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and tomorrow.

November 24, 2022

Via email and upload to the Environmental Registry of Ontario

Ms. Jennifer Keyes, Director
Resource Planning and Development Policy Branch
Ministry of Natural Resources and Forestry
2nd Floor, 300 Water Street,
Peterborough, ON K9J 3C7

Dear Ms. Keyes:

**Subject: Central Lake Ontario Conservation Authority Comments for Ontario Wetland
Evaluation System
Environmental Registry of Ontario Notice # 019-6160
CLOCA File# ASLA3**

At their meeting of November 23, 2022, the Central Lake Ontario Conservation Authority (CLOCA) Board of Directors passed the following Resolution:

Res. #67 *Moved by J. Neal
Seconded by T.D Marimpietri*

THAT in response to Environmental Registry Posting ERO #019-6160, the CLOCA Board of Directors requests that the Province of Ontario not proceed with the proposed updates to the Ontario Wetland Evaluation System;

That the Commentary in Staff Report #5806-22 and attachment, be endorsed and submitted to the Province of Ontario and Conservation Ontario as CLOCA's comments regarding Environmental Registry Posting ERO #019-6160;

THAT Staff Report #5806-22 be circulated to Watershed Municipalities with a request for endorsement of this resolution; and,

THAT Staff Report #5806-22, be circulated to Members of Provincial Parliament, Members of Parliament, Conservation Ontario and adjacent Conservation Authorities for their information.

CARRIED

Accordingly, please find the endorsed staff report and attachments enclosed with this letter for detailed commentary from CLOCA.

Please contact me if you have any questions with respect to this submission.

Yours truly,



Jamie Davidson, MCIP, RPP
Director, Watershed Planning and Natural Heritage
JD/lv

Encl. CLOCA Staff Report 5806-22 and attachments


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REPORT

CENTRAL LAKE ONTARIO CONSERVATION AUTHORITY

DATE: November 22, 2022
FILE: ASLA3
S.R.: 5806-22
TO: Chair and Members, CLOCA Board of Directors
FROM: Jamie Davidson, Director, Watershed Planning and Natural Heritage
SUBJECT: **Proposed Updates to the Ontario Wetland Evaluation System**

APPROVED BY C.A.O. 

Overview

In support of their Housing Supply Action Plan 3.0 the Provincial Government has proposed changes to the Ontario Wetland Evaluation System (OWES). The proposed changes are currently posted on the Environmental Registry of Ontario (ERO #019-6160) for review and comment, and if approved, will dramatically change the way in which wetland significance status is determined, and in turn reduce the protections currently afforded to wetlands across the province, including those within the CLOCA jurisdiction. This board report:

- outlines the importance of the current OWES system in evaluating and protecting wetlands of provincial significance in the CLOCA jurisdiction,
- assesses the proposed changes and their potential impacts on wetland protection, and the potential impact on the decision makers responsible for planning matters under the proposed framework,
- provides an analysis of the potential impact that these changes will have on wetlands within the CLOCA jurisdiction if fully implemented, especially when coupled with the other significant policy changes proposed under Bill 23.

Role of OWES Under the Current Planning Framework

The OWES is a science-based ranking system developed by the Province of Ontario that provides a standardized approach to determining the relative value of wetlands. High value wetlands are provincially significant and are commonly referred to as "provincially significant wetlands" (PSW). The OWES consists of the Provincial technical manuals that are used to evaluate the significance of wetlands, and work to inform Ontario's land use planning process. The evaluation recognizes the important role that wetlands play in maintaining critical ecosystem functions, providing social benefits, moderating storm flows and flooding, improving water quality, and protecting rare species and their habitat needs. The Wetland Evaluation System is used primarily by:

- municipal governments as part of the planning process
- conservation authorities that regulate natural hazards (including wetlands) under the Conservation Authorities Act
- the Ontario government to develop and implement policy, legislation and incentive and stewardship programs.

