

Memo

To: Ministry of Natural Resources and Forestry

From: Planning, Development and Building Services, Legal and Finance
Departments, Town of Oakville

Date: November 23, 2022

Subject: ERO number 019-6160 Proposed Updates to the Ontario Wetland Evaluation System

Comments

The Town of Oakville is aligned with the province's goal of building 1.5 million homes over the next 10 years. The town also supports the purpose and intent sustaining the province's land use planning framework exemplified in the *Planning Act* and the 2019 Growth Plan, including the:

- protection of ecological systems, including natural areas, features and functions
- conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;
- integrated planning, adequate provision and efficient use of communication, transportation, sewage and water services, waste management systems and public service facilities;
- orderly development, protection and achievement of safe, healthy & complete communities;
- adequate provision of a full range and mix of housing, including affordable housing with the prioritization of intensification in strategic growth areas;
- protection of the financial and economic well-being of the province and its municipalities;
- promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians; and
- integration of climate change considerations into land use planning and growth management

Land use planning for growth and development that supports economic prosperity, protects the environment and helps communities achieve a high quality of life remains pivotal for the Town of Oakville and the Province of Ontario.

In the context of the provincial interest from the *Planning Act* for the “protection of ecological systems, including natural areas, features and functions” could the province clarify how the proposed changes to remove wetland complexing will be balanced with protecting systems?

The proposed changes will shift responsibilities from Conservation Authorities onto Municipalities. Could the province clarify the continued role of Conservation Authorities in the process of wetland evaluation?

Similarly, could the province also clarify what roles and responsibilities might be coming to the town regarding the provision of wetland evaluation services, especially if the Ministry of Natural Resources and Forestry is no longer the approval authority?

Wetland evaluation is currently undertaken by Conservation Authority staff who have an appropriate level of expertise and knowledge. This capacity is currently not available at the town.

If the responsibility to review wetland evaluations is delegated to the local municipalities, will the municipality have the authority to review and approve the wetland evaluations?

Can the province clarify what is meant where it notes that a wetland evaluation is considered "complete", when it is "received" by a planning authority?

If the wetland evaluator is that who is undertaking the review of the wetland, how will the municipality ensure objectivity and accuracy of the wetland evaluation?

In the context of shifting responsibility to municipalities, could the province clarify how wetlands would continue to be protected and potential environmental consequences avoided?