

Responses to Public Comments

The following tables summarize the submissions received by the City on the draft significant woodlands guidelines, as posted on Ottawa.ca on November 23, 2018, along with the City responses. Some of the submissions have been edited or condensed for brevity and clarity.

First submission from the Greater Ottawa Home Builders Association

Staff made a presentation to the Greater Ottawa Home Builders on December 6, 2018, during the public consultation process. Staff met with the Greater Ottawa Home Builders on January 22, 2019 to discuss its written comments.

Issue	Questions and Concerns	City Response
Urban Boundary Expansion.	<ul style="list-style-type: none"> • How will significant woodlands be addressed in the event of an urban boundary expansion? 	<ul style="list-style-type: none"> • Urban boundary expansion has been removed from the guidelines. The staff report addresses this issue.
Natural Heritage Reference Manual	<ul style="list-style-type: none"> • How did the City reach its conclusions regarding the application of the NHRM criteria to Ottawa? • Confirmation of the application of the criteria to Eastern Ontario? • Application of the social and economic criterion? • Table 3. Significant Woodland Evaluation Criteria and Size Thresholds. 	<ul style="list-style-type: none"> • The request to use the Provincial (i.e. NHRM) criteria was made by the Province during discussions on OPA 76. The City consulted with staff from the Ministry of Natural Resources and Forestry district office in Kemptville and the regional office in Peterborough.
Table 4: Representation of Urban Criteria by Measures and Indicators	<ul style="list-style-type: none"> • It isn't clear how these measures and indicators are to be implemented. • There isn't sufficient information at the time of a development concept or CDP to do the required analyses. 	<ul style="list-style-type: none"> • The final guidelines include revisions to address these questions and issues.

	<ul style="list-style-type: none"> • It isn't clear when and which analyses need to be done during the planning process. • How is "public value" assessed, especially around social and religious functions? 	
"No negative impact and the mitigation hierarchy" (Section 6.1)	<ul style="list-style-type: none"> • How does this process apply, and when is developability confirmed? 	<ul style="list-style-type: none"> • The final guidelines include revisions to address this issue.
Exemptions for existing secondary plans, CDPs, and plans of subdivision (Section 6.3.5.1)	<ul style="list-style-type: none"> • What is meant by a major replacement or revision of the governing plan? 	<ul style="list-style-type: none"> • The guidelines have been revised to remove the references to replacement or major revisions to the governing plans.
Modification or removal of significant woodlands (Section 6.3.4.1)	<ul style="list-style-type: none"> • Several of the suggested consideration for modification or removal (i.e. trade-offs) may not be viable. 	<ul style="list-style-type: none"> • The final guidelines include revisions to address this issue.
Low-risk projects in rural areas (Section 6.2)	<ul style="list-style-type: none"> • How will low-risk projects be identified? 	<ul style="list-style-type: none"> • Staff will work with industry and rural stakeholders to develop criteria for the identification of low risk projects.
Compensation for Ecosystem Services (Section 6.3.5.3)	<ul style="list-style-type: none"> • What does "green design and technology mean": <ul style="list-style-type: none"> ○ Is there an accepted list? ○ Are there accepted standards? ○ Are they flexible to innovation? 	<ul style="list-style-type: none"> • The final guidelines include revisions to clarify and address this issue.
Individual Terms of Reference (Section 6.3.5.4)	<ul style="list-style-type: none"> • A "comparative assessment of development options" is work-intensive, costly, onerous, and unreasonable. 	<ul style="list-style-type: none"> • The final guidelines have been revised to require a comparative assessment of development options, "where feasible".
Age of woodlots.	<ul style="list-style-type: none"> • We need absolute clarity on how the age of a woodlot will be 	<ul style="list-style-type: none"> • The final guidelines include a new figure to clarify this issue. The age

	determined.	threshold for urban woodlands has been changed to 60 years, due to the inherent uncertainty in aging a woodlot.
Soil rooting volumes.	<ul style="list-style-type: none"> Does not apply to woodlots. 	<ul style="list-style-type: none"> Agreed. No revision necessary.
Examples (6.3.4.4)	<ul style="list-style-type: none"> The examples provided are not consistent with previous planning decisions in areas like Kanata North. 	<ul style="list-style-type: none"> The examples reflect the new definition of significant woodlands. Previous planning, such as that in Kanata North, reflected the old definition.
iTree	<ul style="list-style-type: none"> Are alternative tools acceptable? Are alternative approaches to assessing air quality improvement acceptable? 	<ul style="list-style-type: none"> Alternative tools are acceptable, if they provide equivalent information. The City will explore options that do not rely upon 3rd party software.
Parkland dedication	<ul style="list-style-type: none"> If woodlands are retained for their social, economic, and cultural values, shouldn't they be counted toward parkland dedication? 	<ul style="list-style-type: none"> No. The Provincial criteria for significant woodlands include social, economic, and cultural values.

Second submission from: the Greater Ottawa Home Builders Association

The Greater Ottawa Home Builders Association submitted a second set of comments on February 12, 2019.

