings.

The first few pages of the Report sounded promising. The preamble states that "Council's emphasis on an ecosystem approach reflected the desire to move past reactive policies and actions based on immediate concerns for particular species; it reflected a desire for proactive policies and actions that facilitate and foster a more harmonious relationship with all wildlife."

However, the substance of the report shows little change in how the City will deal with human wildlife interactions.

We have set out our concerns in more detail below. Thank you for the opportunity to serve the City of Ottawa. We urge you to send the current document back and request staff to submit a new report that really "reflect[s] a desire for proactive policies and actions that facilitate and foster a more harmonious relationship with all wildlife".

Sincerely,

A handwritten signature in blue ink, appearing to read "Liz White".

Liz White, Spokesperson.

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**Summary of concerns:**

The *Wildlife Strategy – City of Ottawa: Report and Recommendations* was released to members of the Working Group in June 2012, 18 months after the last meeting of the Working Group. The Report talks about managing human wildlife interactions within the context the Biodiversity Strategy for the City, including “living in harmony with wildlife within both the rural and urban areas.”

**Key concerns with the process:**

Eighteen months after the last meeting of the Working Group, members were presented with a draft report of the wildlife strategy. This was the first time members of the group were presented with the strategy and recommendations. Although we have a final meeting scheduled to discuss the Report, we have been told by staff that “if you are asking for substantial edits, additions, deletions, etc... then I would ask you to submit them to me as written comments and recommendations that could be included in a document to accompany the report to Council.”

We are deeply concerned with the content and the direction of the Report. We are provided very little time to discuss the Reports major flaws and agree on changes. In fact, any major concerns will accompany the Report to Council in a separate document. The Report in fact does not reflect what was decided at the Working Group. For example, we had a substantive discussion about how to refer to “human/wildlife conflicts” so as not to demonize wild animals with value-laden words. We decided that human/wildlife interactions provided neutral terminology. Yet the Report is laced with value-laden words like nuisance, aggressive, damaging and causing risk to human health and safety.

In addition, staff have attempt to suggest that traditional single species management as set out in sections 6, 8, 9, 10, and 11 of the Report constitutes wildlife sensitive planning centred on an ecosystem perspective. Sadly, this is not the case. It is our view that very little will change in how Ottawa manages its wildlife and controversial situations will continue to arise. If the Report is accepted by Council, beaver like Lucky, Lily and her kits will continue to be at risk of intervention by City staff.

Despite our concerns, we have taken the time to evaluate the report and outlined some of our key concerns with it in its current form.

**Key concerns with the ecosystem approach:**

Section 2 of The Report addresses the ecosystem context of the wildlife strategy. The first paragraph of that section states, “Ottawa’s 2003 Environmental Strategy described the necessary components of a Biodiversity Strategy for the City. Along with goals for protection and restoration of natural spaces and habitats, it identified ‘living in harmony with wildlife within both the rural and urban areas.’ Specifically, it identified the need to develop ‘approaches for humans and wildlife...to live within the same places without conflict’.”



In addition, The Report states that the goal is “*to move past reactive policies and actions*” and adopt “*proactive policies and actions that facilitate a more harmonious relationship with all wildlife*”.

If the strategy which is set out in the Report was actually rooted in an ecosystem context, we would see a very different approach to wildlife. Instead, in the sections that define how the City approaches wildlife, we see the old controversial approaches to human wildlife interactions. Wild animals are labelled “nuisance”, blamed for being in the wrong place at the wrong time with an implied assumption that human actions have nothing to do with any conflicts that arise.

**Key concerns with the nuisance wildlife:**

- How does a government develop a strategy that assists its residents to live harmony with wildlife when it labels wildlife a “nuisance”?
- The language used in this section is negative and prejudicial, comparing wild animals to “weeds”, blaming them for causing property damage, over-running parks and referring to them as noisy and aggressive.
- The Report states, “In some situations, where the presence or actions of an animal pose a risk to public health or safety, the City’s service providers will use lethal trapping.” (pg 15 of the Report) This approach provides City staff with “an out” for virtually every circumstance where they decide that the animals must be lethally removed and does not even require them to provide evidence of the actual health or safety issues.
- The Report refers to lethal trapping as an option on private property, including during the birthing and nesting seasons. A service provider would be hired by the property owners to dispose of the animals. Currently the MNR does not license wildlife removal companies. The consequences of the actions of these entities includes the movement of adult animals well beyond the one kilometre release restriction, orphaning of young animals because the adult parents are trapped and removed from the area, inhumane deaths of animals trapped for extended periods of time in unmonitored cages and in some cases the cruel killing of these animals. The City should refer to the Ottawa Humane Society’s *Questions to ask wildlife service providers* which does not recommend lethal options.

**Key concerns with the Large Wild Mammal Emergency Response:**

- There is a lack of transparency in the City’s response to large wild mammal interactions, including the identity of the service provider, contents of the service provider’s contract, availability of reports where lethal action has been taken and statistics of the number of incidents where, as the City claims, were resolved without harm to the animals or significant public disturbance. The Report recommends the creation of a new position titled City Wildlife Biologist but does not recommend a transparent, accountable, non-lethal approach when these incidents occur.

### **Key concerns with beaver management**

- The statement in the Report about the benefits of beaver is quite good. It reads, "Overall the re-establishment of beavers is good for Ottawa. Ecological research has shown that beavers provide great benefits through the promotion of biodiversity, increases in ecosystem health and resilience, and provision of ecosystem services – especially in the creation of wetlands." (The Report, pg 19) However, in the same paragraph, beaver are blamed for private property damage, loss of economically productive woodlots and agricultural lands and damage to municipal infrastructure.
- Despite their ecological importance, the Report goes on to say that private landowners have the right to dispose of beaver, including by lethal trapping and that City staff will not tolerate beavers in municipal drains and will have to act to protect roads, bridges and other municipal infrastructure. Other jurisdictions have developed best practice approaches to beaver management which does not include lethal management so why can't the City of Ottawa.
- The Report states that City engineers believe that the use of beaver deceiver devices could be a problem in engineered stormwater facilities and therefore the City will continue to trap beavers in those facilities.
- As with Lily and her kits at Paul Lindsay Park pond, the City will face ongoing public opposition to the lethal removal of beavers from stormwater ponds and other infrastructure facilities which have communities built around them.

### **Key concerns with coyote management:**

- The Report recommends that "the City of Ottawa's direct response to individual, problem coyotes be expanded to include the assessment of animals exhibiting consistent signs of habituation, before they become an immediate risk to public safety". The recommendation seems reasonable except that once again, the City's process is not transparent and accountable, the trapping service provider remains unknown, the contract not easily accessible to Ottawa residents.
- In a Freedom of Information request to the City regarding the trapping and killing of the Greenboro coyotes in 2010, we asked for the report from the contractor as was required by the contract. We were told that no report was required because the contractor did not bill the City for his work. In August of 2010, we sent an e-mail to Councillor Doug Thompson which read as follows, "Hi Doug, Sorry to bother you again but I wondered if you could do one final check for me to see if the person who dealt with the Greenboro coyotes has in fact submitted an invoice and his report as required by the contract. The last time we did this in June, no invoice or report had been submitted, despite the fact that the animals were dealt with in February." Six months after the coyotes were trapped and killed, no report was tabled by the contractor and therefore no written documentation as to what happened was available to Ottawa residents. Appendix A below is a letter sent to Mayor and Members of Council regarding the Greenboro coyotes.

**Key concerns with animal transmitted diseases:**

- Despite the fact that the document acknowledges that the Ottawa Public Health Department suggests that risks to the public from animal transmitted diseases, the report goes on to talk about all the diseases that humans might get from wildlife. While we understand the need to educate the public about disease recognition and prevention, disease fear mongering feeds into unnecessary fear and revulsion of wildlife and interferes with rational discussions about how to handle human/wildlife interactions. For example, only three animals in Ontario were found to have rabies in 2011 – a cow and two bats. Yet fear of rabies causes a public over-reaction to animals like skunks, raccoons, coyotes and foxes. We want people to respect and appreciate wildlife, not fear and loath them.



## Ontario Wildlife Coalition Form E-mail

Dear Mayor Watson and City Councillors

We are strongly opposed to the direction you are taking with respect to the City of Ottawa's Wildlife Strategy.

As Mayor, you have ignored the Council motion, approved in February 2010, that called for the Wildlife Strategy to go to a joint meeting of the Planning and Environment and Agriculture and Rural Affairs Committees for discussion.

Instead, you have handed it over to the Agriculture and Rural Affairs Committee (ARAC) whose chair, Councillor Doug Thompson's negative view of wildlife is well known. When Councillor Thompson wanted to get rid of coyotes in Osgoode he hired a trapper out of his office budget to kill them. He was quoted on CBC as supporting a coyote cull.

Mayor Watson, in a letter to community groups in February 2012, you indicated that the Wildlife Strategy will "reflect an approach to human-wildlife conflict that essentially promotes co-existence". The process that you have chosen shows that you have clearly broken this promise.

We are deeply disturbed that you are ignoring the views of 90% of Ottawa residents who, like our family, live in urban and suburban communities and want to see humane, non-lethal solutions to human-wildlife conflicts.

The Strategy that is going forward does not reflect this in that the majority of beavers are still going to be killed in Ottawa, all the while the City continues to encroach on important wetlands, transforming them into municipal 'infrastructure'; a new recommendation opens the door for coyotes to be 'removed'; and many of the other recommendations are simply window dressing that will have little positive impact on the community's interface with wildlife.

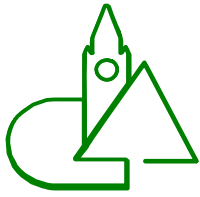
We are particularly concerned about the process you have chosen and what lies behind it. Why was the Wildlife Strategy Working Group abandoned in December 2011, without any further meetings held since then, although you had promised less than a month before to accelerate the Wildlife Strategy? It appears an 'alternative' Wildlife Strategy submitted by the Eastern Ontario Deer Advisory Committee, an advocacy group for hunting interests, received through the Rural Affairs Office, is behind your decision to discard the community stakeholders that had been appointed. We urge you to make public this 'alternative' Wildlife Strategy, one that is reported to categorize all urban wildlife as 'nuisances' and fair game for lethal removal, so we can understand what is behind your decision and what lies ahead in your plans to hand over what are primarily urban wildlife concerns to the Agriculture and Rural Affairs Committee.



