

May 14, 2024

Dear Members of the Town Caledon Planning and Development Committee,

My name is Brendon Samuels and I am the research coordinator at the [Fatal Light Awareness Program \(FLAP\) Canada](#). FLAP is a registered charity based out of the Greater Toronto Area specializing in raising awareness of bird safety and conservation in the built environment. I am writing to express support for the Town of Caledon Green Development Standards (GDS). I want to commend municipal staff for their work on preparing a comprehensive draft of the GDS and consulting with the community. Indeed, proactive engagement with stakeholders will be key to the success of the GDS implementation.

I strongly support the adoption of the CSA A460:19 Bird-Friendly Building Design standard within the GDS as recommended.

What is the problem?

Each year, [tens of millions of birds are killed in Canada](#) by collisions with glass on buildings. Birds do not understand the concept of reflections on glass (e.g., windows) and fail to detect glass that is transparent (e.g., balcony railings). Under the Ontario Environmental Protection Act and Canada's Migratory Bird Convention Act, it is illegal for buildings to kill wild birds, regardless of whether the harm is caused unintentionally. Buildings that kill birds and are the subject of complaints to authorities may be required to implement retrofits or face litigation. Each bird killed by a preventable collision with a building represents a loss of the services that individual would otherwise provide throughout its migratory range, including seed dispersal, pollination, and pest insect control, that are necessary for ecological and human health.

Solutions

Most bird collisions with glass occur during daytime at low-rise buildings and residences (not high-rise buildings) up to the height of the surrounding tree canopy, and risk is elevated near bird habitats and attractants (e.g., vegetated areas, bird feeders). It is therefore imperative for communities and towns with abundant natural heritage to manage their growth with bird safety in mind.

By implementing a bird safe building design standard for new construction, Caledon is demonstrating leadership and ensuring biodiversity and wildlife impacts are prioritized as part of sustainable urban design. Bird safe design typically involves minor changes to glazing on buildings, with a pattern of dense visual markers applied on the first exterior surface of glass that birds will recognize as a solid barrier they cannot pass through. Bird safe design also includes "Dark Sky" lighting criteria which limit artificial light at night from being cast into the night sky and disrupting bird migration. Budgetary impacts of using bird safe components in building construction are generally negligible. By aligning the Caledon GDS with the A460:19 standard, bird friendly design specifications will be kept consistent with those practiced by other neighboring jurisdictions, making it easier for industry to achieve compliance.

Related opportunities for a bird friendly Caledon

As you move forward with the implementation of the GDS and bird friendly building design, there may be adjacent opportunities to support the intent of the GDS to make Caledon a more sustainable and bird friendly community, particularly to encourage voluntary adoption of bird safety at existing buildings. Below I am providing a shortlist of suggestions for your consideration, with an invitation to engage further with municipal staff on any topics of interest. Many of these initiatives have already been implemented in other communities and can readily be adapted to suit Caledon's needs and capacity:

Lead by example with municipal facilities:

1. Adopt bird safe design in new and existing municipal facilities, especially buildings with uses that provide opportunities for public education such as libraries.
2. Carry out a building risk assessment of municipal facilities that are suspected to be at elevated risk of bird collisions to inform plans for mitigation and potential cost-saving.
3. Bird safety components can be included in applications to higher levels of government for funding to support climate resiliency enhancements in municipal infrastructure.
4. Bird safety can be embedded into programs for long-term infrastructure revitalization and maintenance (e.g., end-of-life window replacements during scheduled renovations) to take advantage of potential cost-savings.
5. Apply bird safe design in transportation infrastructure (e.g., new and replacement glass bus shelters) that fall outside the scope of application for the GDS through site plan control.

Capacity building

6. Provide educational for local industry (e.g., workshops) to familiarize practitioners with bird safe design as part of the GDS. Bird safety can be integrated into other architectural solutions for making buildings more resilient to climate change (e.g., solar shading).
7. Ensure that municipal staff tasked with inspections for substantial compliance with approved site plans are familiarized with CSA A460:19 specifications and able to detect common non-compliance issues.

Incentives for community uptake:

8. Explicitly embed bird safety retrofits (e.g., applications of window film) in the eligibility criteria for municipal grants and loans that support industry or community-led façade improvements or sustainability, such as through Community Improvement Plans.
9. Work with community partners to subsidize the cost of residential window retrofit supplies (e.g., markers, tape) for low-income households to remove any financial barrier to participation.
10. Ensure local retailers selling bird feeding supplies are equipped to provide clients with access to information about preventing bird-window collisions, such as by printing educational brochures.

Please do not hesitate to reach out to me if you have any questions. Thank you for your consideration of bird safety and congratulations on the completion of your Green Development Standards!

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