The OWES manuals are the "evaluation procedures" used to define significant wetlands addressed in Ontario's 2020 Provincial Policy Statement (PPS), issued under the authority of the *Planning Act*. The PPS provides policy direction on matters of provincial interest related to land use planning. It sets out policies for the protection of significant wetlands and defines significant wetland to mean an area identified by the Ministry of Natural Resources and Forestry (MNR) as provincially significant based on the OWES. Protections afforded to significant wetlands are outlined in the 2020 PPS under:

- Section 2.1.4 - "*Development and site alteration shall not be permitted in a) significant wetlands...b) significant coastal wetlands.*"
- and provides further protections to lands adjacent to significant wetlands in Section 2.1.8 - "*Development and site alteration shall not be permitted on adjacent lands to natural heritage features and areas [this includes significant wetlands] ...unless...it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions*".

Quite simply, the current Provincial Policy Statement provides strong protections to provincially significant wetlands and their adjacent lands, and the Ontario Wetland Evaluation System provides the framework to designate these provincially significant natural features so that they receive the protections outlined in the PPS. As they stand now, these two provincial land use planning tools work together to protect the most significant wetlands across our landscape that according to science deliver high value ecological goods and services to our communities throughout the year at minimal cost to taxpayers.

Potential Impact to Wetlands in the CLOCA Jurisdiction

The proposed direction to evaluate wetlands as individual units along with the removal of the weighted scoring for wetland complexing and for species at risk habitat will likely result in few individual wetland units generating high enough scores through the updated evaluation system to meet provincially significant criteria. CLOCA staff undertook a high-level analysis (Table 1) of the wetlands within its jurisdiction to better understand the potential implications of the proposed changes across the CLOCA landscape.

TABLE 1

Wetland Class	Number of Individual Wetland Units / Area in CLOCA Under Current OWES	Provincially Significant Wetland in CLOCA if Re-evaluated Under Proposed OWES
Provincially Significant Wetlands	262 / 1,768 ha (includes 258 individual wetland units that make up 14 wetland complexes – 1593 ha; and 4 wetlands units that meet the significance criteria without complexing, 175 ha)	4 individual wetland units / 175 ha Only 1.5% of existing PSWs would likely maintain their designation if re-evaluated as individual wetland units (98.5% would lose their current designation)
Evaluated (not significant)	3 / 51 ha	0
MNRF Identified Wetlands (non-evaluated)	2500 / 2,880 ha (many of these wetland units are small in size, but could be designated as part of new or added to existing PSW complexes if evaluations were undertaken)	0 None of the current non-evaluated wetlands would meet provincial significance criteria is evaluated under the proposed OWES
Total Wetlands	2765 / 4,699 ha 38% of all existing wetland area in CLOCA is PSW	4 individual wetland units / 175 ha Only 3.7% of total wetland area would likely maintain the PSW designation if re-evaluated (a 10-fold decrease), leaving 96.3% of wetland area with limited policy protections

The results above suggest that the proposed changes to the OWES could facilitate the loss of provincial significance status to 98.5% of existing PSWs in the CLOCA jurisdiction, which means these wetlands will also lose the strong protections currently afforded to PSWs under the PPS. The cumulative impact of these changes together with the many other negative policy changes proposed under Bill 23 could put 96.3% of wetland area in the CLOCA jurisdiction at serious risk of degradation or complete removal.

Assessment of Proposed Changes to OWES

Staff has undertaken a detailed review of the proposed updates to the OWES evaluation system. Table 2 outlines the proposed changes that CLOCA feels will have the most significant negative impact on wetlands and their future protections should this update be fully implemented. Attachment 1 also provides further details on the comments below.