We are very concerned about the major bias shown in this flawed reporting line and are opposed to the creation of a Wildlife Biologist position that would report to the Agriculture and Rural Affairs Committee at a cost of \$100,000 a year. It will do nothing to solve urban wildlife issues and is an unacceptable waste of our tax dollars that will continue to generate wide public criticism.

We urge you to get back to working with community stakeholders in implementing an accountable, transparent and progressive Wildlife Strategy that reflects the views of the majority of Ottawa residents and is befitting a metropolitan city and the nation's capital. Wildlife is the rightful concern of all members of the community as well as the councillors that represent us. As the 2014 election draws near, we will be watching closely to see where you, as Mayor, and our City Councillor stand on this matter.

Sincerely,



Greenspace Alliance of Canada's Capital

Alliance pour les espaces verts dans la capitale du Canada

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24 May 2013

*April 2013 City of Ottawa draft Wildlife Strategy*

### **Greenspace Alliance Response**

#### General

This Strategy is, on the whole, disappointing. First and foremost, it offers virtually no prospect of real assistance for residents who feel negatively affected by wildlife.

This failure to meet the concerns of ordinary residents is not unrelated to the failed process -- a 16-month hiatus -- that has led to the draft Strategy now before us. However, further finger pointing will not be productive and will only lead to more recriminations. In our view, the key to going forward is to try to reestablish a trust relationship between the parties and this can only be done if there is close communication between the City and the community stakeholders. At the same time, it is imperative that at the political level, the issue be broadened to go beyond the Agricultural and Rural Affairs Committee (ARAC) to include both the planning and environmental perspectives.

It also seems clear to us that what is being called for more precisely is a wildlife conflict reduction strategy. Within this context it is important to note that the needs and issues of farmers, other rural residents and urbanites may differ but efforts do need to be made wherever possible to seek common ground, while recognizing and accommodating differing interests.

#### The Wildlife Strategy Development Process

As a result of Council's decision on February 24, 2010 a Wildlife Strategy Working Group, composed of other government agencies and community stakeholders, began meeting in May 2010. A total of seven meetings were held until February 2011 at which time it was decided the staff chair would issue a draft strategy for review by WG members. In June 2012 a draft strategy was issued and was the subject of severe criticism, particular in its use of the term "nuisance wildlife" which ran completely counter to the objectives and underlying approach agreed to by the working group. In

September 2012 the Ottawa-Carleton Wildlife Centre issued a 16-page detailed report with recommendations and resigned from the Working Group as did the representative of the Animal Alliance of Canada/Ontario Wildlife Coalition. A further draft dated April 2013 was issued with the objectionable term removed but the content essentially the same as the previous draft.

During the hiatus, we do understand that the WG chair became busy with other issues, in particular with the Official Plan process. However, it has now also been revealed that during this period there was intervention in relation to the process by the Mayor's office that led to significant delays.

In addition, we strongly object to the referral of the draft Wildlife Strategy for review by the Agriculture and Rural Affairs Committee (ARAC) when it was the previous Council's intent that the Wildlife Strategy go to a joint meeting of the then Planning and Environment Committee and ARAC for review. It seems clear that Council saw this issue as a rural as well as an urban concern, particularly given the large number of calls received by the City from urban residents. Our concern is greatly heightened by the fact that ARAC's Chair is well known to have a negative view of wildlife.

We therefore call for the formation of an Ad Hoc Committee drawn from the Planning, Environment and ARA Standing Committees. This would conform to what Council (wisely) envisaged originally. How the Mayor and Council resolve this process issue will be an indication of the City's commitment to a progressive wildlife strategy.

### The Wildlife Strategy Content

The major critiques by the Ottawa-Carleton Wildlife Centre in their September 2012 response, are in our view, still applicable to the April 2013 draft; in particular, unchanged is:

- 1 the on-going trapping and killing of beavers throughout the City; the inclusion of lethal trapping or live trapping in combination with euthanasia as options for dealing with what was formerly referred to as "*nuisance*" wildlife;
- 1 a large-mammal response that remains secretive and unaccountable to the public;
- 1 demonstration projects to evaluate flow devices where there is no beaver, no water and no risk and, even if there were, the devices installed have been designed to fail;
- 1 education and outreach projects that will provide little benefit to the majority of Ottawa residents.

Where we do appear to differ is in relation to the hiring of a Wildlife Biologist. We support the creation of such a position, contingent on the establishment of a truly

consultative advisory committee composed of City staff and key community experts who will work together in the planning and implementation of the Strategy.

Missing from the Strategy is guidance on the conflict between cats and wildlife. A recent article in *Nature Communications* (Loss et al., 29 Jan 2013) documented the truly massive impact of free-roaming domestic, barn and feral cats on mortality of birds in particular. There are ways of mitigating each type of conflict and these should be part of the City's strategy.

#### Greenspace Alliance Recommendations

1. We are calling for the establishment of a Wildlife Strategy Implementation Advisory Group, with representation from the key City Departments (rural office, planning, operations etc.) and community stakeholders, particularly those with expertise and experience in the management of human/wildlife conflicts. Without such an opening up of the process the war of words will likely continue and probably intensify – a non-productive state of affairs. In our view, establishment of such an advisory group will be a key test of the City's willingness to engage the community in an open and transparent manner.

2. We conditionally support the creation of a Wildlife Biologist staff position, although its reporting to ARAC, given that most human/wildlife conflicts originate in the urban, not rural, areas does not appear logical. Given the nature and challenges of the work, it is imperative that the incumbent not only needs to have extensive knowledge of the field but also needs to be a focal point for public concerns regarding wildlife issues. The incumbent therefore needs to have strong negotiating skills, be an excellent communicator with the public and be able to work well with citizens' interest groups.

However, our support is contingent on the establishment of a Wildlife Strategy Implementation Advisory group as outlined in recommendation #1. Otherwise, we see little chance of improvement in the way the City handles human-wildlife conflicts.

3. The City should reconsider having an educational kit developed by the Let's Talk Science program at the universities. There are other, much more experienced, resources in the community, such as Michael Runtz, who could develop such a tool.

4. It is important that the City allow meaningful experimentation on flow devices for storm water, culverts and municipal drain installations. Experiments to date appear to have been designed to fail.

# **EAC Comments on June 2012 Draft Wildlife Strategy**

(Note: quotes from the City's June 2012 draft Wildlife Strategy are in italics)

## **Background:**

**City Council mandate** *On February 24, 2010, City Council directed staff to develop an integrated and comprehensive Wildlife Strategy. The specific elements of the direction, as established by Council's motion, were: To bring the wildlife strategy to a joint meeting of the Agriculture and Rural Affairs Committee (ARAC) and the Planning and Environment Committee (PEC) for discussion. To involve appropriate City departments, the National Capital Commission, the Ministry of Natural Resources, other relevant agencies and community stakeholders in its [the Wildlife Strategy's] development and implementation. To center the wildlife strategy on "wildlife-sensitive planning, with a focus on public education and awareness programs and to include protocols to be required in conditions of plans of subdivision and site plans.*

**Stakeholder involvement** A variety of stakeholders, including the Ottawa-Carleton Wildlife Centre, the Greenbelt Coalition, the Animal Alliance of Canada, MNR, NCC, representatives of builders, BOMA, the Ottawa International Airport Authority, a farmer/trapper, and representatives from two City advisory committees have been involved. The City's participation was led by a representative of the planning and growth management department with support from the Rural Affairs Office and Bylaw Services.

Initial efforts to develop a consensus framework/ work plan for the strategy bogged down because of apparent irreconcilable differences among the parties on several key issues. This resulted in a variety of divergent proposals on how to proceed and led to very long lapses between meetings. In mid-2012, in response to a public outcry to protect beavers in the western part of Ottawa, the Mayor announced that work would resume on the wildlife strategy. Subsequently, City staff released a draft final strategy that will be considered by the stakeholders at one last meeting on September 18. After that, the City will present its proposed wildlife strategy to Council either this fall or over the winter.

## **Issue (1): have stakeholders' groups had appropriate involvement in the development of the Wildlife Strategy?**

### **Ecosystem Context**

*Ottawa's 2003 Environmental Strategy described the necessary components of a Biodiversity Strategy for the City. Along with goals for protection and restoration of natural spaces and habitats, it included "living in harmony with wildlife within both the rural and urban areas". Specifically, it identified the need to develop "approaches for humans and wildlife... to live within the same places without conflict."*

*In early 2010, City Council directed staff to develop a Wildlife Strategy that would address these goals from an ecosystem perspective, "centered on wildlife-sensitive planning, with a focus on public education and outreach." Council's emphasis on an ecosystem approach reflected a desire to move past reactive policies and actions based on immediate concerns for particular species; it reflected a desire for proactive policies and actions that facilitate and foster a more harmonious relationship with all wildlife. Nonetheless, it must be recognized that Council's direction was motivated not only by general concerns for biodiversity and harmony with nature, but by specific issues and complaints arising from the City's current policies and procedures for dealing humanely with individual animals or populations of animals. Ottawa's Wildlife Strategy, therefore, should strive to reflect the full complexity of human relations with wild animals, from impacts of urban expansion on the integrity and connectivity of wildlife habitat, to the welfare of individual animals in conflict with human needs.*

## **Gap Analysis**

See the City's table on gaps in wildlife planning in Annex 1. Note that this analysis describes the gaps , and suggested remedial actions, in low-key, tentative tones. Clearly, some stakeholders will believe that it is imperative to close the gaps forthwith.