Issue	Questions and Concerns	City Response
Organization of the Guidelines	Why are the assessment criteria and principles included in several sections? This could lead to confusion.	The criteria are broken down by rural and urban for sake of clarity, as there are differences in application. The policy underpinnings of the criteria are discussed in several places for the sake of members of public who may not be aware of them.
Waiving of EIS requirements for rural applications.	The guidelines say that, "the Planner must be familiar with the	The process by which a City planner may waive an EIS is already provided in

	<p>site, must agree that the project has a low risk of impact on the significant woodland.” This implies the planner is completing the impact assessment which is likely not the intent. The proponent must have the EIS done then the planner may decide a small risk of impact is permissible. Any required conditions to be registered on title should be determined through the EIS process.</p>	<p>Section 2.1 of the City’s Environmental Impact Statement Guidelines. The Significant Woodland Guidelines simply reiterate it in short to eliminate the need for cross-referencing.</p>
<p>Application to site alteration.</p>	<p>Section 6.3 uses 120 m as the distance for adjacency with respect to site alteration. This is not consistent with the Site Alteration By-law.</p>	<p>Agreed. The section has been revised for consistency with the Site Alteration By-law.</p>
<p>Rural criteria – definition of significance and evaluation of negative impacts</p>	<p>We seek clarification on the application of the criteria in Table 3. If only a portion of a woodland meets the criteria for significance, is the whole woodland deemed significant?</p>	<p>This would depend on the extent of existing knowledge. If it was known at pre-consultation that only a portion of a woodland met the criteria for significance, then only that portion would be deemed significant. In most cases, however, some field work will be required to evaluate the woodlot. However, the impacts of proposed project would only be evaluated on the values for which a woodland is found to be significant. If, for example, a woodland qualifies as significant solely for maturity, only impacts on the mature portion would be evaluated.</p>
<p>Table 5: Urban Criteria, Measures, and Indicators</p>	<p>For the sake of clarity, we recommend including text in the first row of Table 5</p>	<p>Staff do not entirely understand this recommendation. The significant</p>

	<p>specifying which definition of woodland will be used within the CDP or EMP.</p>	<p>woodland policies in the OP say that a treed area qualifies as a woodland if it meets the definition in either the Ecological Land Classification or the Forestry Act.</p>
<p>Individual Terms of Reference for EIS in the established urban area.</p>	<p>GOHBA would like to establish what the general TOR may be. A 'shopping list' of options should be established to guide the TOR. The guidelines as worded are too vague and GOHBA believes establishing individual TOR will create an additional delay to the development approval process.</p> <p>In the urban area, it needs to be determined at the pre-consultation stage as to whether a EIS is even required based on the overriding urban policy.</p>	<p>The "shopping list" of options is referenced in Section 6.4.4.4, where it states that, "the Terms of Reference will draw upon the criteria, measures, and indicators provided in Table 4."</p> <p>Establishing an individual Terms of Reference for the EIS at the pre-consultation phase should prevent delay, by scoping down the requirements to only those elements required for each particular project.</p> <p>Where a significant woodland is identified in the urban area, an EIS will always be required. It should be noted that one possible function of an EIS may be to document that the negative impacts of a project are justifiable on the basis of other PPS or Official Plan policies (see the Section 3.7 of the City's Environmental Impact Statement Guidelines).</p>
<p>Modification or removal of a woodland.</p>	<p>Modification or removal should provide a net environmental and "socio-economic" benefit to the</p>	<p>The Guidelines provide general direction on the assessment of socio-economic benefits throughout the document. Section 6.4 provides specific, detailed</p>

	<p>community. How will the socio-economic benefit be assessed? Will this be based on Ottawa specific considerations? GOHBA would like to further discuss this principle and it recommends the Guidelines provide examples for clarity.</p>	<p>direction, with further supporting direction in Appendix B. Appendices C and D provide specific examples.</p>
Parkland dedication	<p>Page 23 contains the only reference to the fact a woodlot may be accepted or may count as the required parkland dedication. Additional information confirming this should be included in the Guidelines.</p>	<p>Official Plan Policies 3.11 and 3.12 have not changed. Natural heritage systems features in Urban Expansion Study Areas and Developing Communities (Urban Expansion) must still be identified and conveyed to the City for \$1, in addition to parkland dedication. However, the City, at its discretion, may agree to the retention of a portion of a significant woodland as a wooded park, where such an arrangement makes sense within the community park plan.</p>
Planning Act Section 37	<p>Page 64 contains the only reference to the potential for a section 37 increase in exchange for a privately owned public space. This section should be expanded in order to provide additional clarity that it is an option and when may it be applied.</p>	<p>Any particulars for a section 37 matter would be determined through the consultation process that is required where section 37 benefits are being considered.</p>
Existing urban area: compensation	<p>The compensation section is confusing, contradictory or may result in double compensation being sought.</p> <p>The section says that compensation may be sought but then it goes on to</p>	<p>The Guidelines are not intended to deal with all instances of compensation. If “distinctive trees” are present on the property than the Urban Tree By-law will be applicable.</p>

	say “compensation for tree removal or loss may still be required under other City policies or by-laws”. It must be clarified that compensation is only to be provided once.	
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Comments from MHBC Planning, Urban Design & Landscape Architecture, on behalf of the Ontario Sand Stone and Gravel Association, and R.W. Tomlinson Ltd.