TABLE 2

Impacted Section or Subject Matter	Proposed Change	Concern with Proposed Change and Recommendations
<p>OWES program administration and oversight</p>	<p>REMOVAL - All reference to Ministry of Natural Resources and Forestry (MNRF) and its role in program oversight, administration, decision making authority on evaluations, record keeping, etc. has been struck from the manual.</p>	<p>It is unclear who will:</p> <ul style="list-style-type: none"> • administer the OWES program going forward, including training and certification oversight, • who make decisions regarding conflicting opinions, • who will administer the record keeping program for wetland evaluations, their mapping, and their final designations. <p>RECOMMENDATION: That wetlands should be managed according to watershed or provincial scales, as wetlands are not limited to municipal boundaries.</p> <p>RECOMMENDATION: That the Province consider delegating the responsibility for managing the OWES to conservation authorities in order to streamline the implementation of this important planning tool. Conservation Authorities already support their municipal partners in the local land use planning process, and have the expertise, data, and local knowledge to efficiently manage this program.</p>
<p>Removal of Wetland Complexing</p>	<p>REMOVAL – the Wetland Complexes section has been removed in its entirety, and all reference to wetland complexing has been struck from the manual (i.e., wetland complexing will no longer be required as part of the evaluation process).</p> <p>REMOVAL – all scoring related to complexing has been struck from the evaluation system.</p> <p>ADDITION – individual wetlands that are currently part of a complex can generally be re-evaluated as single wetland units and scored independently of surrounding wetlands.</p>	<p>Individual wetlands and their functions will be evaluated for individual significance without recognition of their functional relationship with other surrounding wetland features. This change incorrectly assumes that wetlands function independently of each other, which is not supported by the literature. Without the weighted scores derived from complexing wetlands in the existing framework, most individual wetlands will not meet the provincial significance criteria when evaluated on their own merits. This proposed removal is not science based and meant to intentionally facilitate the “de-listing” of significant wetlands.</p> <p>RECOMMENDATION: That complexing continue to be required as part of the wetland evaluation system.</p>
<p>Evaluations deemed complete by OWES evaluators without MNRF oversight</p>	<p>REMOVAL – MNRF no longer the final approval authority for wetland evaluations, mapping, or final designations.</p> <p>ADDITION - A wetland evaluation, re-evaluation or mapping update completed by a certified OWES evaluator will be considered complete once it has been received by a decision maker.</p>	<p>This change suggests that there is no longer an approval authority for wetland evaluations. This is unsettling as it is likely that most wetland evaluations will be undertaken by proponents of development with no checks and balances. This could be viewed as a built-in bias in favour of development.</p> <p>RECOMMENDATION: That wetland evaluations be subject to approval of either municipalities or conservation authorities.</p>

Impacted Section or Subject Matter	Proposed Change	Concern with Proposed Change and Recommendations
Change in “Decision Maker”	ADDITION – the term “decision maker” (i.e., those addressing a land use planning and development, or resource management matter (municipalities)) has been added as the ones who will be receiving wetland evaluations and mapping in lieu of MNRF.	It is unclear if “decision makers” will play a role in reviewing completed evaluations, managing evaluation records, updating provincial datasets, etc. If this is the case, municipalities do not have the current capacity or expertise for this new responsibility. RECOMMENDATION: That wetland evaluations be subject to approval of either municipalities or conservation authorities.
Reproductive Habitat and Migration, Feeding or Hibernation Habitat for an Endangered or Threatened Species	REMOVAL – Sections on Reproductive Habitat for Endangered or Threatened Species and on Migration, Feeding or Hibernation Habitat for an Endangered or Threatened Species have been removed in their entirety. All reference to Endangered and Threatened Species have been struck from the manual. REMOVAL – all scoring related to endangered or threatened species habitat have been struck from the evaluation system.	Rare and localized species tend to be more susceptible to extinction events, particularly if their specialized habitats are disturbed or lost. The current evaluation system provides high scores for wetlands where species at risk are present in order to enhance protection of the feature and its habitat. Removal of the weighted scoring for species at risk habitat through the existing framework, coupled with the removal of the scoring for wetland complexing will mean that most individual wetlands will not meet the provincial significance criteria when evaluated on their own merits. This proposed removal is not science based and meant to intentionally facilitate the “de-listing” of significant wetlands. RECOMMENDATION: That Reproductive Habitat for Endangered or Threatened Species and on Migration, Feeding or Hibernation Habitat for an Endangered or Threatened Species continue to be a part of the wetland evaluation system.
Departure from a science driven methodology	REMOVAL - Reference to the role that provincial technical working groups and the MNRF play in ensuring the system represents the best science, and their role in providing clarification to practitioners undertaking evaluations has been struck from the manual. REMOVAL – the science driven weighted scoring in favour of wetland complexes and species at risk habitat has been struck in its entirety from the manual. The remaining scoring system has not been adjusted accordingly in the proposed changes to compensate for this significant removal	Removal of the role played by MNRF and technical working groups in the management and administration of OWES means the system is no longer supported by experts in the management of wetlands and disconnected from the science. An unsupported system may become dysfunctional and add unnecessary delays to the planning process. Removal of the weighted scoring for species at risk habitat through the existing framework, coupled with the removal of the scoring for wetland complexing will mean that most of individual wetlands will not meet the significance criteria when evaluated on their own merits.