**Issue (2) : Given that : (a) the PPS related to natural heritage will likely be upgraded in the next few years (revisions begun in 2010); (b) a number of environmental/wildlife conservation groups believe that the City's Official Plan falls well short of fully encompassing the PPS precautionary principles regarding natural heritage; (c) the City lacks a current, comprehensive environmental plan (although an update has been pending for almost three years) which would help establish the relative importance of wildlife conservation, critical habitat protection, and the need for citizens to be less intrusive and ideally defer to wildlife unless immediate public safety concerns prevail (d) the Official Plan needs to, and will, be revised (and hopefully overhauled in areas dealing with natural heritage) in the next year; and (e) the proposed Wildlife Strategy would only apply in the urban area of Ottawa. Has the City found the optimal balance between public safety and wildlife/habitat protection.**

## **Wildlife Construction Protocol**

*In 2000, the Region of Ottawa – Carleton approved a Wildlife Construction Protocol for use during the review of development applications (Appendix A). This protocol provides a useful, overall approach to the mitigation of impacts on wildlife during construction, but is no longer consistent with the City of Ottawa's Official Plan policies and by-laws.*

*The Ottawa – Carleton Wildlife Centre has provided a construction protocol which it believes could provide the City and developers with more detailed and relevant suggestions on the mitigation of impacts to wildlife. Staff has modified the protocol slightly to better reflect the legal responsibilities and liabilities of the City (Appendix B).*

**Issue (3): Does the wildlife construction protocol encompass best industry practices in comparable Canadian municipalities. (large rural area, urban sprawl, nearby concentrations of wildlife, infringed wildlife habitat and shrinking corridors)**

## **Education and Outreach**

The draft report (pages 10-13) outlines a variety of means to improve public education and outreach. But:

**Issue (4): What are the core, and secondary, messages that would be broadcast? In the extreme, are these merely tepid, business-as-usual, get-out-of –the-way- pesky- critter, messages that reflect a mindset that almost suggests:**

**shoot first and ask questions later. Less rhetorically, what are the messages that would be transmitted in a more efficient way?**

### **Nuisance Wildlife: (pages 13-16)**

**Issue (5): Does this section state or imply that many human-wildlife interactions involve “nuisance” wildlife (presumption of expendability)?**

### **Species at Risk in Ottawa (pages 16-17)**

*Ottawa is a “hot spot” for species at risk, with as many as 52 species known or suspected to occur in the area as of January 2012. Of these, 29 species are protected as “threatened” or “endangered species” under the provincial Endangered Species Act, 2007 (ESA) and the policies of the Planning Act. Five additional migratory birds are protected as “threatened” species under the federal Species at Risk Act (SARA).*

*Under the Provincial Policy Statement, 2005 (PPS) and the City’s Official Plan (OP), development and site alteration are prohibited in “significant habitat for endangered and threatened species, as approved by the Ministry of Natural Resources.” The OP also requires that any development application for property within 120 m of significant habitat for endangered and threatened species be accompanied by an Environmental Impact Statement showing that the development will have “no negative impact” on that habitat. However, these protections only apply in the context of the municipal planning and development approval process. The City has no jurisdiction or responsibility outside of this process regarding species at risk or their habitat on private property. Furthermore, should a development proponent succeed in obtaining a permit from the Minister of Natural Resources under the ESA to remove habitat of an endangered and threatened species, then such a permit would also have the effect of removing protection of significant habitat under the PPS and the OP.*

*The City does have its own responsibilities for protection of species at risk and habitat for species at risk under the ESA and SARA as a landowner and a proponent of projects. These responsibilities most often arise in the context of municipal infrastructure projects, maintenance activities and operational activities. For example, regardless of any environmental assessment process, the City must obtain permits from the Minister of Natural Resources under the ESA for any infrastructure work that would damage or destroy habitat of an endangered or threatened species. Similarly, any maintenance work in or around water, such as the replacement of culverts or the repair of bridge crossings, has the potential to affect turtles, most of which enjoy some status under the ESA or SARA. Where provincial species at risk are an issue, the Ministry of Natural Resources can issue stop-work orders for projects proceeding without the necessary permits under the ESA, and the corporate penalty for contravention of the ESA can be as much as \$1,000,000 for each individual violation.*

*As with wildlife issues in general, the City does not have any staff with the formal responsibility or resources for ensuring compliance with the ESA. The situation is aggravated by the rapidity with which new species and their habitats gain protection under the Act. The Province reviews and updates its list of endangered and threatened species approximately twice per year, and new additions are frequent. Staff have taken it on themselves to track and update the City’s list of species at risk and to post that list to the City’s intranet. As time permits, they have also attempted to disseminate information on species at risk and compliance with the ESA. However, this ad hoc approach is not consistent or adequate, and the City has experienced several “near misses” with respect to the ESA, which have resulted in warning letters from the Ontario Ministry of Natural Resources.*

**Issue (6): Given that the Ontario ESA now has real teeth, and that the City of Ottawa appears to be playing catch-up on species at risk; is it enough that the City proposes to hire a Wildlife Biologist? Should there not be complementary**

**back-up such as via local stewardship, municipally funded, programs geared to protect and speak on behalf of humane wildlife protection. Similarly, surely the City can renew its funding for the O-C Wildlife Centre's educational, conservation, and wildlife advocacy work?**

### **Wildlife Response and Infrastructure (p.17 -27)**

I'll leave it to other members of EAC to provide detailed comments on most of this section, however, see the coyote (page 25) issue flagged below.

**Coyotes:** The City states:

*Based upon stable rates of human – coyote conflicts, the very low risk to public safety from coyotes, and the general ineffectiveness of coyote population management programs, significant changes to the City's approach to coyotes appear unnecessary. However, some minor changes do appear warranted. Continuing public concern about coyotes suggests that the City could do a better job of communication regarding the real risks, deterrence, and appropriate responses to animals on private property. The City's website should be updated and expanded to include more information on prevention of human – coyote conflicts, deterrence of coyotes, and details on how and where to seek assistance with habituated coyotes (see Recommendation 3). The City could present an annual public information meeting on coyotes, as part of an urban wildlife speaker series (see Recommendation 5). The City should develop and disseminate age-appropriate information on coyotes to primary schools, as part of a general outreach program on urban wildlife (see Recommendation 6).*

**Issue (7): see the Animal Alliance of Canada's position on coyotes - <http://www.animalalliance.ca/campaigns/human-wildlife-conflict.html# Coyotes> , which at least some members of EAC support, to consider whether we could endorse the Animal Alliance's position on coyotes.**

### **Animal Transmitted Diseases** (p. 27-31)

Perhaps Bill Pugsley has some observations on this subject.

### **City Wildlife Biologist Position** (p. 31-32)

Subject to approval by Council, the City proposes to create and staff this position see recommendation 11.

**Issue (8): is this the best response to the need for more expertise on municipal wildlife issues?**



## Annex 1 - Gap Analysis,

*Table 1: Gaps in Wildlife Planning Practices* **Area of Concern**

### *External Policy*

*Integration of the City's natural heritage planning with natural heritage planning by the National Capital Commission (NCC), the Ministry of Natural Resources, and the City of Gatineau.*

*Compliance with the provincial Endangered Species Act 2007, and provision of City input into regulations under the ESA 2007.*

*Clarity for agency staff, other stakeholders and the general public as to "who does what"*

### *Official Plan Policy*

*Implementation of PPS Section 2.1 (Natural Heritage) with respect to protection of habitat of threatened and endangered species and other significant wildlife habitat relies upon identification of such habitat by the City, which is difficult given the current state of information with respect to detailed land cover and other habitat attributes. Similarly, monitoring and reporting on trends in protection of such habitat is not currently possible.*

### **Suggested Actions**

*Continued consultation with the NCC, the Province and Gatineau on natural heritage system planning (e.g. Greenbelt Master Plan Review, Comprehensive Official Plan reviews).*

*Creation of a Species at Risk Biologist position or a Biologist position with responsibility for conformity with the ESA 2007. Addressed in the report recommendations.*

*Develop outreach and educational material with compendium of various roles and responsibilities of different levels of government/departments. Addressed in the attached Summary of Planning Practices and the report recommendations.*

*Expansion of the City's three-year cycle of aerial photography to include land cover classification and mapping. Monitoring and reporting on trends in habitat of endangered and threatened species and significant wildlife habitat, based upon the three-year cycle of land cover classification and mapping.*

*This suggested action is not addressed in the Wildlife Strategy Report recommendations, but is under study by the Planning and Growth Management Department.*

### **Implementing Authority**

*City of Ottawa  
NCC  
City of Gatineau  
Province of Ontario*

*City of Ottawa*

*All levels of government and relevant authorities*

*City of Ottawa (Planning and Growth Management/Infrastructure Services)*

<p><i>Subwatershed studies are usually submitted for approval to Committee and Council without accompanying recommendations for resources to implement natural heritage protection and stewardship measures.</i></p> <p><i>Implementation Mechanisms</i></p> <p><i>No regulation for grading and altering sites in City.</i></p>	<p><i>Submission of subwatershed studies for Committee and Council approval should be accompanied by a recommendation for a budget allocation to implement natural heritage protection and stewardship measures.</i></p> <p><i>Preparation of a Site Alteration By-law, as permitted in the Municipal Act.</i></p> <p><i>This suggested action is not included in the Wildlife Strategy Report recommendations, but is under study by the Planning and Growth Management Department.</i></p>	<p><i>City of Ottawa (Planning and Growth Management)</i></p> <p><i>City of Ottawa (Planning and Growth Management)</i></p>
<p><i>Parkland dedication through development does not typically include passive use or environmental lands.</i></p>	<p><i>Consider expanding parkland to include other forms of greenspace</i></p>	<p><i>City (Planning and Growth Management)</i></p>

## Annex 2: Recommendations in Draft Wildlife Strategy Report

### Construction Protocols

1. *That the Planning and Growth Management update the construction protocol of the former Region of Ottawa – Carleton to reflect the City of Ottawa Official Plan and by-laws, including consideration of elements from the construction protocol provided by the Ottawa – Carleton Wildlife Centre, and bring the construction protocol to Planning Committee and Council for approval in the first quarter of 2013.*
2. *That Planning and Growth Management incorporate the updated and approved construction protocol in the review of development applications and conditions of approval for plans of subdivisions and site plans.*

