

Ausable Bayfield Conservation Authority comments regarding the proposed updates to the Ontario Wetland Evaluation System

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Proposal posted: October 25, 2022

Comment period:

October 25, 2022 - November 24, 2022 (30 days)

Background from [Proposed Updates to the Ontario Wetland Evaluation System | Environmental Registry of Ontario](#):

Under Ontario's current policy framework, an evaluated wetland is a wetland that has been assessed according to the Ontario Wetland Evaluation System (OWES).

The OWES is the official procedure to:

1. determine the wetlands that are significant
2. determine the boundaries of significant wetlands

The OWES assesses wetlands under four categories: biological, social, hydrological and special features. OWES defines a significant wetland as any evaluated wetland that scores 600 or more points in total, or that scores 200 or more points in either the biological component or the special features component.

The OWES consists of two manuals: the Southern OWES (used to evaluate wetlands located in Ecoregions 6 and 7) and the Northern OWES (used to evaluate wetlands located in Ecoregions 2, 3, 4, and 5). Coastal wetlands are also evaluated using these OWES manuals.

The OWES has been in place since 1983. Over the last decade in particular, we have heard practitioners voice concerns and recommendations for improvements to how Ontario's significant wetlands are assessed and identified.

Ausable Bayfield Conservation Authority (ABCA) comment: We did have comments in 2018 about the lack of clarity and consistency around the various definitions of wetlands from the Conservation Authorities Act, the Provincial Policy Statement and the OWES. We were hoping that further policy development would strengthen not lessen this guidance. In particular, we were concerned that the OWES definition made for less protection of smaller wetlands (i.e., wetlands <2 ha).

Proposed changes

On October 25, 2022, the Ministry of Natural Resources and Forestry (MNRF) proposed the following changes to content in the OWES manuals:

1. add new guidance related to re-evaluation of wetlands and updates to mapping of evaluated wetland boundaries
2. make changes to better recognize the professional opinion of wetland evaluators and the role of local decision makers (e.g. municipalities)
3. other housekeeping edits to ensure consistency with the above changes throughout the manual

from : [Proposed Updates to the Ontario Wetland Evaluation System | Environmental Registry of Ontario](#):

Re-evaluation of wetlands - ABCA comment:

The wetland layer for the Ausable Bayfield watershed has undergone an extensive review since 2018. The ABCA has spent considerable time updating the wetland boundary mapping.

We continue to lose small wetlands with agricultural drainage and urban development. Since 2018, smaller wetlands have been removed from the OWES definition. In previous editions of the OWES some of the smaller wetlands might have had protection under the definition of a wetland complex. Although, this was problematic as not all wetlands have a 'surface watercourse connection' (i.e., the hydrological connection may be underground); wording around wetland complexing is being removed from the Proposed Updates to the Ontario Wetland Evaluation System 2022-10-25.

In the previous edition of the OWES, a wetland complex was defined as: A group of wetland units that are functionally linked to one another. The outer boundary of any one unit is no more than 750 m away from the outer boundary of one or more other units in the complex.

The wording on p. 20 of the Proposed Updates to the Ontario Wetland Evaluation System 2022-10-25. for "grouped" wetlands:

There are some cases where very closely grouped wetlands function together as one.

For example,

- *areas comprised of very closely spaced small wetland ponds/pools (e.g., within 30 metres from each other) interspersed with small pockets of upland forest (e.g., a 'mosaic wetland' or a 'slough wetland')*
- *wetlands along a river of lake that are separated by 100 feet or less*

Due to their unique nature, these types of wetlands are to be evaluated as one wetland under OWES (e.g., small individual wetland ponds are not to be evaluated separately).

Please provide scientific rationale for the change that originally recognized complexed wetlands with features 750 metres apart to those same features now needing to be only 30 metres apart.

Wetlands are complex and can have many social, biological and underground hydrological connections beyond the 30 metres to other wetlands. Typically, headwater wetlands are small and multiple and over a larger area. The proposed changes to make these wetland groups smaller and cutting off connections to other wetlands will compromise the million-dollar function and value these wetlands provide (Moudrak, N.; Hutter, A.M.; Feltmate, B. 2017. When the Big Storms Hit: The Role of Wetlands to Limit Urban and Rural Flood Damage. Prepared for the Ontario Ministry of Natural Resources and Forestry. Intact Centre on Climate Adaptation, University of Waterloo.). The proposed change to re-evaluating a single wetland unit separate of the whole functioning wetland system is not taking into consideration the full function and value and undermines the wetland, resulting in less protection.

The changed wording from 'complexed' to 'grouped' will clearly not provide the same level of protection as previously provided to wetland complexes.

The proposed changes remove the review of different mapping sources i.e., historical black and white images, ELC, DEM and contours, soils mapping (page 12) which help to give the evaluator more information on the wetlands. In a dry year, an evaluator may evaluate less wetlands than what is there during more typical conditions. Evaluators need additional information to make informed decisions.

On page 14 in the field visits section, 'an appropriate time of the year' is vague. Please replace with 'multiple site visits from late spring through to early fall'. Multiple site visits are required to document bird and different vegetation communities.

Wetland Evaluators - ABCA comment:

In the Proposed Updates to the Ontario Wetland Evaluation System 2022-10-25, OWES evaluations are provided to decision makers addressing land use planning, development and resource management matters. The ministry has determined that a wetland is provincially significant when it has been identified as such using this manual.

In the past OWES manual, the determination of whether a wetland is provincially significant is based on an OWES evaluation that has been approved by MNRF.

The MNRF has highly trained and skilled Biologists. This organization has been reviewing wetland evaluations since at least 1982, when the current process was standardized. Removing the MNRF from the review and confirmation of wetland evaluation results will weaken the assessment and the evaluation results will be inconsistent.

The proposed wetland evaluation, re-evaluation or mapping update that will be considered 'complete' once it has been received by a decision-maker addressing a land use planning and development or resource management order (page 8) has the potential to be biased towards shorter-term economic gain for Municipalities at the expense of longer-term environmental issues that also come with unforeseen economic costs.