Impacted Section or Subject Matter	Proposed Change	Concern with Proposed Change and Recommendations
<p>Departure from a science driven methodology</p>	<p>ADDITION: in general, OWES is to be used as a guidance document when determining wetland significance, and professional judgement should be used to determine some aspects of the evaluation.</p>	<p>Evaluators are now being encouraged to use professional judgement, which can be biased in favour of development, in order to determine final wetland designations as opposed to the current system that leaves final vetting and decision making in the hands of MNR. These proposed removals and additions are not science based and meant to intentionally facilitate the “de-listing” of significant wetlands.</p> <p>RECOMMENDATION: That complexing and Reproductive Habitat for Endangered or Threatened Species and on Migration, Feeding or Hibernation Habitat for an Endangered or Threatened Species continue to be an integral part of the wetland evaluation system.</p> <p>RECOMMENDATION: That the Province of Ontario be requested to not proceed with the proposed changes to the OWES.</p> <p>RECOMMENDATION: That the Province work with a technical advisory committee that includes conservation authority representation to develop proposed updates to the OWES that reflect the science, protect provincially significant wetlands, and that streamline the implementation of this provincial planning tool.</p> <p>RECOMMENDATION: That the Province consider delegating the responsibility for managing the OWES to conservation authorities in an effort to streamline the implementation of this important planning tool. Conservation Authorities already support their municipal partners in the local land use planning process, and have the expertise, data, and local knowledge to efficiently manage this program on behalf of the Province.</p>

Conclusions

The collective changes proposed through this update to the OWES will significantly weaken the provincial nature and value of this evaluation framework by removing centralized oversight and consistent decision making for the program, eroding the scientific basis of the system, flippantly removing critical wetland functions and their associated scoring from the evaluation system, and placing the designation of final wetland significance into the hands of evaluators working on behalf of the development community.

On their own, the proposed changes to the OWES manual will facilitate the systematic “de-listing” of wetlands currently designated as provincially significant. Approximately 98.5% of the existing 262 provincially significant wetlands in the CLOCA jurisdiction would likely lose their PSW status if re-evaluated under the proposed OWES. Only 3.7% (a 10-fold reduction) of all wetlands within the CLOCA jurisdiction would likely continue to receive the full protections afforded to PSWs in the current PPS under the proposed evaluation system.

The remaining 96.3% of “de-listed” wetlands would no longer be afforded the strong protections outlined in the current Provincial Policy Statement and other complimentary policy.

