Comment on Proposed Changes to the Wetland Evaluation System

I vigorously oppose the proposed changes to the Wetland Evaluation System for several reasons, all bearing on the damage to wetlands that will not be easily reversible. First, I am aware of the essential role of wetlands in providing protection against flooding, amongst other vital services. I have personally witnessed torrential rains wipe out the possibility of a normal morning commute on the Don Valley Parkway near our home in Toronto in 2013. Thirty-year veteran police officers had never seen water cresting so high. 1400 passengers had to be rescued from a commuter Go train that got stranded in storm water 15 minutes after leaving Union Station. Homeowners took a beating with flooded basements, sewer problems and other issues. Nor have I forgotten driving through flash floods in the High Park and lakeshore area of the city in 2020. The 50-70 mm of rain delivered by a sudden wild storm while I was at the dentist almost equalled what Toronto normally got in the month. I am aware of the critical role of the TRCA, the creation of the Conservation Authorities Act to deal with water and watershed issues province-wide, and the place of preparedness among our city’s top priorities. Why move in the opposite direction when COVID has taught the need for broader vision and the need for science-based decision-making?

It is important for wetland evaluations to be reviewed by arm's length agencies with an objective view. The proposed legislation is not allowing the Ministry of Natural Resources or Conservation Authorities to review wetland evaluations, leaving it to municipalities. If they are responsible for development, as well as preserving natural heritage like wetlands, where do they find balance? Many wetlands cross municipal boundaries. How will the different municipalities determine the level of importance for the wetland?

Secondly, I am aware that proposed changes will not allow wetlands to be grouped together, so that smaller wetlands will most likely not meet the criteria to be provincially significant and may be open for development. But groupings are important for fish and wildlife that live in wetlands, as the entire complex makes up their habitat. I am personally aware of the work that has gone into bringing back viable, sustainable and ecological wetland communities near my home, and I am appalled by the prospect of their destruction, and the discouragement of similar projects for the common good.

Thirdly, I am aware that wetlands are the worst place to build, beyond ecological considerations. Damage to diverse and delicate ecosystems that provide important habitats for plants and animals, for the sake of development that is vulnerable to flooding and housing that contributes to sprawl rather than intensification, is reckless and ethically unacceptable.