### Public Education and Outreach

3. *That the wildlife section on the City's website be expanded and revised to provide detailed information on common urban wildlife species, best practices for prevention of human – wildlife conflicts, and options for resolution of human – wildlife conflicts.*
4. *That the City's website should also be expanded to include more information on the City's natural areas and outdoor recreational opportunities, making use of "wiki" technology or other social media technology to provide for an interactive public forum.*
5. *That the City initiate a one year trial of an Urban Wildlife Speaker Series, consisting of four evening presentations over the course of 2012 – 2013 (autumn, winter, early spring, early summer).*
6. *That the City approach Let's Talk Science at the University of Ottawa and Carleton University to partner on the development and delivery of an educational kit for primary schools on urban wildlife.*

### Managing Conflict

7. *That the City evaluates the potential effectiveness of beaver deceivers, beginning with the demonstration project currently underway.*
8. *That the Municipal Drainage Section consider the results of the evaluation in identifying opportunities for the use of beaver deceivers at suitable locations on new municipal drains, or where Municipal Drain reports are being revised, especially in conjunction with the protection of wetlands.*
9. *That the Public Works Department consider the results of the evaluation in its maintenance program for road and railway culverts.*

### Coyotes

10. *Staff recommends that the City of Ottawa's direct response to individual, problem coyotes be expanded to include the assessment of animals exhibiting consistent signs of habituation, before they become an immediate risk to public safety.*

### Staff Wildlife Expertise

11. *Staff recommends that the City create a Wildlife Biologist position within Planning and Growth Management or Environmental Services (see report for duties).*

## ANNEX C – Comments by Other EAC members

Mike:

Here are a few suggestions:

1/ The title should be "Urban Wildlife Strategy - City of Ottawa" - I didn't view this as being related to Rural issues - there were so many suggestions only related to the urban residents. (for example urban speakers)

2/ A very very useful resource to residents would be an online map of where the various incidence with wildlife occur. Manotick has a live online map of where there are deer car accidents. A similar more comprehensive live map run by the City of Ottawa would be invaluable. Knowing where bears are - where there are deer hot spots on roads, etc. would be invaluable.

3/ I didn't see "Chronic Wasting" being listed as one of the infectious diseases that needed to be tracked. With the increased use of Biosolids the danger from prions can be enhanced.

4/ I saw no mention of road management and wildlife. I have to work hard some summers to avoid turtles on roads. The City hasn't addressed the impact of roads on natural animal pathways.

5/ Areas near water have serious problems with Muskrats (chewing up water craft) - they aren't mentioned.

G. Bruce Collier, Ph.D.

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Mike

- I am happy with your draft comments/submission but would add a bit about climate change and its impacts on animal health through the spread of diseases from the warming that should be clear to anyone in Ottawa over the last decade (remember the ice storm in 98? or the number of daily maxima over 30 C this past summer- a record but just a sample of what is coming)

- here are my comments on pages 27-31 re animal health (see clipped below)

- essentially the report plays down any impact

- I'd see mention of climate change and its impact on diseases that can and would affect both wildlife animals and humans

- health impacts from climate change happens to be a large and rising issue by WHO and the UN globally and we can see elements of that here as I'm sure Patrick would confirm from DFAIT

Cheers

Bill

Page 30

Ref

"Ottawa lies near the northern edge of the range for blacklegged ticks. The shorter summer and colder winter may limit tick populations to a level at which the bacterium cannot easily spread. However, historical data shows Ottawa's winters becoming milder, which could lead to more favourable conditions for ticks. In that case, Lyme disease could become more common. Monitoring of Lyme disease by Ottawa Public Health should continue. Any consistent upward trend in cases of Lyme disease should prompt a re-evaluation of the local risks.

...If the incidence of Lyme disease were to climb significantly in the future, then the City may want to consider recommending that the Ontario Ministry of Natural Resources and the National Capital Commission manage deer populations for an upper limit of 7.5 animals/km<sup>2</sup> through yearly adjustments to hunting quotas or other methods."

\*\*a stronger recommendation calling for a more detailed health impact assessment in light of the accelerating climate change that we see now and in the immediate future is called for- such as a scenario where for temp increase of say 5 Deg C in 20 years the incidence of lyme disease would be X and the necessary actions would be Y (adjust the deer kill for ex)

=====

Ref

"Ottawa Public Health has not recorded a case of West Nile Virus since 2006.

At present, West Nile Virus does not pose a significant health risk in Ottawa. The City's current approach to monitoring and control appears sufficient and effective."

\*\*West Nile has reappeared this summer with at least two cases documented by Public Health in Ottawa this past summer- not noted in this report. It like Lyme disease can be attributed to northward spread of mosquitoes carrying the virus and therefore a proactive recommendation is called for similar to the Lyme disease approach above i.e. scenario impact assessment and actions required. Both imply the Public Health needs to budget for these climate change impacts rather than delegate them away or ignore them. It also must be noted that the increase of either Lyme disease or West Nile implies a threat to human health as well

## **Ottawa Forest and Greenspace Advisory Committee - BH**

### **Wildlife Strategy Policy Document**

Introduction - I like the approach, that is focuses mainly on the ecosystem needs of species

Legislative – for non-municipal, perhaps remind readers that wildlife crosses these arbitrary human boundaries all the time

For Municipal – can it include planning guidelines such as tree planting, building lighting design, property standards, stormwater mgt plans, road maintenance, energy consumption, and pollutants

PPS also gives powers to protect habitat in indirect ways which benefit wildlife. Protection of PSW, groundwater, ANSIs, etc

Table 1 – please include Drainage Act, Nutrient Management Act, and related authority (OMAFRA)(although I do see it in the appendix, it is a very ecologically damaging act)

2.4.5 – why is it a range? Can our goal just be simply a minimum of 20% or higher? Why cut it off at a certain amount?

Section 3.2 – please include general residential and agricultural, and basically all land use, not just those considered to be ‘natural’ to some extent.

Section 4.7 – please include site grading and landscaping, plus the general layout of the development

Section 4 – Zoning bylaw – please clarify difference between the ability of zoning bylaws to prohibit land uses, but at the same time not be able to preserve natural environment – they appear to be contradicting statements

Section on EIS – the proponent is to demonstrate “No negative impact” but then it says in the next paragraph that the proponent must identify methods to minimize impacts. Minimize is not the same as no impact. Please include the reasons behind allowing impacts to occur and under what circumstances.

### **Appendix D**

Is this the real Design Principles from the Official Plan? They need updating

The design objectives should be rephrased from “where possible and appropriate” to “unless it can be demonstrated that there is no alternative” to put the own-ness on the designer to incorporate natural features.

For landscaping, and planting of public and private areas, it could be added that the landscape should be planned for lower maintenance requirements (thus use of energy and products).

For stormwater control – there are many more options

## **Wildlife Strategy Report**

When referring to the PPS, my understanding is that Cities are allowed to develop OPs with more protective policies for environment etc. The PPS provides a minimum standard.

On that note, the balance does not have to come at the loss of one thing over another. The example that economics and natural areas are at odds is misleading, seeing as natural areas are an extremely long term sustainable economic benefit.

The report 's opening section seems to define wildlife as only existing in "natural areas" and doesn't take into account things like bats, bees, deer, coyotes, mice, rabbits, birds, that live in our urban areas.

I'm not sure what paragraph 3 on page 7 is trying to get at. That natural heritage systems within areas not designated for protection as a "NEA" or something similar basically are automatically slated for development of the entire site? Perhaps remove as the next paragraph says all that needs to be said. of course remove "Nevertheless" if you do so.

Another Concern for Table 1 – lack of bylaws or mechanisms for the harmonious existence of wildlife within urban areas

Page 16, in the first three paragraphs - change "should consult" to "may not do so without a permit and must first seek approval from the MNR".

Top of page 20 – how are beavers causing health issues for humans? I can understand safety

Municipal Drains – goals for use of beaver deceivers as the first method looked at, with trapping as secondary? If we know it can be more cost effective, it would be worthwhile to consider it first, particularly in areas where beavers recur. Beaver deceivers are a proven technique, more evaluation is not needed as per the recommendations.

I would remove the sentence about the effectiveness of beaver deceiver being not so good in the past as there are confounding reasons why they may not have worked. It doesn't add anything plus you explain in the next sentence that there are improvements so this implies what is said in the former sentence.

Coyotes are also shown to have a stabilizing effect on prey populations and have a positive effect on diversity (richness and evenness)

Please include public education for coyotes

West Nile Virus – please put into context, as the number of serious illnesses and deaths seems to not warrant control by use of Bt. If people do not want west nile, they should be responsible for their own protection and the City should not be dumping Bt into water. Please recommend that the City reviews the 'effectiveness' of the use of Bt.

Should urban wildlife includes feral cats? I am not sure of the statistics but cats can also transmit serious diseases to humans.

Overall, I feel that the approaches are well- justified



## Ottawa Forest and Greenspace Advisory Committee - IP

### Comments on the draft wildlife Strategy

Books and documents I would recommend for inclusion in the document and/or reference/reading by Nick Stow include

- Bird, David. 1986. City Critters: How to Live with Urban Wildlife. Eden Press. ISBN 092079256 (available from ABE Books – various prices) Lola Price has a copy and recommends it as a general, user-friendly guide for real people.
- Bennet, D., and T. Tiner. 2004. Wild city: A Guide to nature in Urban Ontario, from Termites to Coyotes. M&S Toronto. 344 pp. ISBN 0-7710-8569-9. A user-friendly guide to a wide variety of wildlife species – more on the informal side of life but with useful and valid information..
- Canadian Cooperative Wildlife Health Centre. 1995. Health Risks to Wildlife Personnel: Hazards from Disease-causing Agents. 55 pages + appendices (should be on the shelf of the wildlife biologist if hired. Has info on zoonoses, some of which could be inserted into this wildlife strategy. Copy available from Lola Price
- Greifenhagen, S., and T.L. Noland. 2003. A Synopsis of Known and Potential Diseases and Parasites Associated with Climate Change. Forest Research Information Paper No. 154. 147 pp + Appendices. Ontario Forest Research Institute, OMNR, Sault Ste Marie. ISBN 0-7794-4727-1; ISSN 0319-9118.

