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Chair and Members,
Planning and Environment Committee,
City of London
P O Box 5035
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Dear Members of the Committee,

Re: Agenda Item #21

Thank you for the opportunity to speak to this item regarding the Stanton Drain.

Unlike its highly unappealing name, the land that comprises the “drain” and Hyde Park SWM Facility 4 is incredibly beautiful.

More importantly, it is home to 37 documented bird species (most of which are protected under the *Migratory Bird Convention Act*), 6 species of amphibians present in large numbers making the wetland areas significant in their support of wildlife and to an array of plant and tree species.

In addition, the City’s documents fail to substantively address the continued incremental effects of habitat destruction on the health of the City’s ecosystem. Ecosystems like the habitat around the Stanton Drain are largely seen as compromised and therefore are less deserving of protection even with the rich diversity of plant and animal life. Largely absent in many of the City’s documents is discussion about the role that beaver, muskrat and other wild animals play in the natural heritage features of the site. Both beaver and muskrat are present with virtually no assessment of their role in the formation and health of the wetlands present in the area and the wildlife who depend on wetland habitat. In fact beaver are blamed for “water quality” issues without assessing the impact of agricultural and residential runoff pollutants on the water systems. Beaver are seen as an impediment to this engineering project and therefore they, their dams and their lodges should simply be removed.

And what about all the other resident animals who inhabit this area? Construction is to begin in the Fall, and their displacement will occur when they may be least able to re-establish burrows, dens, sufficient food and other necessities for survival. This will be particularly true for muskrats but also for other animals. City staff did not appear to take any responsibility for the fate of the animals affected by this project, until they were challenged by the animal and environmental protection community. In fact, even as of July 24, 2012, the “Pre-qualification of contractors ...” document does not mention either beaver or muskrat or how these animals are to be handled.

Community pressure has resulted in the document tabled before the Committee, which attempts to lay out a beaver management strategy for proceeding with the Stanton Drain remediation.

Animal Alliance contacted City staff in early September, offering assistance, should the City decide to move the beavers. We talked about the plight of these animals when they are trapped and moved so late in the season. We emphasized the need to observe them after the move and to provide support throughout the winter. Finally, we offered to seek experts in the field to assist the City with the best way to proceed. We received no request for assistance.

As a result, the recommendation to engage a licensed trapper to relocate the beaver from the Stanton Drain to the Munsee-Delaware First Nation's lands speaks to a last minute, poorly planned approach. As the report states, "The Civic Administration has pursued relocation within the area but was unable to locate suitable habitat for the beavers within the Stanton Drain area." Why would the Civic Administration not seek our assistance? Moving these animals to the Munsee-Delaware First Nation's lands means that the beaver must establish their territory because there will be other beaver present, find a suitable site, build a lodge and make sure that the water is sufficiently deep to allow access and egress from the lodge when the surface is frozen and store enough food for the winter. Furthermore, if trapping occurs on the Munsee-Delaware First Nation's lands, the beaver are at additional risk of a cruel death should they survive the winter.

Recommendations

We recommend that Committee and Council:

1. Seek to protect the wetlands and waterways in and around the Stanton Drain;
2. Resolve the flooding caused by the presence of beaver through non-lethal devices such as beaver deceivers and beaver bafflers;
3. Seek an alternative arrangement should the beavers be trapped and moved, working with the OMNR and the wildlife rehabilitation community to provide sanctuary and support to these animals while they get established in their new environment;
4. Address the plight of other animals such as the muskrat;
5. Delay the Stanton Drain remediation work until a full ecosystem inventory assessment can be completed; and
6. Re-examine the method of remediation that would mitigate against the destruction of an important ecological area in the City of London.

Yours truly,



Tricia O'Brien