Issue	Questions and Concerns	City Response
Future revisions to the Guidelines	<ul style="list-style-type: none"> We request that the City commit to notify stakeholders, including OSSGA and Tomlinson, of any changes that are proposed to the Guidelines. 	<ul style="list-style-type: none"> Agreed. The City will endeavor to notify all stakeholders in advance of any changes to the Guidelines.
Official Plan Definition of Significant Woodlands	<ul style="list-style-type: none"> The definition is still under appeal [by OSSGA and Tomlinson, as of the date of comment]. We recommend that the City include a specific policy regarding aggregate extraction within significant woodlands. 	<ul style="list-style-type: none"> This appeal has been resolved, conditional upon approval by Council and the Tribunal.
Rural planning areas, forest cover, and thresholds.	<ul style="list-style-type: none"> The Rural Planning Areas and total forest cover on Figure 1 and Table 2 should be updated to reflect the 2017 forest cover once the City has completed the updated mapping. In the future, how/when will forest cover data be updated. 	<ul style="list-style-type: none"> Agreed. The new forest cover mapping is anticipated for March 2017. The City proposes to update forest cover every three years, in conjunction with its three year cycle of aerial photography.
Impact Evaluation and Mitigation – General Principles	<ul style="list-style-type: none"> Please reword the last section of the first paragraph in 6.1.2. 	<ul style="list-style-type: none"> The sentence has been reworded.

<p>Rural Significant Woodlands</p>	<ul style="list-style-type: none"> • Please add the following sentence to the end of the first paragraph in 6.2: “Conversely, features appearing on Schedule L may be determined to be not significant based on site investigations.” • Table 3: <ul style="list-style-type: none"> ○ It should be stated that the criteria are as defined in Section 7 of the 2010 NHRM. ○ What is the rationale for 0.8 ha? ○ Proximity criterion: this could be interpreted to mean all woodlands within 30 m of any. NHRM states this applies to woodlands located within a specified distance of “a significant natural feature or fish habitat likely receiving ecological benefit from the woodland.” In other words, only significant features receiving benefits from the woodland. ○ Linkages: the NHRM states that woodland should be considered significant if they are located within a defined natural heritage system or provide a connecting link between two other significant natural features, each of which 	<ul style="list-style-type: none"> • The sentence has been added. • The text ahead of the table has been revised to make this clear. • The minimum size limit of 0.8 ha was selected for consistency with the urban criteria. • Table 3 and the associated text only speak to minimum areas and sizes. They do not replace the NHRM guidance. • Appendix E was approved by City Council and forms part of a settlement of an appeal to OPA 76. It is based on a natural landscape linkage analysis that identified natural heritage system linkages and linkage features. Woodlands within these linkages contribute the
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	<p>is within a specified distance (e.g. 120 m). The draft guidelines state no minimum distance is required, which could cause woodlands to be included regardless of how far apart the significant features are located. The guidelines should specify a distance.</p> <p>Secondly, how was Appendix E developed and what is its Official status?</p>	<p>connectivity of the natural heritage system at a landscape level.</p>
<p>Aggregate Resources</p>	<ul style="list-style-type: none"> • The guidelines should be clear that woodlands approved for extraction in accordance with a license issued under the Aggregate Resources Act may be removed and that the mapping should be revised accordingly. • Significant woodlands should not be identified in licensed areas. • The value of protected aggregate should be considered when evaluating woodlands in unlicensed Aggregate Resource Areas. 	<ul style="list-style-type: none"> • Agreed. The guidelines have been revised to provide clarity. Significant woodlands mapping will be revised to exclude approved extraction areas during updates to the Natural Heritage System schedules in the OP. • The City has consulted with the MNRF on this request. The MNRF advises that natural heritage systems features are sometimes identified and retained within licensed areas outside the approved limits of extraction. • Such an approach is not consistent with the Provincial Policy Statement and the Natural Heritage Reference Manual. The NHRM explicitly recognizes that aggregate resources and natural

	<ul style="list-style-type: none"> Please change the last paragraph to be more consistent with the NHRM wording. 	<p>heritage resources sometimes overlap.</p> <ul style="list-style-type: none"> The wording has been revised.
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Comments from the Ministry of Natural Resources and Forestry, Kemptville District Office

Staff consulted with MNRF staff during the development of the significant woodlands policies in 2016, and on an *ad hoc* basis with MNRF staff during the development of the guidelines. Staff made a presentation to the MNRF Kemptville District on January 14, 2019. The comments from the MNRF have been summarized in three main themes.