### General comments

It would be useful if he treated bees and wasps and maybe ants because as the climate warms, we will have more southern species moving north. And generally, more insect pests, some of which eat our plants, others smell bad or bite us.

Page 1 - Up front, more general information on how to deal with wildlife issues. The planning strategy is good but the need to deal with wildlife goes beyond planning to on-the-ground advice (which he gets to in his recommendation for a targeted wildlife biologist). That person, imho, should be a mammalogist with a broad range of habitat experience and knowledge of birds, insects, wildlife diseases etc. and a knowledge of how to deal with the Ottawa medical system.

The document does not stress enough the fact that deer and coyotes and racoons and other medium to large mammals move into urban habitats to take advantage of a new and sometimes delicious and abundant food source in the form of nice grass, shrubs and gardens. Too often we hear the cry about us destroying wildlife habitat (which does occur) but some species bound back with a vengeance.\

Section 3 – page 7 – the changes to the Canadian Environmental Assessment Act may require changes to para 2.

In the next paragraph, it should not be true that an EIS is unlikely to result in the cancellation of a project (but sadly, the comment in the document is true).

Page 9 – table – regulation for grading and alteration – when will the city finally release whatever study it is doing on this issue? And, when will the city move beyond “consider[ing] expanding parkland to include other forms of greenspace

Section 4 – Wildlife Construction Protocol – There are retired biologists and land managers from the Canadian Wildlife Service, OMNR, the NCC and private organizations who would help by

reviewing the draft construction protocol if asked nicely I think. That resource is sitting unexploited.

Section 5 – Education and Outreach – It is nice to go to talk to schools but takes a lot of effort and teachers are busy and not always wanting to have their limited classroom time taken up by outsiders (notwithstanding the science outreach at U of O. It takes a special kind of person to relate to school children – graduate students are not necessarily that kind of person. Nick is right to say the Ottawa Website could be improved. A dedicated and trained wildlife person who would answer calls and talk to people is also needed. Sometimes all it takes is someone to listen, offer comment and/or advice and the wildlife problem disappears. It may be a question of identifying something by a telephone description to solve the problem or initiate a higher level of response. Nick should mention that.

His idea for a speaker series is good but I expect interest would fall off with time. He might be advised to tie in with the Ottawa Field-Naturalists Club. They tap into local expertise.

Otherwise, his recommendations are good.

#### Section 6 Nuisance Wildlife

Again, someone on the city end of a telephone could answer many questions and allay fears or initiate the appropriate response.

Page 16 – he should indicate which acts are federal and which are provincial (esp re ESAs)

Section 7 Species at Risk – this and other sections relating to buildings should make mention of the Ontario Heritage Act and the city's heritage planners. If a building is to be altered or proposed for demolition and it has a chimney that might house Chimney Swifts, then provisions of the ESA kick in, in concert with the OHA (which, incidentally, contains provisions for the protection of natural heritage – something not mentioned in the document at all).

Section 9 – Beaver Management. I would suggest that further examples of beaver deceiver be researched. Stonington ME had one installed in what was originally a private storm-water management pond that gradually became more marsh-like. I have photos of the construction phase. Looks a lot nicer than the city ones shown. Each beaver deceiver must be site-specific in its design – there is no one-size fits all so favoured by our city engineers.

Section 11 Animal Transmitted diseases – I would recommend information be included on Tularemia *Francisella tularensis* - there are two subspecies, each one in different groups of animals. Cottontail rabbits, aquatic rodents and other terrestrial species can carry the disease. It is transmitted by biting insects and ticks. Not a fun thing to get. Also the hospitals in Ottawa don't know much about rabies and bat bites (I speak from personal experience).

On page 29, Insert the scientific name of the Black-legged Tick – is it *Ixodes scapularis*? Also mention that small mammals, especially Deer Mice *Peromyscus* spp. and birds are the host for the Black-legged Tick in the tick's immature stages (I don't know if it can transmit *Borrelia* at this stage but it would be worth adding that info if it does). I heard on the radio that Ottawa Public Health seems now to have accepted that the Black-legged Tick is in the Ottawa area (there was some evidence of denial a few years ago). OPH could be more active on this file.

Bat droppings carry *Histoplasmosis* and mouse droppings carry the Hanta virus – worth a mention on page 31?

Page 38 – 1. Pre-consultation, Preliminary Site Alteration, and Design – does not address (and maybe can't ever) the issue of site alteration that takes place (long) before the pre-consultation stage), and isn't the mayor trying to fix the pre-consult stage problems?

Page 41 – if there is no inspection by city staff, the issue of construction sites attracting rats, raccoons, mice and other wildlife will be with us always. The problem also is at road and sewer construction sites.

Again, here is where Nick should mention that animals move into suburban areas to take advantage of newly planted shrubs and garbage that was not there before.

Can there be a verification of the statement "The Ottawa-Carleton Wildlife Centre provides the most progressive urban wildlife service in the country?"

Page 43 The Wildlife Fact Sheet – beavers will also eat cedars and hemlock if their favoured poplar is not there (i.e. long ago eaten)

Chipmunks will happily eat meat and can be predatory

Need Red Squirrels in this list – also predatory

Need to verify that Grey Squirrels have two litters per year.

Woodchuck – add a.k.a. Groundhog (to conform with page 48 Appendix C)

Add Black Duck – a species of concern – nests in the Carp Hills

#### Appendix C

- Delete the Word "Eeek"
- Delete the "s" in squirrel, raccoon etc and make it Canada Goose so that all the species listed are in the "singular"
- Delete "Look Mom" – sexist
- Leitrim Wetland doesn't have its boardwalk yet and, I believe it has not be turned over to South Nation yet.
- The Burnt Lands Alvar is a fragile ecosystem – too much visitor attention and trampling would not be a good idea

#### Document 4

##### Page 1

Municipal Act – Ottawa doesn't have a site alteration and grading bylaw – indicate by italics or some other means which ones we don't have

Define highway as most people don't think of a small city street as a highway.

Page 2 Planning Act – indicate that technical amendments to the harmonized Comprehensive Zoning Bylaw are constantly being made

Page 3 Provincial Policy Statement – add (which shall not be permitted ...threatened species)

Add the Ontario Heritage Act in regard to alterations of a building or demolition under the OHA because if it has a chimney that houses Chimney Swifts or eaves that house Barn Swallows, this is a wildlife issue.

Table 1 – Fisheries and Oceans Canada uses the Acronym DFO not FOC – say it and you will understand why)

This table also needs CFIA inserted for its role in preventing the introduction of invasive species and control of some once they are here.

Page 6 Community Design Plans are not mentioned in the OP therefore have no permanent power to control community design – admit it here.

Significant Wetlands – based on social characteristics? I thought it was a science-based assessment process. Change the "and" to "but in bullet 2

Natural Environment Area – change the "and" to "but in bullet 2.

Page 7 – change “addresses the ability” in bullet 2 or 4.7 to “desirability”

Page 8 bottom line – the Environmental Strategy – to be finished in 2011?

Page 9 is there not a contradiction between the last bullet “Preserve natural ... etc” and the unbulleted sentence that follows “The city’s zoning ...”

Page 10 add mention of the Ontario Heritage Act in regard to alteration or demolition (Chimney Swifts, Nighthawks, Barn Swallows



August 16<sup>th</sup>, 2012

Nicholas Stow  
City of Ottawa  
Planning and Growth Management Department  
110 Laurier Avenue West, 4<sup>th</sup> floor  
Ottawa, ON K1P 1J1

Nick.Stow@ottawa.ca  
Fax: (613) 580-2459

Dear Mr. Stow:

**Re: Comments for City of Ottawa Wildlife Strategy Report and Recommendations**

Thank you for circulating the draft Wildlife Strategy Report and Recommendations to the Ottawa Airport Authority. We have reviewed your draft report and have prepared a summary of a number of airport related regulations and policies from both the Airport Authority and Transport Canada.

These comments are divided into two sections. Part one provides a substantive summary of Transport Canada and Airport Authority policies, considerations and operational concerns, while outlining how it affects land uses in the vicinity of the airport. Part two is editorial in nature with suggestions of inclusions or edits to portions of the draft report.

**Part 1 – Airport and Related Wildlife Policies**

**a) Federal Legislative and Policy Context**

The Ottawa International Airport has in accordance with regulations made under the Federal Aeronautics Act, plans that explicitly identify wildlife risks and addresses active and passive approaches to management. The airport also has a requirement to meet a unique challenge of promoting aviation safety by reducing wildlife risks and hazards. The Airport Authority's strategy is mandated and informed by federal government policies such as the *Aeronautics Act* and the *Canadian Aviation Regulations* (CARs). Transport Canada also publishes and updates various documents such as TP13549 *Sharing the Skies: an Aviation Industry Guide to the Management of Wildlife Hazards* which provides a general background of wildlife hazards in aviation and suggests management procedures.

Another important Transport Canada document that informs Airport wildlife management is TP 11500 *Wildlife Control Procedures Manual*. TP 11500, updated in 2002, is a guide that informs Airport Operators on the management of wildlife and habitat problems. The guide also provides specific guidance for effective management and long-term problem solving for various species at airports. Many of the suggestions for regulations in this manual have been included in subsequent CARs amendments.

A 2006 update to the *Canadian Aviation Regulations, Part III, Subpart 2 – Airports* by Transport Canada obliges Airport Operators to develop and regularly update an Airport Wildlife Management Plan (AWMP).

### **b) Airport Wildlife Management Planning**

The goal of the Airport Wildlife Management plan is to promote aviation safety by reducing wildlife hazards and associated risks to aircraft and to airport operations caused by wildlife activities on and in the vicinity of the Airport.

