



15, rue Taschereau, Suite 240 Gatineau (Québec) J8Y 2V6

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www.cpaws-ov-vo.org CRA/ARC #1068605272 RR000

December 5, 2019

Angela Taylor, P. Eng.

Senior Project Engineer,

Transportation Planning

Transportation Services Department

City of Ottawa

111 Laurier Avenue West

Ottawa, Ontario K1R 6H4

By email: angela.taylor@ottawa.ca

RE: Brian Coburn Boulevard / Cumberland Transitway / Blair Road Environmental Assessment Study

Ms. Taylor,

The Ottawa Valley Chapter of the Canadian Parks and Wilderness Society (CPAWS-OV) was founded in 1969 in response to threats to the ecological integrity of Gatineau Park and other natural areas in and around the National Capital Region. The organization represents over 1000 donors and some 6000 supporters in the City of Ottawa. CPAWS-OV works to establish new parks and protected areas, to ensure that existing protected areas are managed in such a way as to maintain their ecological integrity and we work to identify, protect and restore key connections across the landscape which allow for the movement of plants and animals. Finally, we work to connect people to nature through education programs for children, youth and organized groups.

The National Capital Greenbelt is one of the defining elements of the Ottawa Region. The Greenbelt provides countless ecological goods and services to residents of the City of Ottawa, such as clean water, summer cooling and spring flood mitigation. Moreover, the Greenbelt is a source of locally produced food and helps support a dynamic agricultural sector inside the City of Ottawa. The recreational activities offered in the Greenbelt are varied and provide residents and visitors the opportunity to live active, healthy lifestyles while connecting to rural landscapes and nature. Stony Swamp and Mer Bleue are among the most biologically diverse areas in eastern Ontario and support many species at risk. These areas are under constant threat from external forces such as climate change, invasive species and overuse by residents and visitors. They are also heavily fragmented as a result of roads, railways and utility corridors.



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CPAWS-OV, along with many other community and environmental groups were engaged in the renewal of the Greenbelt Master Plan in 2012-2013 where it was agreed that new fragments across the Greenbelt would be kept to a minimum and that additional care would be taken to maintain the ecological integrity of Mer Bleue and Stony Swamp among other sites.

At a regional level, the Greenbelt plays an important role in supporting ecological connectivity, it provides connections across the urban area and there remains connectivity potential to the south (Marlborough Forest) and to the east (Larose Forest). The landscapes located in between areas like Shirley's Bay, Stony Swamp or Mer Bleue are just as important as these core natural areas, as they provide linkages and buffers which are essential to long term viability of the core natural areas.

The Mer Bleue sector of the Greenbelt is already heavily fragmented as a result of a number of existing roads and encroachments into the natural area. CPAWS-OV is of the opinion that the area cannot support any further fragments and that efforts must be taken by the City of Ottawa and the National Capital Commission (NCC) to mitigate existing roads and fragments before any new roads are approved.

Transportation projects, such as the Brian Coburn Boulevard extension should not be assessed in isolation, but rather as part of a broader study of the cumulative impacts of all roads and fragments, both existing and planned, across the entire Greenbelt.

CPAWS-OV reviewed the four shortlisted options still under consideration for the Brian Coburn Boulevard extension. We are that all four options will have negative impacts on the natural environment.

Shortlist options 1 and 4:

We appreciate that Options 1 and 4 will make use of an existing fragment (Blackburn Bypass and Innes Road) and that both options would run adjacent to an established community, but we are concerned that a new roadway infrastructure will be established to provide a connection to the Walkley-Innes connection, in particular, a new roadway south and west of the Innes/Blackburn Bypass intersection. We recommend the City abandon this extraneous connection and instead follow the Innes Road alignment west to connect with the future Walkley-Innes Connection. This would reduce unnecessary fragmentation, habitat loss and impacts on farm land. CPAWS-OV has a preference for Option 4 in that existing roadways would be utilized for the extension of Brian Coburn Boulevard in the east end (Navan Road) and that Greenbelt lands would only be used for transit (again, in the east-end). We recommend that the transit corridor be located as close as possible to the existing fragments and thus run along Navan Road and the Blackburn Bypass. We strongly support transit connections to existing communities north of the Blackburn Bypass.