Issue	Questions and Concerns	City Response
Urban forest cover mapping	<ul style="list-style-type: none"> It would be useful if information on the forest cover in the urban area and urban expansion areas was described, as was done for the rural planning areas. 	<ul style="list-style-type: none"> The City is carrying out an urban forest canopy study in collaboration with the NCC and the City of Gatineau. The results are anticipated for March 2019.
The 40-year age exemption for significant urban woodlands	<ul style="list-style-type: none"> The age exemption is not consistent with the PPS definition of woodlands, which only has requirements around the amount of tree cover. 	<ul style="list-style-type: none"> The 40-year age exemption [subsequently revised to 60 years] was included in the significant woodland policies approved by Council in 2016. The exemption is not related to the definition of woodlands, which was addressed elsewhere in those policies. It was introduced to protect the supply of urban development land, as required under other PPS policies.
The focus on the “ecosystem services” of significant urban woodlands, at the expense of the	<ul style="list-style-type: none"> The “no negative test” applies to degradation that threatens the health and integrity of the natural 	The City, in consultation with its stakeholders, has carefully considered the application of the Provincial Policy

<p>features themselves, is not consistent with the Provincial Policy Statement.</p>	<p>features or their ecological functions. The Guidelines should require protection of both the physical features and their functions.</p> <ul style="list-style-type: none"> • The PPS and the NHRM are clear that development and site alteration cannot have any residual negative impacts on a natural heritage feature or its ecological functions. Policies 2.1.5 and 2.1.8 of the PPS are clear and directive in their prohibition of negative impacts on natural heritage features. There is no discretion as to whether they are to be implemented. • The City cannot limit the no negative impact test to the ecological functions of significant woodlands. The test also applies to the health and integrity of the features themselves. • Compensation for the partial or complete removal of a woodland is not consistent with the no negative impact test and is not an acceptable approach under the PPS. • Negative impacts of urban development on significant woodlands is not unavoidable. There is still an opportunity to 	<p>Statement to significant urban woodlands. In the opinion of City staff, strict application of the “no negative impact” test in Policies 2.1.5 and 2.1.8 to significant urban woodlands could only be met if the municipality refused to identify significant urban woodlands. Such an outcome would not be consistent with the intent of the PPS.</p> <p>In the opinion of City staff, biological and ecological science demonstrates conclusively that woodlands in urban and urbanizing landscapes suffer a large number of negative impacts that, realistically, cannot be avoided or mitigated.</p> <p>These impacts include:</p> <ul style="list-style-type: none"> • physical isolation, limiting or eliminating movements between plant and animal populations; • edge effects, creating conditions that favour generalist species; • the loss of supporting habitats for groups such as amphibians, pollinators, and birds of prey; • the introduction of invasive plant and animal species, some with impacts on fundamental
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	<p>minimize the effects of urbanization on significant woodlands in urban expansion areas and developing neighbourhoods through design of land uses, protective zoning, buffer retention (or establishment of setbacks) and other measures.</p> <ul style="list-style-type: none"> • The Guidelines state that, modification or removal of a significant urban woodland should be considered only where it can be demonstrated that the woodland has limited public value in its natural state or poses a potential risk to public health and safety that cannot be mitigated.” This statement is not consistent with the PPS and NHRM. All values must be considered when evaluating impacts. It is not clear what potential health and safety risks are being contemplated, and why those risks could not be mitigated. • With regard to the statement, “any modification or removal of an urban woodlot should provide a net environmental and socio-economic benefit to the community”: (a) modification or Removal of Significant Urban Woodlands. Removal of an entire significant woodland is a negative impact and 	<p>ecological processes (e.g. invasive earthworms);</p> <ul style="list-style-type: none"> • predation by domestic and urban-adapted species, including house cats, skunks, raccoons, and Norway rats; • increased deposition of pollutants resulting in stress to vegetation and changes in soil chemistry, with resulting secondary impacts on all trophic levels; • changes in drainage and microclimate; • increased human activity, leading to a range of impacts and stresses (e.g. physical damage, waste, soil compaction, etc...). <p>These impacts inevitably lead to a substantial loss of biodiversity and ecological function in urban woodlands.</p> <p>Section 3.3 of the NHRM provides an example of such situation (Figure 3-1). However, the subsequent discussion of planning and mitigation approaches fails to present approaches and examples that are realistic or applicable to the urban area – especially in the context of other PPS</p>
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	<p>is not consistent with the PPS; (b) The concept of providing a net benefit should extend to other values.</p> <ul style="list-style-type: none">• The Guidelines should identify the potential for significant wildlife habitat.	<p>directions and priorities for land supply and efficient land use.</p> <p>At the same time, the PPS and the NHRM do not deal adequately with the social, economic, and cultural values of urban woodlands. The NHRM devotes only one paragraph to these values, of which only sentence speaks to the urban context. The NHRM does not provide any concrete direction or suggestions on how social, economic, and cultural values can or should be evaluated. This is not surprising, because most of the research on the social, economic, cultural, and health values of urban woodlands has occurred since the publication of the 2010 edition of the NHRM.</p> <p>In the opinion of City staff, the PPS policies and the NHRM fail to provide adequate guidance on the identification and evaluation of significant urban woodlands. Consequently, the City staff have sought consistency with the intent of the PPS, which, simply stated, is to facilitate good planning decisions.</p> <p>In the Guidelines, the City proposes an approach for the identification and</p>
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		<p>evaluation of significant woodlands that it believes will achieve good planning decisions. Working with a representative group of stakeholders, the City followed a systematic, evidence-based process to identification of the ecosystem services provided by urban woodlands. It has created an evaluation system that reflects these ecosystem services. And it has struck an appropriate balance between the protection and enhancement of those services with the other priorities and directions in the PPS.</p> <p>The City also notes that many of the biological and ecological values raised in discussions with the MNRF fall within other policies and natural heritage designations in the Official Plan. These include designated Urban Natural Features, provincially significant wetlands, significant valleylands, significant wildlife habitat, and watercourse setbacks.</p>
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Comments from the City’s Conservation Authority partners (Rideau Valley Conservation Authority, South Nation Conservation Authority, Mississippi Valley Conservation Authority)

The Conservation Partners submitted consolidated comments.