In the AWMP there are a number of wildlife management measures available to minimize the potential for serious wildlife strikes. The three approaches that the AWMP specifically addresses are:

- i) Manipulating habitat and access to habitat at or near the airport;
- ii) Dispersing, removing or excluding wildlife from the airport; and
- iii) Influencing land use decisions around the airport that may introduce and affect hazards to aircraft.

Both the AWMP and Transport Canada maintain a list of critical species that identify the level of threat for each and corresponding management priority. For example, the Canada Goose has a very high risk level on both the AWMP and TP 11500 due to the possible severity of a strike and the incidence of this species. Ring-billed gulls are another species that is of high priority to both the Ottawa Airport and Transport Canada. A zero-tolerance active control policy for these species on the Airport includes methods such as pyrotechnics, bangers and whistles. The incidence of these species is also related to high risk activities located in the airport vicinity. For example, Transport Canada suggests that golf courses or waste transfer stations are inappropriate land uses in both the primary and secondary bird-hazard zones.

The wildlife hazard to airports is not limited to birds. Mammal species such as deer, coyotes and groundhogs can cause damage by striking aircraft, or in the case of groundhogs, causing ground stability issues by burrowing under active runways. Annual management for small

species such as groundhogs occurs by trapping and with habitat modification. For larger mammals, the installation of a security fence acts as a barrier.

The Ottawa Airport also makes an effort to influence land use decisions beyond the airport boundary. The Airport Authority actively engages the City of Ottawa planners, landowners and stakeholders, and agencies such as the NCC to address off-airport hazards.

### **c) Airport Zoning**

One of the regulatory tools used by the Airport to address wildlife hazards outside the Airport boundaries is the Airport Zoning Regulations (AZRs). The AZR is established under the Authority of the *Aeronautics Act*, Section 5.4, preventing lands in the vicinity of an airport from being used or developed in a manner that is hazardous to aircraft operations. Specifically, the AZR identifies a 'Bird Hazard Zone' where any land use or activity within the boundary that attracts birds is considered to be creating a hazard to aviation safety. Proposals within this boundary are subject to an additional approval condition by the City of Ottawa prohibiting land uses and activities that attract birds. A list of specific land uses and their associated risks is part of the information published and updated by Transport Canada in TP11500.

## **Part 2 – Suggested Editorial comments to Wildlife Report**

### **a) Body of Report**

Section 6.0 'Nuisance Wildlife' should refer to the possibility of potential vehicle and wildlife conflicts, including aircraft. These can occur and be lethal for any transportation mode including automobile and aircraft where a nuisance animal is in the travel path.

### **b) 'Document 4' Current Planning Practices for Wildlife**

The Document 4: Wildlife Strategy, Legislation and Policies for Other Organizations lists the Airport Authority, however; its relationship to the City is limited to planning on Airport Lands. The Airport Authority is also involved in the development control process and may restrict land uses and activities on lands outside the airport.

### **c) Appendices**

Appendix B: Other Legislation affecting Planning does not include the two pieces of federal legislation that enable airport wildlife management. The *Aeronautics Act*, introduced in 1985,

provides for the development and regulation of any aeronautics matter such as the Airport Zoning Regulations and the *Canadian Aviation Regulations* enables and mandates the Airport Wildlife Management Plan to be created and updated.

Appendix C. 'Example Structure and Content for the City's Wildlife Web Pages' may benefit from including a subsection that informs residents and land-owners or lessees in the bird-hazard zones about airport wildlife hazards and where to find information on how to adjust their land uses or activities to mitigate airport bird-hazards. This may be situated in the 'Prevention of human – wildlife conflicts' subsection or in its own subsection for residents near the airport.

Once again, thank you for circulating the draft Wildlife Strategy Report and Recommendations for comments. We appreciate consideration given to incorporating the suggested changes and comments. Please feel free to contact us should you have any concerns, questions or comments.

Sincerely,

***Ann M. Tremblay,***

Director, Airport Planning and Municipal Affairs  
Ottawa International Airport Authority  
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E : Ann.Tremblay@ottawa-airport.ca

CC: Alex Stecky-Efantis, OM CIAA





May 16<sup>th</sup>, 2013

Nick Stow  
Senior Planner  
Land Use and Natural Systems  
City of Ottawa

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Dear Mr. Stow:

**Re: Comments for City of Ottawa Wildlife Strategy Report and Recommendations**

Thank you for circulating the updated Wildlife Strategy Report and Recommendations to the Ottawa International Airport Authority. We have reviewed the April 2013 draft of the report and have prepared a brief summary of airport related wildlife policies for your review and inclusion into the revised report.

**Suggested subsection to be included in Section 8: Ottawa International Airport and Related Wildlife Policies**

The Ottawa International Airport has a wildlife plan and strategy that is mandated and informed by federal government policies such as the *Aeronautics Act*, the *Canadian Aviation Regulations*, and Transport Canada's *Wildlife Control Procedures Manual*. The goal of the Airport Wildlife Management Plan (AWMP) is to promote aviation safety by reducing wildlife hazards and associated risks to aircraft and to airport operations caused by wildlife activities on, and in the vicinity of the Airport.

In the AWMP there are a number of active and passive approaches to wildlife management available to minimize the potential for serious wildlife strikes. The AWMP identifies critical species that pose a threat such as the Canada Goose and Ring-billed gulls and outlines appropriate control policies. Mammal species such as deer, coyotes and groundhogs can also cause damage by striking aircraft, or in the case of groundhogs, causing ground stability issues by burrowing under active runways. The incidence of these species is also related to high risk activities located in the airport vicinity. For example, Transport Canada suggests that food-waste transfer stations or golf courses are inappropriate land uses in bird-hazard zones.

The Ottawa International Airport Authority actively engages the City of Ottawa planners, landowners and stakeholders, and agencies to address off-airport hazards. The Airport Zoning Regulations, established under the *Aeronautics Act* to address wildlife hazards outside the Airport Boundaries, are used to prevent lands in the vicinity of the airport from being used or developed

in a manner that is hazardous to aircraft operations. Specifically, the Airport Zoning Regulations identifies a 'Bird Hazard Zone' where any land use or activity within the boundary that attracts birds is considered to be creating a hazard to aviation safety. A list of specific land uses and their associated risks is part of the information published and updated by Transport Canada in TP11500.

**Comment on proposal for the City's website:**

The Education and Outreach section of the wildlife strategy recommends revising and expanding the wildlife portion of the City's website. We recommend that the revised content of the website include information for residents and land-owners or lessees in the bird-hazard zones about airport wildlife hazards and where to find information on how to adjust their land uses or activities to mitigate airport bird-hazards.

We appreciate your consideration of including the Airport Authority's comments. Please feel free to contact us should you have any concerns, questions or comments.

Sincerely,

***Alexander Stecky-Efantis***

Planner – Airport Planning and Municipal Affairs  
Ottawa International Airport Authority  
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CC: Ann Tremblay, OMCIAA

To Whom It May Concern:

In recent years, the City of Ottawa has experienced a continuing series of wildlife encounter issues and problems that has stymied citizens, city officials, city councillors, Ministry of Natural Resources staff and National Capital Commission staff. Be it wandering moose, a black bear on the loose, high numbers of deer-vehicle collisions, fisher or coyotes attacking/killing/eating pets, Canada geese despoiling public parks, wild turkeys destroying strawberry patches, beavers flooding ditches-fields-woodlots, raccoons/groundhogs/squirrels harassing residential properties, endangered Blanding's turtles stalling road construction, rat invasions in public parks, massive crow roosts near public hospitals and developed neighbourhoods, or insect infestations destroying residential lawns, the City has been unable to effectively identify and deliver needed remedies. While the absence of working partnerships between the City and other agencies has often been touted as a main cause of these dilemmas, the greater difficulty has been the absence of a meaningful, City-developed and implemented long-term strategy to deal with the wildlife realities within its boundaries, a strategy that goes beyond public relations and information dissemination to include remedies that resolve, not just accommodate these issues.

The Eastern Ontario Deer Advisory Committee, an ad hoc group of volunteers providing advice and assistance to the Kemptville MNR office in the management of whitetail deer, noted early in its work the continuing vacuum of policy direction and long-term strategic planning that dealt with issues surrounding a growing deer herd within the urbanized and rural portions of the City. Further reflection confirmed this situation was much more broad-based than deer alone; indeed, the link between coyote and deer issues was a clear example.

Aware that City Council was seeking advice and direction on some of these issues, the EODAC took it upon itself to develop and offer to the City an outline of what such a long-term wildlife management strategy might look like. EODAC's attached draft describes a strategy that would be essentially all species in scope, inclusive of a broad range of solutions [i.e. from information-only through to outright removal], a strategy that would be science-based, citizen-sensitive and delivered by properly trained and licensed staff.

The attached outline in its simplest description is a suggested table of contents for a long-term, all-inclusive wildlife management strategy for Ottawa. It is light on detail, and intended to provide guidance to professional wildlife biologist consultants who would write the Strategy.

EODAC's purpose in sharing this draft with you at this time is to seek your reaction to, and possible support for, this suggested approach towards a true long-term Wildlife Management Strategy for the City of Ottawa.

Signed:

Kerry Coleman

EODAC Chair

Larry E. Smith

EODAC Vice Chair

## EODAC COMPREHENSIVE WILDLIFE STRATEGY FOR THE CITY OF OTTAWA

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#### Overview of the Strategy's Component Parts

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- Processes / Agreements required to make remedial Actions Possible
- Species-by-species strategies
- Looming problems

August 2011

## OVERVIEW OF THE STRATEGY'S COMPONENT PARTS

**VISION:** The City needs to have an idea of where it wants to be in the future on this matter, and should have a statement to that effect.

**COUNCIL'S MISSION STATEMENT:** This is the statement from Councillors that triggered the notion of a strategy or planned response to wildlife issues.

**INTRODUCTION / BACKGROUND:** You need to know where you're coming from before a new way of doing business is developed.

