

November 24, 2022

MNRF – PD – Resources Planning and
Development Policy Branch
300 Water Street, 2nd Floor, South Tower
Peterborough, ON
K9J 3C7
Canada

ERO 019-6160

Attention: Public Input Coordinator

RE: Proposed Updates to the Ontario Wetland Evaluation System

On behalf of the City of Barrie's Business Performance and Environmental Sustainability Department, we respectfully submit the following response to the Ministry of Natural Resources and Forestry Environmental Registry Posting Number 019-6160. The notice was posted on October 25, 2022, for a 30-day review period. City staff have undertaken a review of the proposal details and would like to provide the following comments and concerns.

The proposed changes and subsequent implications to the City's obligations under the Clean Water Act, Environmental Protection Act and Lake Simcoe Protection Act unclear at this time and as such, changes may impede the City's ability to comply with its legal obligations. There are also concerns relating to the unknown risks for protecting the City's sources of drinking water, natural assets and protecting our communities from flood risk.

The City's comments and concerns related to the proposed amendments are as follows:

- The "Decision Maker" as described in the proposed updates to the Ontario Wetland Evaluation System is not defined, for example:
 - Roles, responsibilities, and expectations are not made clear within the document (i.e., Municipalities)
 - It is unclear as to what the obligations are, under other Acts, that the "Decision Maker" must consider when reviewing evaluations (e.g. Environmental Protection Act, Species at Risk Act)
- Wetlands provide essential services to communities. Changes that fragment the holistic approach to wetland management undermine the ability to ensure that the resiliency and the water quality benefits provided are retained

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- The updates proposed may pose a risk to wetlands and make it easier to downgrade and/or not evaluate as significant. Impacts of re-evaluating a historically significant wetland to a non-significant wetland poses the risk of such land being developed, with the following potential impacts occurring due to development:
 - The resulting water displacement would impact drainage systems with respect to quality and quantity (e.g., infrastructure capacity, erosion, silt/sediment loading, assimilative capacity), as well as increase the risk of flooding and the cost to taxpayers
 - Flooding has the potential to impact adjacent/surrounding development
 - Building on wetlands require deep foundations and permanent dewatering which has the potential to impact the municipal aquifer and associated drinking water quality
 - A risk of non-compliance with the Lake Simcoe Protection Act with respect to phosphorus loading
 - Thermal impacts resulting in poor water quality
 - The filtering capacities of wetlands affecting water quality
 - Fill management concerns with the movement of excess soil and associated challenges like siltation of waterways through spills, the deposition of contaminated fill, and GHG emissions through transport.
- Removal of section 4.1.2.1 and 4.1.2.2 will undermine the protection of threatened and endangered species and result in an overall loss of biodiversity
- Removal of “Locally Important” Wetlands may negate the social, environmental, and economical benefits to neighborhoods and communities
- Removal of “Locally Important” Wetlands may pose negative impacts to the water quality within our watershed

Should you have any questions, please contact the undersigned at 705-739-4220 x 6140 or Sandra.Brunet@barrie.ca.

Kind regards,

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Sandra Brunet, BSc.,

Associate Director, Business Performance and Environmental Sustainability

cc: Bala Araniyasundaran, City of Barrie (GM of Infrastructure & Growth Management)
Katie Thompson, City of Barrie (Risk Management Official – BPES)
Bridget Mitchell, City of Barrie (Supervisor of Environmental Compliance – BPES)

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