Issue	Questions and Concerns	City Response
Organization of the guidelines.	Consider including an executive summary.	The City considered an executive summary, but concluded that it would add too much length with too little benefit.
Table 3.	Consider defining “water”. The 30 m distance from water is not specified in the CA regulations, but in the policy for administration of the regulation.	Table 3 is intended to deal specifically with size thresholds. The clarification regarding the regulations and policies is noted.
Assessment of tree benefits.	Consider extending the analysis of tree benefits to non-significant woodlands in urban expansion study areas.	Noted.
Pre-clearing of woodlands.	<p>Policies could consider situations where woodlots are cleared before their significance has been assessed in both urban and rural landscapes.</p> <p>Consideration should be given to incentivizing landowners to retain woodlands in urban expansion areas by assigning some type of value to their retention.</p>	<p>This has been addressed in the Site Alteration By-law.</p> <p>This approach was considered, but deemed impractical.</p>
Compensation for ecosystem services.	It is difficult to replicate some ecosystem features and functions. Presumably this would be reflected in the evaluation.	Yes.
Compensation for ecosystem services.	The Conservation Authorities have woodland stewardship programs that	Noted.

	can assist in this respect. Early involvement of the Conservation Authorities would be beneficial.	
Calculations of future forest cover.	The Conservation Authorities could become involved in these calculations in their land use planning.	Noted.
Conveyance of natural heritage system features.	The Conservation Authorities could assist with the restoration/enhancement of these areas.	Noted.
Forest cover in planning areas.	In some catchments, forest cover is significantly below the [How Much Habitat is Enough] target of 30%. Any remaining forest cover in such areas could be considered significant by virtue of the area being otherwise devoid of forest.	The guidelines make use of the thresholds suggested in the Provincial Natural Heritage Reference Manual.
Forest cover in planning areas.	Please explain how the forest cover data in Table 1 was derived. For some areas the forest cover is higher than what the Cas identified in our reporting.	The forest cover is based upon the City's 2011 aerial photography and land cover mapping. The City will have updated 2017 forest cover data by March 2019.

Comments from the Greenspace Alliance of Canada's Capital

The Greenspace Alliance of Canada's Capital had a representative on the significant woodlands working group.

Issue	Questions and Concerns	City Response
Overall guidelines	We support the overall guidelines.	Noted.
Definition of rural planning areas	We believe that the Ottawa West planning area is too large and should be broken into three areas conforming to the Mississippi River, Carp River,	City staff considered and evaluate this option. Staff felt that the areas were sufficiently similar in the mix of land uses and land cover to be grouped

	and Ottawa River watershed boundaries.	together, and that each of the three proposed planning areas would be too small.
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Comments from Ottawa Public Health

Ottawa Public Health had a representative on the significant woodlands working group.

Issue	Questions and Concerns	City Response
Overall guidelines	“OPH supports the proposed guideline and notes that it reflects the Urban Forestry Management Plan, the evolving practices in Low Impact Development, the guidelines for urban and suburban design and OPH’s work in promoting healthy communities.”	Noted.

Comments from a resident

Issue	Questions and Concerns	City Response
Value of urban woodlands	Suggesting that [urban] woodlands have a greater value socially and economically than biologically is, I believe, a flawed approach.... All three criteria must be in balance; not best out of three.	The City’s approach does not discount biological values. It acknowledges that woodlands with low biological value can still have social and economic value in an urban environment. Biological values are represented in the evaluation criteria and in other City natural heritage policies.
No negative impact and the mitigation hierarchy.	The proposed approach appears to contradict the mitigation hierarchy and the no negative impact test.	The City’s approach interprets these principles within the full context of the Provincial Policy Statement. It also acknowledges that negative impacts

		on woodlands are inherent and unavoidable effect of an urbanizing landscape.
Impacts of recreational uses.	Do the guidelines only apply to development, or would they also apply to proposed recreational uses, specifically mountain biking and fat biking?	The guidelines do not apply to the evaluation of proposed recreational activities, unless those activities require a development approval. Recreational activities on City-owned properties are reviewed for their consistency with the sensitivity and the management objectives of the site.
Substitutions for ecological services	The suggested “substitutions” for alteration or removal of an urban woodland do not have equal value to a woodland in terms of ecological services.	In many cases, this is true. However, the alteration or removal of an urban woodland is sometime unavoidable. Under the current policies and approach, no accounting or substitution is required for the lost ecological services. The new policies introduce those requirements.
iTree	If a proponent makes use of another tool, the City should ensure that the resulting data is compatible with iTree. The City should monitor and promote best practices and tools.	Noted.
Evaluation of authorized uses	Authorized uses on City properties should be better defined and communicated to the public.	Noted.

This section added per motion N° PLC 2019 3/3:

Comments from a resident.