The proposed changes will ultimately place the final burden of decision making around wetland significance and protection onto “decision makers” (presumably municipalities) who do not have capacity for this new responsibility. These significant changes could have unintended consequences that disrupt the planning process and delay planning approvals. This, coupled with the other cumulative impacts to municipalities, conservation authorities, and other provincial policy proposed under Bill 23 will ensure that the majority of wetlands across our landscape, including those most significant to our communities, will be extremely at risk of degradation or complete removal. This proposed shift in policy by the Province does not align at all with responsible watershed planning, or with the goal of achieving complete, liveable communities.

RECOMMENDATION:

THAT in response to Environmental Registry Posting ERO #019-61, the CLOCA Board of Directors requests that the Province of Ontario not proceed with the proposed updates to the Ontario Wetland Evaluation System;

That the Commentary in Staff Report #5806-22 and attachment, be endorsed and submitted to the Province of Ontario and Conservation Ontario as CLOCA’s comments regarding Environmental Registry Posting ERO #019-6160;

THAT Staff Report #5806-22 be circulated to Watershed Municipalities with a request for endorsement of this resolution; and,

THAT Staff Report #5806-22, be circulated to Members of Provincial Parliament, Members of Parliament, Conservation Ontario and adjacent Conservation Authorities for their information.

Attachment 1: Memo from Watershed Planning

JD/lv

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Memo from Watershed Planning

Date: November 1, 2022
To: Chris Darling
From: Jamie Davidson

File:
Cc: Kathy Luttrell, Alex Kissel
Subject: Proposed Provincial
Policy Review

Materials Reviewed: *Proposed Updates to the Ontario Wetland Evaluation System 2022-10-25 (ERO 019-6160)*

The following comments were generated after a thorough review of the “Proposed Updates to the Ontario Wetland Evaluation System 2022-10-25” document by Watershed Planning and Natural Heritage staff.

Introduction to the Evaluation System

1. *“To aid in identifying those wetlands that have value at a provincial scale, MNRF has developed, ~~and administers,~~”*
 - MNRF has been struck out throughout the introduction and the rest of the manual. Who will be left in charge of administering this provincial evaluation system if the provincial ministry with the mandate for “protection and sustainable management of the province’s natural heritage features, including wetlands” is no longer administering it?
 - Who will oversee the OWES evaluator training and certification process?
 - In the cases where the reference to “contact the MNRF for further details”, does the removal of these lines mean that practitioners cannot contact MNRF for these details, or are they still able to contact them? Clarification required.
2. *“As areas where land and water come together, wetlands provide unique and specialized habitat for a great variety of species that can live nowhere else. If wetlands small and large cannot survive in reasonable abundance across the landscape, their dependent species will decrease in number and eventually disappear. **The survival of wetlands helps to preserve ecological processes and functions that secure and protect the quality of the biosphere in which humans and other organisms together must dwell... the evaluation system is based on scientific criteria, ...”***
 - This section speaks to the importance of wetlands to support valuable ecosystem services and that both small and large wetlands need to be maintained across the landscape if we are to maintain wetland dependent species. The proposed changes to OWES do not appear to be supported by science and will erode decision makers abilities to protect wetlands and their functions.
3. *“~~2. By the province as an aid to land use planning. In this regard, the wetland evaluation system serves as an essential cornerstone of wetland policies of the Provincial Policy Statement, authorized under Section 3 of the Planning Act. As well, the evaluation system may prove of value in identifying nationally and internationally important wetland features.”~~*
 - How is the OWES planning tool that is currently seen “as an essential cornerstone of wetland policies of the PPS” no longer seen as such by the Province according to the proposed changes to the OWES methodology. The erosion of the OWES coupled with other proposed change to other planning policy being introduced under Bill 23, including a potential weakening of the PPS, will erode decision makers abilities to protect wetlands and their functions.

