Comments Re: Proposed Updates Wetland Evaluation

Specific updates and accompanying comments

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| OWES Change | Pg | Comment |
| MNRF has developed, and administers | 3 | Who is going to administer the OWES…? |
| ~~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.~~ | 5 |  |
| …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. | 7 | This statement expresses superficial understanding of what a wetland complex is. If brick-and-mortar thinking is required here, then think of a wetland complex as an infrastructure for critical ecological services, e.g., runoff and flood control, filtering of excess nutrients and pollutants. To reassess one wetland unit with the possibility of removal is equivalent to removing a hydro substation or transformer, or removing a set of water mains that supply potable water to households. This mindset makes broke, more broke and more expensive to mitigate. The scenario given in the update is a costly misrepresentation of the values of wetlands. |
| Evaluations are point-in-time assessments to determine a wetland’s status (significant or not) and are not to be ‘updated’. At times decision makers may require a re-evaluation of the wetland to confirm its status. | 8 | An ‘evaluation’ is not an ‘assessment’. These are quite different things. The former implies value analyses, the latter is a data collection and profile based on a set of criteria. The human values we express regarding wetlands, and what have been scientifically shown to be critical, as contributors to flood management, pollution control, human health and well-being. What should be updated is the rigor and criteria not to include wetland units. |
| ~~The evaluation is conducted at a point in time. Hence, it is the conditions described and facts noted at that time that are assessed within the context of all available information. the evaluation always remains as an open file, subject to change as more information becomes available or as a consequence of changes to the wetland itself. Where information is not available, this should be noted; the WEDSR should be updated as information becomes available, making certain that all copies of the evaluation are simultaneously updated as well.~~ | 15-16 | This section represents transparency, a belief in open data, conduct of the process so due diligence is implemented. Why was this section removed? |
| Contour information is available on all OBM mapping and is most useful in physiographic areas of Ontario with relatively significant relief… | 19 | If anything of the OWES manual needed to be updated, it seems like this description should have been a simple task. OBM’s (paper and digital copies) exist now in the Ontario Archives, so only there publicly available. Contours are available as a Land Information Ontario spatial data class through the Provincial Open Data GeoHub website. Should the author of these manual updates feel embarrassed by this oversight, or do they just not care? Both undermine the credibility of these changes. |
| wetlands along a river of lake that are separated by 100 feet or less | 20 | …were these changes proofread? There is a typo in this statement: “…along a river *or* lake…”. Is this another expression of an attitude that says: “don’t care”? |
| ~~In the case of wetlands that are one contiguous area, this variable pertains to all wetlands within 4 km. in the case of wetland complexes, proximity pertains to the distance from the outer boundary of the wetland complex to the closest adjacent wetland and not to units within the wetland complex.~~ | 38 | So much effort has been made to remove the concept of wetland complex in these updates, for reasons that are not clear and what appears to be an additional level of complexity and even bureaucracy to evaluating wetlands. Removing this proximity scenario seems to then require that each wetland unit be evaluated according to proximity, rather than a complex that has been defined as ecologically and hydrologically integrated. Again this undermines the credibility of these changes and any rationale for streamlining the process rationale and coherent land-use planning. |
| Method for calculating Interspersion: 1. Determine the longest distance between outside boundaries of a wetland ~~a single wetland or wetland complex~~, i.e. find the widest portion of the wetland. This may require several measurements and comparisons. Draw a straight line between the two outer most points of the wetland. | 39 | Same comment about this strikethrough here of wetland complex as in the previous comment. |
| ~~Locally Important Wetlands………..~~ | 63 | The strikethrough of this whole section is disturbing. It undermines a consistency in approach by the Province to support and encourage municipalities to manage their wetlands for the values stated: ground water discharge; hydrology; social value; and aboriginal values/cultural heritage. Local definition is important but the evaluation process and rationale to have these values expressed throughout the Province should be consistent. A wetland doesn’t less a functional value for land-use planning purposes in one location compared to another. This notion of conservation authorities working in conjunction with municipalities is the critical mechanism in our Province now to uphold consistency of scientifically- and expert-based management of the wetland and waterway resources. |