Issue	Questions and Concerns	City Response
<p>Development versus ecology</p>	<ul style="list-style-type: none"> • The Guidelines make an effort to balance development and ecology, but there is a line on p.3 that suggests a stronger emphasis on expediting development rather than ensuring ecological integrity. “Familiarity with these policies, criteria, and requirements will help to ensure that woodlands are identified and evaluated correctly, reducing the risks of delays in review and approval.” To ensure balance, we could add the phrase, “while at the same time ensuring ecological and related socio-economic goals are met.” • The draft Guidelines indicate that significant woodlands within areas covered by Secondary Plans, Community Design Plans, approved Plans of Subdivision, or Existing Conditions reports are exempt from the Guidelines until substantive review or replacement of those plans is sought. A rigorous woodlands strategy could include a process to actively propose/explore revisions to existing plans where there is a 	<ul style="list-style-type: none"> • The Guidelines apply to development applications and site alteration and are drafted in that context. They focus, therefore, on those approval processes. • The Guidelines also reflect the gradient of land uses from the rural to the urban area. Urban areas must be embedded within a sustainable ecosystem. However, the Provincial Policy Statement and the Official Plan target development to “settlement areas”. This reduces pressure on rural and natural landscapes. But it also means that development goals, not ecological goals, will always be the primary focus in the urban area. • Secondary Plans, Community Design Plans, and Plans of Subdivision identify and designate natural heritage features through a land use planning process. Once completed, they form the basis for subsequent planning application and approvals. They are linked to infrastructure servicing plans, transportation plans, and finer-grained land use planning

	<p>perceived ecological/socio-economic need.</p>	<p>decisions, as well as subsequent economic investments. It is not feasible to re-open these planning studies to consider additional natural heritage features.</p> <ul style="list-style-type: none"> • It is important to remember that the Province requires municipalities to provide an adequate supply of development land. If urban lands are excluded from development, they may need to be replaced through expansion of the urban boundary.
<p>Definition of “significant”.</p>	<ul style="list-style-type: none"> • Why does an urban woodland area have to be 0.8 ha or larger and 40 years of age or older to be significant? • Why exempt young, regenerating woodlands of brownfield sites; why not encourage regeneration? • Why not include smaller groves of trees, and other vegetated areas? 	<ul style="list-style-type: none"> • The significant woodlands policies and Guidelines respond directly to the Province’s natural heritage policy requirements. A size cut-off is explicit in those guidelines. The 0.8 ha threshold is consistent with the previous size threshold used in the City’s Urban Natural Features Study. • The age threshold addresses cases where vacant urban development lands, such as brownfield sites, have regenerated as young forest while awaiting the right planning and economic conditions for development. In terms of efficient land use, it does not make sense to exclude such lands from development. • Individual trees and smaller treed

		<p>areas are covered by the City's Urban Tree Conservation By-law. In some cases, they fall within other natural heritage or environmental policies, such as significant valleylands or watercourse setbacks.</p>
Reference to climate change	<ul style="list-style-type: none"> • The references to climate change in the document should be much stronger, especially the role that trees play in sequestering CO₂. • Climate change should have its own section in the Guidelines. • The Official Plan target for forest cover should be identified as a minimum target. 	<ul style="list-style-type: none"> • The emphasis given to climate change in the Guidelines reflects the discussions and consensus of the working group. • Climate change adaptation cuts across many of the ecosystem services identified for significant woodlands, receiving a larger emphasis than might at first appear. • The City will be re-evaluating its forest cover targets through the Urban Forest Management Plan.
Human needs and ecological integrity.	<ul style="list-style-type: none"> • The term ecosystem "services" focuses too much on human needs as opposed to ecosystem needs. This is illustrated by the reference to green design and technology as a substitute for urban woodlands. • There may be ecological value in retaining "untamed" woodlands, despite some natural hazards, while restricting human access. We should allow for small nature preserves. • There should be a more 	<ul style="list-style-type: none"> • The term "ecosystem services" is used within the urban context. Ecosystem benefits would embrace a much larger suite of processes and functions, many of which have little relevance in a planning context. • Restricting access to municipally owned greenspace is extremely difficult to enforce. It would also raise the question of whether such an area should be in the ownership of the municipality.

	substantive role in the Guidelines for the Algonquin Nation, particularly in the context of Reconciliation.	<ul style="list-style-type: none"> The City of Ottawa is currently working with the Algonquin Nation to establish consultation processes.
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Comments from a resident

Issue	Questions and Concerns	City Response
Definition of rural planning areas.	<ul style="list-style-type: none"> The Ottawa West rural planning area appears too large. High forest cover in the Constance Creek watershed and the Mississippi River watershed offset low forest cover in the Carp watershed. The areas should be split to reflect their different levels of forest cover. 	<ul style="list-style-type: none"> City staff considered and evaluated this option. Staff felt that the areas were sufficiently similar in the mix of land uses and land cover to be grouped together, and that each of the three proposed planning areas would be too small.