4. 3. ~~“By conservation authorities as an aid in implementing regulations under the Conservation Authorities Act. Conservation authorities for purposes of public safety, natural hazard prevention and management, regulate wetlands for flood attenuation, natural storage capacities and for preventing shoreline erosion. Conservation authorities also regulate areas around wetlands that may interfere with the hydrologic function of the adjacent wetland including in general areas within 120 metres of all PSWs and areas within 30 metres of all other wetlands. Many conservation authorities evaluate wetlands; MNR retains authority to identify PSWs.”~~
- Why is this section being struck out when even if the proposed changes to the CAA under Bill 23 are implemented in full, conservation authorities will continue to focus on natural hazards management and require tools and data to support this work (including information generated through OWES).

How the Scoring System Works

1. ~~“The judgement of the Wetland Evaluation Technical Team (WETT), the Southern Wetlands Evaluation Review Committee and the Provincial Wetlands Working Group is the basis for the relative weighting.... If an evaluator is uncertain how to proceed with or interpret any component of this evaluation system, they should contact the appropriate MNR District Office for clarification.”~~
 - This strikeout suggests that the scientific approach to supporting decision making within the OWES is being weakened or removed from the framework.
 - Who are evaluators expected to work with to address any uncertainties with the OWES methodology or with the data they are generating if MNRF are longer able to provide support?
 - There are multiple instances where evaluators are told to use “professional judgement” to determine some aspect of the evaluation. If there is a disagreement between two evaluators, who is responsible for making the final decision? In the past it has been the MNRF, but this has been removed from their responsibilities.
2. ~~“This manual sets out guidance for assessing wetlands. Evaluators should rely on their observation, data collection and research and use their professional judgement and expertise in applying the OWES.”~~
 - The use of the term “guidance” suggests that this OWES methodology is no longer the primary tool for determining provincial significance and that other factors outside the framework can be considered when determining significance.

Wetland Re-evaluations and Mapping Updates

1. ~~“Re-evaluation of previously evaluated wetland complexes: With the exception of closely grouped wetlands, single wetland units that are part of a previously evaluated wetland complex can be re-evaluated (re-scored and re-mapped) without requiring a complete re-evaluation of all units in the existing wetland complex. Each previously evaluated wetland unit will retain its current status (e.g., significant or not) until such a time as the individual unit may be evaluated. All wetland units that were previously evaluated as part of a wetland complex do not need to be re-evaluated at the same time. There is no requirement to update the wetland evaluation that applied to an entire wetland complex. The evaluation is considered a point-in-time document used to assign status (significant or not) to each wetland that the evaluation covered (i.e., all wetland units that had previously been complexed together). Previous wetland evaluation documentation can be used as a source of information when re-evaluating a formerly complexed wetland unit.”~~
 - “with the exception of closely grouped wetlands” – this needs to be defined. This might be defined later in section Wetland Edges Bordering on Lakes and Rivers assuming if this definition is also meant to apply to wetlands other than just those bordering lakes and rivers? Clarification is required.

- Individual wetlands will be evaluated for individual significance without recognition of the landscape within which they lie. This change incorrectly assumes that wetlands function independently of each other, which is not supported through the literature. Without the additive value derived from complexing wetlands through the existing framework, the vast majority of wetlands on their own will not meet the significance criteria when evaluated on their own even though they function intimately with other surrounding wetlands that collectively provide significant ecological functions and services. Suggests that this proposed removal is not science based and meant to intentionally facilitate the “de-listing” of significant wetlands.