**RELATIONSHIPS:** The history of Ottawa as it evolved from a small city to an amalgamated city region to the current City of Ottawa, set in the context of similarly evolving wildlife policies/strategies/programs at the provincial and federal levels would be useful, particularly where there are linkages between cause and effect.

**AGENTS OF CHANGE:** Many things cause change to the landscape and subsequently, to the wildlife that occupy it. These elements need to be recognized and identified before any remedial actions are contemplated.

**CITY OF OTTAWA WILDLIFE STRATEGY:** The scope of this strategy plus any special considerations should be articulated here, with subsequent sections and actions measured against it for conformity and consistency.

**PROCESSES/AGREEMENTS REQUIRED:** There is a need to be aware of the full range of actions required before any strategy can be initiated. Training, licensing, sightings, agreements, contracts, etc. are matters that should be dealt with before remedial actions are effected.

**SPECIES BY SPECIES STRATEGIES:** This section could be the beginning of a Part Two of the Strategy if need be. Would include all of the foregoing as may be required for context, with specific problem descriptions, actions required, roles and responsibilities of the parties, and results monitoring.

**LOOMING PROBLEMS:** This is where the issue of newly-perceived problems would be described, along with problem avoidance or reduction scenarios.



## DISCUSSION

### Vision

Example: "The City of Ottawa is planned and managed in a fashion that permits its citizens to enjoy wildlife within the City to the extent that their rights and enjoyment are not compromised or negated by the presence or activities of said wildlife."

### Council's Mission Statement re: Wildlife

[See the charge from Council to the city planners on this issue.]

### 1. Introduction/background

A] Brief history of the growth of the City, including transitions to Regional Municipality and finally, amalgamation [to include discussion of by-law evolutions].

B] Wildlife issues that have surfaced over the years and the City's response

C] Wildlife issues that are anticipated to arise in the near and longer terms [e.g. crow roosts, rats, squirrels, etc.]

D] Needed: a new long term City of Ottawa response to wildlife-related issues and opportunities.

### 2. Relationships

Changing landscapes, changing policies, changing expectations and changing solutions; the need for linkages to produce win-win solutions to:

- include a review of how the City has grown, how wildlife related policies and regulations at the municipal and provincial levels have evolved along with those of the federal government;

- review/demonstrate the linkages between wildlife and non-wildlife related policies, plans and by-laws

- Endangered species - a special case:	Who's in charge?
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- Invasive species – a second special case:	Who's in charge?
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- Wildlife-born diseases: a third special case:	Who's in charge?
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- Dangerous animal control - a fourth special case:	Who's in charge?
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### 3. Agents of Change

A] Municipal Plans

B] Provincial legislation, regulation, strategies and/or policies

- C] Federal legislation, regulation, strategies and/or policies
- D] Landowners and/or their agents
- E] International obligations
- F] Court challenges: failure to act

#### 4. A City of Ottawa Wildlife Strategy: What would it look like, what would it entail?

This discussion would have to include a description of what is and what isn't included, with an explanation of why.

Example: It would deal with problem wildlife [including insects]; exotic, invasive species; and endangered and dangerous animals, but would not deal with other non-issue species.

- The objective of the strategy would be clearly stated, e.g. "The City of Ottawa's intention under this Strategy is to accommodate wildlife within its boundaries in a manner that respects the needs of these species to the extent that they do not unduly limit or eliminate the rights, well-being or aspirations of the citizens of Ottawa."
- The species to receive particular attention under this strategy would be clarified and categorized, with a notation that, as future issues/opportunities arise, species could be added or removed from the list.

Suggested categories: Dangerous animals  
Invasive/exotic species  
Endangered species  
Nuisance animals

#### Suggested Category List:

Dangerous = Bear, coyote/coy-wolf hybrid, moose, deer plus any diseased or aggressive animals  
Invasive/exotic species = plant insect pests, escaped pets, game farms, reptiles, etc  
Endangered species = wildlife species listed either provincially or federally  
Nuisance animals = raccoons, beaver, skunks, bats, squirrels, groundhogs, etc

#### 5. Processes / Agreements required to make remedial Actions Possible

This section would include a full blown description of how to translate concerns into actions. With many delivery agents for prevention /correction of problems and with the multitude of legal and regulatory requirements for acting, the City must necessarily document and understand the obligations that bind it in undertaking any remedial work. A financially responsible City government should also be aware of the costs of any such undertakings as well as the costs of doing nothing. A fully transparent remedial strategy would also inform residents of their obligations and costs. Training, and in some cases, licensing for City staffers and others for things like firearms [for discharging tranquilizer guns] and controlled substances [licensing

required for use of controlled drugs], trapping licenses, etc. will be required and should be identified. Approved release sites for live-trapped wild big and small game should be identified with the assistance of professional wildlife specialists, to be located throughout the City. Inter-jurisdictional arrangements/agreements/contracts will be required and should be put into place early in the game, to avoid confusion/frustration/friction.

#### 6. Species-by-species strategies

These should include problem description, actions required, roles and responsibilities, and monitoring results.

#### 7. Looming problems

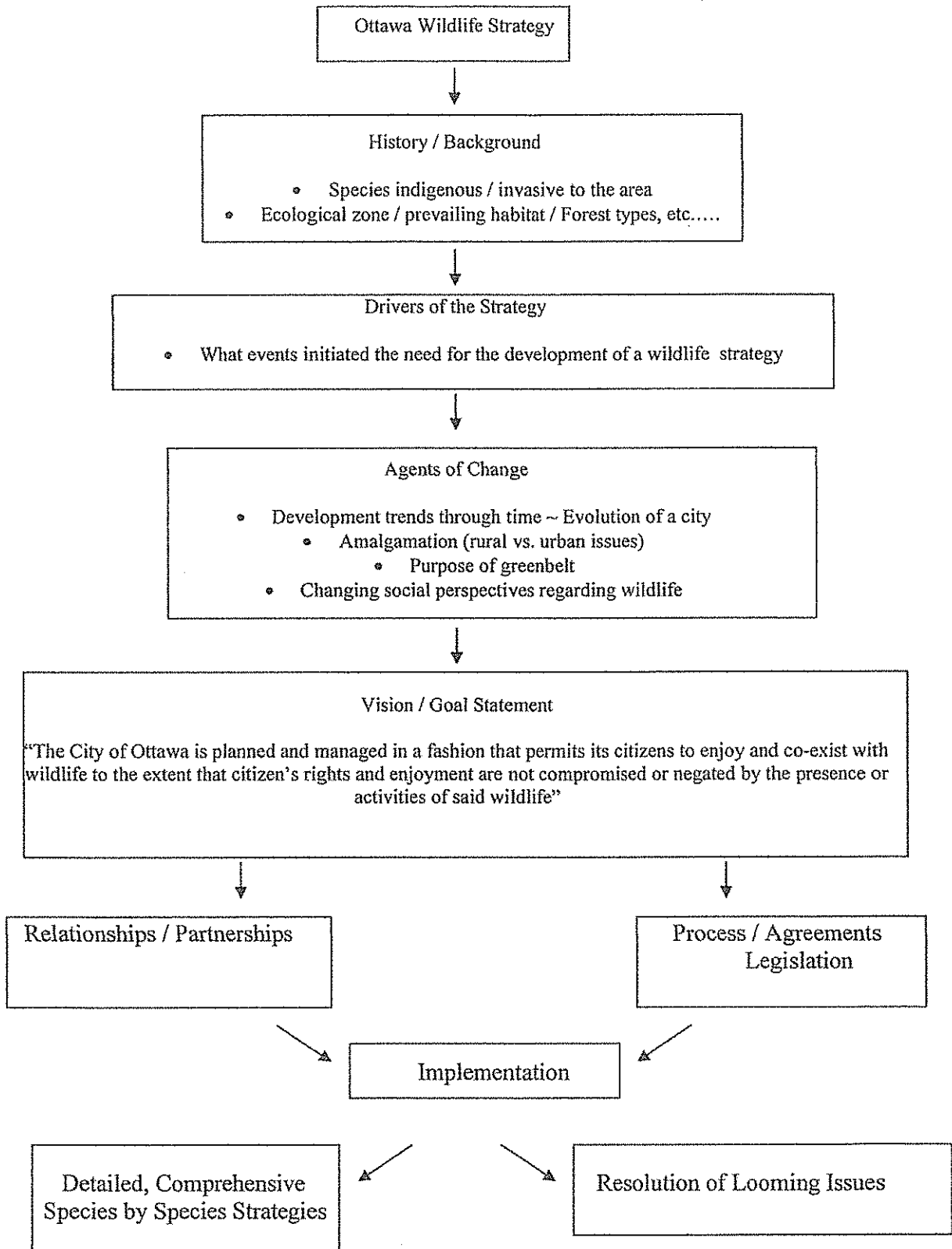
The strategy should include a description of the perceived problem-to-be, actions required to confirm or negate perception, and then actions required to resolve or avoid the confirmed problem-to-be.

Example: Massive evening crow roosts are growing in size and number across the City, as is the noise and excrement from these birds in the host neighbourhoods. In the recent past, West Nile disease was found to be carried by crows as well as mosquitoes. Should these links be proven as serious to human health, or, if the host neighbourhood is unduly disrupted by the noise and/or smell from these bird concentrations, action should be taken to remove the risks or the problems.