Comments from a resident

Issue	Questions and Concerns	City Response
The application of the Significant Woodlands policies to the overall urban forest.	<ul style="list-style-type: none"> Should the significant woodlands policies apply to groves of trees identified by citizens or a community has having heritage value? Will the significant woodlands policies translate into a by-law or to amendment of the existing tree by-laws? Will the significant woodlands policy inform and influence the on- 	<ul style="list-style-type: none"> The significant woodlands policies will only apply to groups of trees meeting the definition of significant woodlands in Policy 2.4.2(1) of the Official Plan. The significant woodlands policies apply to planning applications and decisions, as well as the Site Alteration By-law. The Site Alteration By-law includes increased protections for

	going review of the Urban Tree Conservation By-law?	woodlands in the peri-urban area, although it includes exemptions for agricultural operations. <ul style="list-style-type: none"> • It is too early to know how the significant woodlands policies and guidelines might affect the Urban Tree Conservation By-law.
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City View Community Association

Issue	Questions and Concerns	City Response
21 Withrow Avenue	<ul style="list-style-type: none"> • The trees at 21 Withrow Avenue should be considered significant woodland and protected under the significant woodlands policies. 	<ul style="list-style-type: none"> • The trees at 21 Withrow Avenue do not meet the definition of significant urban woodlands as approved by Council of 14 December 2016. The tree cover does not meet the definition of “forest” and does not total 0.8 hectares.

Comments from a resident

Issue	Questions and Concerns	City Response
Overall impression	<ul style="list-style-type: none"> • I am delighted to see the inclusion of a breadth of the criteria being used for assessment, in particular to see the public health/human health considerations. I am optimistic that the stated priorities will influence decisions and that exceptions/exemptions are limited. 	<ul style="list-style-type: none"> • Noted.
Community benefit	<ul style="list-style-type: none"> • Greater weight should be given to 	<ul style="list-style-type: none"> • The emphasis given to different

	<p>the importance of greenspace for fostering community identity, social cohesion, social connectedness, community engagement, and sense of place, especially near social housing or developments that include affordable housing.</p>	<p>ecosystem services in the Guidelines reflects the discussions and consensus of the working group. Community benefit cuts across a number of criteria and receives more weight than might be immediately apparent.</p>
Local examples	<ul style="list-style-type: none"> • The guidelines should make more use of local examples and local priorities: e.g. local species at risk, locally significant invasive species. 	<ul style="list-style-type: none"> • This level of detail will normally be found in an Environmental Impact Statement. Lists of species at risk may change; invasive species may become more or less problematic with time.
Extreme weather/climate change regulation	<ul style="list-style-type: none"> • Greater weight should be given to these ecosystem services. 	<ul style="list-style-type: none"> • The emphasis given to different ecosystem services in the Guidelines reflects the discussions and consensus of the working group. Mitigation of climate change and extreme weather cuts across a number of criteria and receives more weight than might be immediately apparent.
Relationship to other plans and policies	<ul style="list-style-type: none"> • The Guidelines should be cross-referenced with other plans and policies, such as the Wildlife Strategy, Air Quality and Climate Change Strategy, etc.... 	<ul style="list-style-type: none"> • The Guidelines have been written to complement other City plans and policies. However, in order to limit the size of an already detailed and lengthy document, only essential background information has been included. More information is available in the Environmental Impact Statement Guidelines.

Comments from a resident

Issue	Questions and Concerns	City Response
East side of the Rideau River	<ul style="list-style-type: none"> The natural area on the east shore of the Rideau River, opposite Old Ottawa East, would make a great urban park. 	<ul style="list-style-type: none"> These lands are owned by the Federal Government. The Capital Urban Lands Plan identifies this part of the Rideau River shoreline as natural area, with urban redevelopment behind it in proximity to the new Hurdman LRT station.

Comments from a resident

Issue	Questions and Concerns	City Response
The importance of urban woodlands	<ul style="list-style-type: none"> Urban woodlands provide a connection to Nature that parks cannot. Their preservation should remain a priority. 	<ul style="list-style-type: none"> Noted.

Comments from a resident

Issue	Questions and Concerns	City Response
Urban woodlands	<ul style="list-style-type: none"> The guidelines should include a map of urban woodlands. 	<ul style="list-style-type: none"> Such a map is in preparation, but outside the Guidelines.
Urban expansion	<ul style="list-style-type: none"> Page 6 includes the following sentence: “woodlands often occur in peri-urban areas, where the City has identified lands for future urban expansion.” No such lands have been identified to date. Perhaps it should say, “may identify”. 	<ul style="list-style-type: none"> This sentence referred to Urban Expansion Study Areas, which the City has identified for urban expansion, but has not yet approved for urban development. Noted.