A complete Evaluation

1. *“A wetland evaluation, re-evaluation or mapping update will be considered complete once it has been received by a decision maker addressing a land use planning and development or resource management matter.”*
 - This proposed addition seems to suggest that an evaluation, re-evaluation or mapping update are considered complete and final?? simply after being received by a decision maker. Is there no vetting required by the decision maker to ensure that the evaluation was completed properly and ethically? Because there is no professional body in Ontario under which ecologists and biologists (the professionals who are most likely to carry out evaluations in the future) operate, there will be no professional ethical standards guiding the consulting ecologists and biologists who will be retained by developers to complete this work. There needs to be a vetting process for evaluations, as evaluators working on behalf of developers will be biased in their work just as some are now under the current planning system. Luckily, the current system provides appropriate scrutiny of developer supported studies and reports by competent/qualified plan reviewers at conservation authorities and to a lesser degree by municipal planning staff.
 - If the “decision maker” becomes responsible for vetting evaluations, this will add both an administrative and financial burden onto these decision makers.
 - There is no indication that the MNRF will no longer be responsible for updating and maintaining the provincial wetland database and mapping information on LIO, and therefore once wetland evaluations are completed and “approved” (it is unclear who administer and makes decisions about evaluations), is it safe to assume they will still be submitted to the MNRF for inclusion in the database? Considering that all wetlands are eligible for re-evaluation at any time, and that the MNRF no longer administers the evaluations, is the current status of a wetland what is shown in the provincial database, or does the status change as soon as someone completes an evaluation? Clarification is required.

The Wetland Evaluation File

1. This entire section has been removed.
 - Who will be responsible for maintaining a comprehensive record of significant wetlands if MNRF no longer participates in this process? Wetlands are not limited to municipal boundaries and are more reflective of a watershed or provincial scale.
2. In the Maps to be Prepared and Included in the Wetland Evaluation section, subsection 3 “Catchment Basin Map” the line *“This map will be used to determine scoring....”* has been removed.
 - If practitioners cannot use the catchment basin map, how are they to determine the scoring in the hydrological section? Clarification required.

Field Visits

1. *“While only a trained wetland evaluator can undertake an evaluation”*
 - Who will be ultimately responsible for training programs and certifying evaluators in future if MNRF is being removed from any administration of the OWES framework? Program guidance and administration of the certification program from MNRF is still critical going forward even if the University of Nipissing continues to deliver the training on behalf of the Province.

Wetland Complexes

1. This section has been removed in its entirety, and all references to complexing have been removed from the document.
 - Individual wetlands will be evaluated for individual significance without recognition of the landscape within which they lie. This change incorrectly assumes that wetlands function independently of each other, which is not supported through the literature. Without the additive value derived from complexing wetlands through the existing framework, the vast majority of wetlands on their own will not meet the significance criteria even though they function intimately with other surrounding wetlands that collectively provide significant ecological functions and services.
 - Removal of the need or ability to complex wetlands for the determination of significance suggests that this proposed removal is not science based and meant to intentionally facilitate the “de-listing” of significant wetlands.

4.1.2 Species

2. *“Whatever the causes of rarity, rare species are almost universally considered to be important and worthy of protection. Rare and localized species tend to be more susceptible to extinction events than are common or more widely distributed species.”*
 - The document continues to reinforce the value of wetlands to support rare species given they tend to be more susceptible to extinction events. If this is the case, why are the proceeding sections that speak to scoring of species at risk completely removed from OWES under the proposed changes. Suggests that this proposed removal is not science based and meant to intentionally facilitate the “de-listing” of significant wetlands.

4.1.2.1 Reproductive Habitat for Endangered or Threatened Species and 4.1.2.2 Migration, Feeding or Hibernation Habitat for an Endangered or Threatened Species

1. These two sections have been removed in their entirety.
 - The document continues to reinforce the value of wetlands to support rare species given they tend to be more susceptible to extinction events. If this is the case, why are the proceeding sections that speak to scoring of species at risk completely removed from OWES under the proposed changes. Suggests that this proposed removal is not science based and meant to intentionally facilitate the “de-listing” of significant wetlands.
2. In section 4.1.2.5 and 4.1.2.6, the references to species lists collected by MNRF is removed, however the evaluators are told to look in Appendix 6 for options for species lists, which then include the previously removed MNRF records.
 - Are these species lists to be used or not? Clarification required.
3. Sections 4.2.2 – 4.2.5 now instruct evaluators to use Significant Wildlife Habitat criteria to determine if these features are present and provincially significant.
 - How are Nationally/Internationally, Significant in Ecoregion, Significant in Ecodistrict, and Habitat Suitable to be determined? Clarification required.