Shortlist options 5 and 7:

We cannot support and strongly oppose Options 5 and 7 as both involve essentially constructing a new, six-lane, highway across the Greenbelt in close proximity to Mer Bleue, an internationally recognized wetland complex and site of one of the longest running carbon studies in Canada. We feel the proposed alignment is simply too close to the core natural areas of Mer Bleue, Mud Creek and associated provincially significant wetlands and would have significant, long



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term and irreparable impacts on this highly sensitive area. While the maps provided did not include a scale, based on our calculations, the proposed Option 7 alignment would run within approximately 300 meters of the Mer Bleue Ramsar Site boundary, given the significance of this wetland complex, we feel this does not provide enough of a set back or a buffer to fully insulate Mer Bleue from the proposed roadway. The proposed highway will negatively affect forest cover and cause unnecessary habitat fragmentation, including impacts on species at risk habitat. The proposed Renaud Road - Brian Coburn alignment in both options would sever all natural linkages between Mer Bleue and areas to the north, including towards Greens Creek and the Ottawa River. Option 5 is particularly problematic as it appears to suggest not only establishing a new highway (Brian Coburn - Renaud Road), but also expansions to Innes Road and the Blackburn Bypass. We are also concerned that the proposed Options 5 and 7 would lead to a devitalization of agricultural land as a result of it being fragmented, which could then lead to pressure by the City and developers to make this land available for commercial or residential development if no longer suitable or desirable for agriculture.

While we applaud the City of Ottawa for including a bus rapid transit corridor as part of all options being considered, we feel the addition of new regular traffic lanes across the Greenbelt will not encourage residents to make use of public transit. We recommend that all future development, even development outside the core and beyond the Greenbelt be oriented toward transit. This will support the City of Ottawa's climate and emissions targets. The Blair Road and Highway 174 interchange is already heavily congested and the situation will only be made worse as a result of new traffic being directed toward this area from not only a new Brian Coburn Boulevard but also from a potential Walkley-Innes Connector from the south. The funding and resources being devoted to this current project would be much better invested in a transit strategy for east-end communities which could include extending light rail south of the proposed terminus at Trim Road in order to serve growing communities. Fundamentally, the City must work with partners to address the lack of employment opportunities in the Orleans sector as the addition of new traffic lanes is not sustainable in the long term and will not alleviate traffic congestion currently being experienced.

While we feel there are already far too many roads across the Greenbelt and that it could be possible to rationalize existing roads and transit to avoid building new transportation corridors, we would be prepared to support Option 4 provided the City of Ottawa accepts to abandon the proposed spur running from the intersection of Innes Road and the Blackburn Bypass to the south and west (connecting with the Walkley-Innes Connection) and that efforts be made to combine regular traffic and transit inside the same right-of-way. Moreover, we ask that the City develop and implement meaningful measures to mitigate the impacts of this expanded road on wildlife, connectivity and the local community and, at the same time, address the impacts of existing roads on the Mer Bleue ecosystem, such as Anderson Road which is known to have high levels of wildlife mortality. There already exists considerable data on wildlife mortality along Anderson Road and CPAWS Ottawa Valley would be prepared to work with the City of Ottawa and the NCC on a mitigation strategy for Anderson Road and Ramsayville Road.

The City of Ottawa must recognize and respect the ecological, social and cultural value of the Greenbelt and the countless benefits it provides to residents of Ottawa. We urge the City of Ottawa take steps to support the continued success of the Greenbelt and to work in collaboration with, and not in opposition to, the National Capital Commission and groups like CPAWS Ottawa Valley to safeguard this important landscape for future generations.



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We look forward to the next steps in this process and we remain available to help the City of Ottawa move forward in a sustainable fashion.

Sincerely,

John McDonnell

Executive Director

CC:

- -Tobi Nussbaum, CEO, National Capital Commission,
- -National Capital Commission Board Members,
- -Eva Katic, Director, Greenbelt lands, National Capital Commission,
- -Hon. Anita Anand, Minister of Public Service and Procurement and Minister Responsible for the National Capital Commission,
- -Hon. Catherine McKenna, Member of Parliament for Ottawa-Centre and Minister of Infrastructure and Communities,
- -Hon. Mona Fortier, Member of Parliament for Ottawa-Vanier and Minister of Middle Class Prosperity and Associate Minister of Finance,
- -Marie-France Lalonde, Member of Parliament for Orleans,
- -Hon. Jonathan Wilkinson, Minister of Environment and Climate Change,
- -Jim Watson, Mayor of Ottawa,
- -Matt Luloff, Ottawa City Councillor,
- -Laura Dudas, Ottawa City Councillor,
- -Tim Tierney, Ottawa City Councillor,
- -Stephen Blais, Ottawa City Councillor,
- -Eli El-Chantiry, Ottawa City Councillor, Chair, Agriculture and Rural Affairs Committee,
- -Scott Moffat, Ottawa City Councillor, Chair, Standing Committee on Environmental Protection, Water and Waste Management,



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-Sean Menard, Ottawa City Councillor, Vice Chair, Standing Committee on Environmental Protection, Water and Waste Management,