	<ul style="list-style-type: none"> For consistency, the term peri-urban should appear in the flowchart in Appendix A. 	
NHRM Criterion 1 - Size	<ul style="list-style-type: none"> Does a rural woodland need to meet Criterion 1 (size) in the NHRM to be deemed significant? 	<ul style="list-style-type: none"> No. The NHRM is clear that a woodland can be considered significant if it meets any one of the evaluation criteria. However, several criteria have their own size thresholds.
Reference to Official Plan policies	<ul style="list-style-type: none"> There are two references on page 10 to Official Plan policies. These should be identified and also whether they are under appeal. 	<ul style="list-style-type: none"> These are identified as the significant woodlands policies. At present, these policies reflect the will of Council and are reflected in the Council Guidelines. If a successful appeal occurs of the policies, then the Guidelines would be withdrawn or modified as necessary.
Section 5.2.2 – Existing Conditions reports	<ul style="list-style-type: none"> The Guidelines provide exemptions for areas covered by Existing Conditions Reports, “submitted and accepted by the City...” Staff approval is not necessarily transparent to the community and can leave doubt as to the applicability of the Guideline. 	<ul style="list-style-type: none"> The review and acceptance of Existing Conditions Reports and Environmental Impact Statements is normally delegated to the staff level. The exemption for Existing Conditions Reports was added as a transition provision for areas where planning is not yet complete, but has proceeded past the identification of the natural heritage system.
The “no negative impact” standard in the PPS.	<ul style="list-style-type: none"> The guidelines need to be very clear about how this standard is applied in the Guidelines. The Guidelines should quote and 	<ul style="list-style-type: none"> The City acknowledges that the Guidelines do not reflect a strict interpretation of the no negative impact standard. The City, in

	<p>make use of the PPS definition of “no negative impact.”</p>	<p>consultation with its stakeholders, has carefully considered the application of the Provincial Policy Statement to significant urban woodlands. In the opinion of City staff, strict application of the “no negative impact” test in Policies 2.1.5 and 2.1.8 to significant urban woodlands could only be met if the municipality refused to identify significant urban woodlands. Such an outcome would not be consistent with the intent of the PPS. Please see the response to the MNRF comments for more detail.</p>
<p>The “no negative impact” standard in the PPS.</p>	<ul style="list-style-type: none"> • The EIS Guidelines are quoted as saying, “projects with residual negative impacts to significant natural features or ecological functions may not be approved.” Has this ever happened? 	<ul style="list-style-type: none"> • Yes. Typically, however, the proponent has either abandoned the application or revised it to the satisfaction of staff.
<p>Obligation to Acquire</p>	<ul style="list-style-type: none"> • The Greenspace Alliance disagrees with the City’s Legal Services Department on this issue. 	<ul style="list-style-type: none"> • Noted.
<p>EMPS and EISs</p>	<ul style="list-style-type: none"> • Does Council always approve Environmental Management Plans and Environmental Impact Statements? 	<ul style="list-style-type: none"> • Council typically approves Environmental Management Plans in conjunction with Community Design Plans. Council does not directly approve Environmental Impact Statements (that authority is delegated to staff), but they do approve the conditions of approval

		that follow from those EIS documents.
Area threshold for older woodlands (NHRM Criterion 3)	<ul style="list-style-type: none"> Table 3 includes an area threshold for older woodlands. I do not see that size reference in the NHRM. 	<ul style="list-style-type: none"> Table 7-2 in the NHRM says, “characteristics of older woodlands or woodlands with larger tree size structure in native species and meet minimum area thresholds (e.g., 1 – 10 ha, depending on the circumstance)”.
Ecosystem Services Toolkit and iTree Eco	<ul style="list-style-type: none"> The criteria in Table 4 were derived from the Ecosystem Services Toolkit. The process and methodology for doing so should be referenced and outlined in the Guidelines, along with iTree, to withstand challenge. 	<ul style="list-style-type: none"> The Ecosystem Services Toolkit is referenced in Section 5.2 of the Guidelines. iTree is described in Section 7.1.
Table 4	<ul style="list-style-type: none"> Should the criterion, “sense of place and heritage” not be represented by “unusual recreational, educational, cultural opportunities”? 	<ul style="list-style-type: none"> No. This criterion is intended to reflect a more historical perspective that may extend beyond more temporary or transient uses.
Table 5	<ul style="list-style-type: none"> A different format might make this table more readable. 	<ul style="list-style-type: none"> Noted.
6.3.2 – Tree Canopy and Greenspace Targets	<ul style="list-style-type: none"> How were these numbers derived? What is the source and methodology? 	<ul style="list-style-type: none"> The source is cited in the text: Official Plan Policies 2.4.5 (5 – 8).
6.3.5.2 – Context and Constraints	<ul style="list-style-type: none"> The last sentence says, “however, in the established urban area, an explicit focus on ecosystem services may lead logically to consideration of modified forms, trade-offs, or even substitution for the functions of urban woodlands.” 	<ul style="list-style-type: none"> Section 6.3.5.2 provides the context for this statement. More detail appears in the following section, 6.3.5.3 – Compensation for Ecosystems Services. The basic principle appears throughout the discussion of significant urban

	Could you explain further what you mean?	woodlands.
Appendix B.	<ul style="list-style-type: none"> The phase, “should be screened out from development,” is unclear. 	<ul style="list-style-type: none"> This appendix supports Section 6.3.1 of the Guidelines, which provides a more complete explanation.
Appendix E	<ul style="list-style-type: none"> The urban boundary should appear in the legend. The Greenbelt should be more clearly marked, and the linkages should be rendered in a darker colour. 	<ul style="list-style-type: none"> Noted.
Continuing consultation	<ul style="list-style-type: none"> Despite the commendable work of a working group consisting of a range of stakeholders, members of the development industry may still balk and maintain their appeal of OPA 179. I urge you to keep the dialogue open with all stakeholder to ensure all-round support. 	<ul style="list-style-type: none"> Noted.