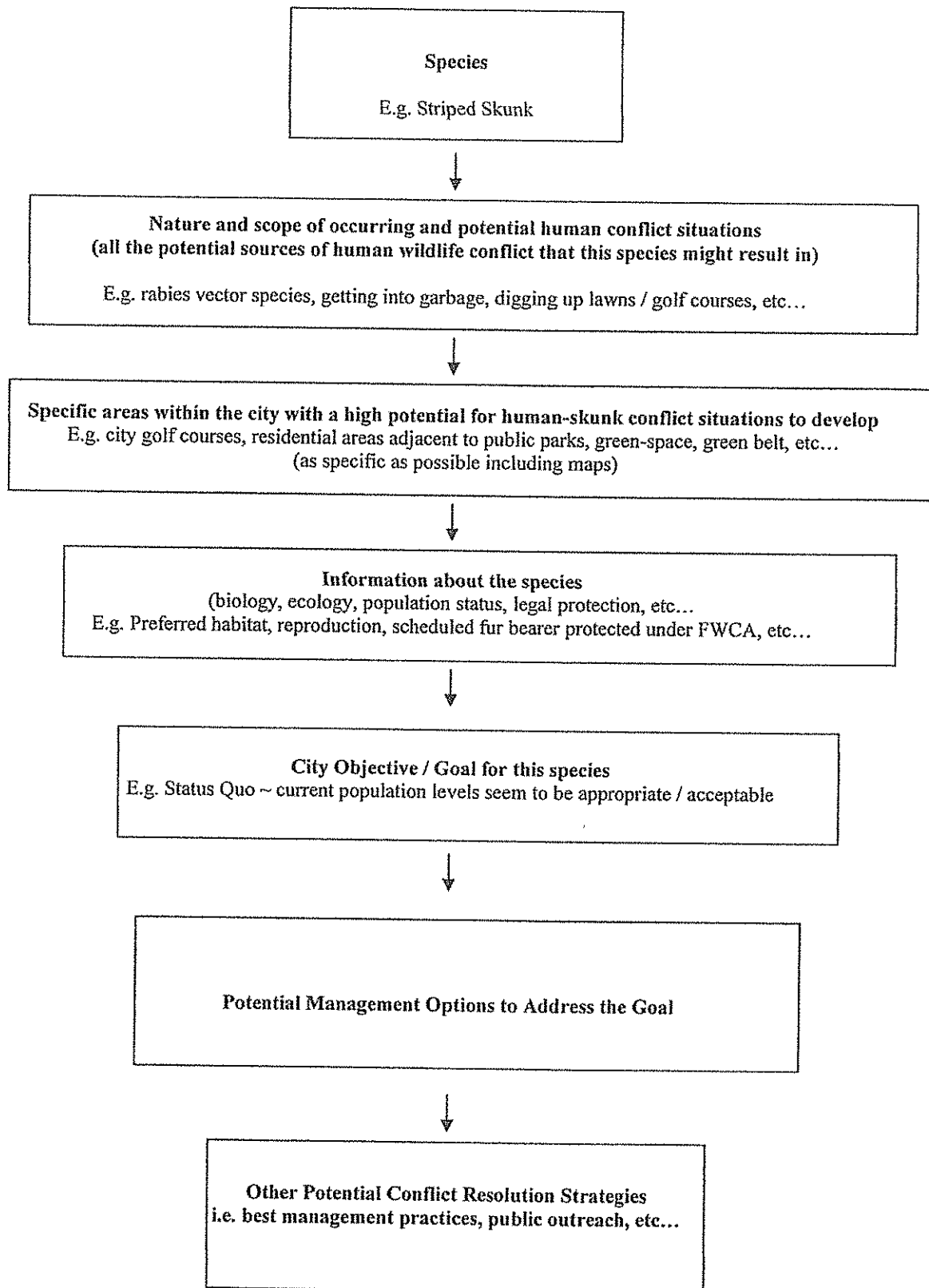
Example: Large deer populations in the City are vulnerable to becoming hosts to the Lyme disease tick, already found in Eastern Ontario and already affecting citizens there. As well, captive cervid farms [whitetail deer and elk] already exist in the City and west of Kanata; chronic wasting disease [CWD] has been found in similar herds in western Canada and the USA, and breeding stock exchanges between these farms occur frequently. Should the disease appear in the City, action would be required. Should Lyme disease ticks appear in any quantity on Ottawa-based deer, herd reduction scenarios may be required.

Similar action may be required in localized areas where deer concentrations and travel patterns are leading to unusually high traffic accidents. Deer can't read the signs put up.

Example: A fall 2010 article in the Ottawa Citizen highlighted the presence of free-roaming rats in a local park, with observers such as Michael Runtz suggesting that perhaps this would help to attract barred owls – part of the “natural process”. Although the article mentioned action by the City to put out baits to control the rats, the tone of the article suggested indifference to the rats' presence. Left unchecked, nearby residences could suddenly find themselves a haven for a growing rat population, and with it, the risk of damage and loss of real estate value. The City would enjoy little benefit from a rat-infested reputation.



Example of a specie specific human wildlife conflict resolution strategy framework







ATT. Nicholas Stow

Page 1 of 2

Main Identity

From: "Gerry Lee" [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Sent: [REDACTED]  
Subject: Some response points re. Draft City Wildlife Strategy, for your consideration

[REDACTED]

1. The draft contains a wide range of commentary that provides useful background, a few recommendations, and several appendices, many of which are tied together with the notion of creating a new City Wildlife Biologist position. While such a position might be helpful for the "how do we deliver" discussion on a future strategy, it does not respond to the issues that drove Councilors' request for a strategy in the first place [see Para. 2, page 4 "The scope of the Wildlife Strategy must reflect the context of Council's direction." The "scope" that follows interprets that direction to be simply reviews of City planning tools, principles re. wildlife management, and public education and awareness. Response to issues is not addressed by a simple review of the literature!
2. The draft does not speak to, let alone articulate, where the City might want to be in the future vis-à-vis the relationship of Ottawa citizens to wildlife present within the City boundaries. It does however speak at length to what citizens and developers must consider [do or not do] for wildlife. A "vision" statement would be helpful, one that describes the relationship and provides the back-check against actions subsequently taken, one that places limits on both citizens and wildlife. The Vision statement to follow is offered for consideration:  
"The City of Ottawa is planned and managed in a fashion that permits its citizens to enjoy and co-exist with wildlife to the extent that citizens' enjoyment and rights associated with living and working in Ottawa are not compromised or negated by the presence or activities of said wildlife."  
The Objective of this strategy [also not clearly articulated] would describe how the City planned to satisfy this Vision; again, the following is offered for consideration:  
"The Objective of this Wildlife Management Strategy is to respond to the above- noted Vision by accommodating wildlife within City boundaries, in a manner that respects the needs of species alongside the lawful rights, well being or aspirations of the citizens of Ottawa."
3. As written, this draft, as demonstrated by the extensive Table of Contents, is all over the map in terms of topics discussed, and appears to be seeking further direction from Councilors [e.g. pick what you like from this collection of ideas].
4. No species-specific action plans are offered in the draft strategy, something probably expected by Councilors, given their issues-driven concerns. Planning tools may help to avoid or minimize wildlife issues, but when a bear, coyote, deer, moose or rabid animal shows up at your doorstep, a pre-determined plan of action is what's needed. Properly trained and licensed responders with the right equipment and necessary co-operative protocols in place is essential if this or any other strategy is to be meaningful. EODAC offers its species-specific template for consideration.
5. As written, the draft strategy downplays –sometimes ignores– the federal Government role in wildlife management matters. The Migratory Birds Convention Act, the Environmental Protection Act, the Federal Fisheries Act, the Species at Risk Act and others provide restrictions on the City of Ottawa in addition to the Provincial pieces of legislation mentioned. Any final draft or strategy must correct this deficiency.

13/08/2012

6. A long-standing failure to manage relates to the issue of deer management within the developed portion of the City. The draft suggests that, should deer numbers exceed 7.5 deer per square kilometer in parts of the City, it may be necessary to recommend to MNR and the NCC to consider hunts or other means to keep the numbers down, this only because of the threat of Lyme disease. Vehicle collisions and associated human injuries are not mentioned, yet are annually the cause of great expenses and a number of injuries. Ottawa has one of the highest deer collision rates in any given year in Ontario, yet the City's response has been limited to posting deer crossing warnings for motorists. The MNR has stood ready to respond for years [it must be part of the authorization process] but the City hasn't acted. Many areas of the City have exceeded the 7.5 deer/square kilometre for years, but no action has been taken or requested.
7. The title "Wildlife Strategy" needs to be revised to reflect the ongoing nature of the wildlife issues Ottawa has, and will continue to face. A more appropriate title, "Wildlife Management Strategy", would better reflect this reality. There will always be wildlife issues to deal with; the best we can do is manage them appropriately.
8. The Wildlife Disease section is far too dismissive of the concerns citizens have raised and continue to raise. A significant re-write is required!

Appendix B

Summary of Public Comments to Ottawa.ca

Blank = no comment    1 = Supports comment    2 = opposes comment

	Initials of Commentor	TS	BP	PH	GL	DL	DP	LM	GR	SM	SH	GS	HP	MS	KM	FI	NJ	PH	CO	JT	AC	HM	ED	IT	IP
Approach	General opinion on Strategy	0	0	2	0	0	0	0	0	0	1	0	0	0	2	0	0	1	1	0	1	0	1	2	1
	Less strategy, more action				1					1															1
	Vision: more human-centred.				1																1				
	Vision: more wildlife-centred													1											
	Co-Existence									1										1					
Wildlife Resource Officer - Pro	Wildlife Resource Officer - Pro				1						1			1				1	1		1				1
	Wildlife Resource Officer - Con		1												1	1						1		1	
Hunting and Trapping	Hunting needed to manage populations	1		1	1												1							1	1
	Moratorium on hunting and trapping by the City		1							1			1	1											
Education and Outreach	Proposed outreach and education program						1																	2	1
	Proposed school program																								2
Landowners/Property Owners	More recognition of private property owner costs				1																				
	Agricultural losses exaggerated							1						1											
Experts and Service Providers	Training and/or licensing needed for wildlife service providers				1			1																	
	Need to work with wildlife experts				1	1	1																		1
	Volunteer to work on strategy				1	1	1							1											
Related Issues	Disease risks understated				1													1							1
	Recommendations on particular species							1				1	1	1											1
	Does not belong to ARAC								1					1											
	Reduce urban expansion								1		1														
	Feeding wildlife: more education, restrictions and enforcement							1																	1
	Enforce house cat restrictions													1									1		
	Problems caused by cuts to garbage pickup																					1			