



Date: November 22, 2022

To: The Environmental Registry of Ontario

Topic: 019-6160 Proposed Updates to the Ontario Wetland Evaluation System

From: **Climate Network Lanark**

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Position Statement

- Climate Network Lanark urgently requests that the Ontario Government withdraw Bill 23, *The More Homes Built Faster Act*, as it does not address the real housing issues in Lanark County and area, and, as it undermines the wetland evaluation system — an important tool in protecting and restoring wetlands.

Wetlands Address Climate Change and the Loss of Biodiversity

- Lanark County is home to one of the last large collections of wetlands in Southern Ontario. We have a special responsibility in Lanark County to hold and protect these vast wetlands as part of our responsibility to cut our Greenhouse Gas emissions.
- Wetlands store 1,200 tonnes/hectare of carbon (Department of Earth Sciences, University of Toronto, 2018). Developing wetlands releases stored carbon dioxide, *increasing* GHG emissions and making it harder for municipalities, the province and Canada to achieve our GHG reduction targets and forcing other sectors to make more intense cuts in their GHGs.
- Wetlands provide significant ecological services; the estimated total value of ecosystem services they provide in rural areas is \$15,171/ha/yr. (2008 CAD\$; from *Estimating Ecosystem Services in Southern Ontario*, Ontario Ministry of Natural Resources 2009). They protect against flooding, a frequent and growing result of climate instability. This in turn protects taxpayers and municipalities from increasing costs.
- **Releasing stored carbon from wetlands would accelerate deadly climate change.**

Proposed Changes to the Wetland Evaluation System Would Threaten These Important Natural Systems

- Replacing the Provincial Policy Statement, which currently requires natural heritage systems planning, would weaken protections for Ontario's farmland and natural heritage, including Provincially Significant Wetlands, woodlands and wildlife habitat.

- The proposed changes to the Ontario Wetland Evaluation System for identifying Provincially Significant Wetlands (PSWs) would result in very few wetlands being deemed provincially significant in the future. Specifically, species-at-risk and wetland complexes are key criterion in determining provincial significance and should not be removed from the evaluation process.
- Many if not most existing PSWs could lose that designation because of the proposed changes, and if so, would no longer benefit from the high level of protection that PSW designation currently provides.
- The proposed offsetting policy to compensate for the loss of wetlands, woodlands and other natural areas as a result of development is untenable. Offsetting involves extremely risky trade-offs, where existing natural areas are sacrificed on the premise that they can be recreated or restored elsewhere. The loss is certain, while timely compensation is anything but guaranteed. In fact, over 30 years of experience with wetland offsetting in the United States, Canada and elsewhere indicates that offsetting is seldom successful in fully compensating for the loss of wetland area, functions and values. The very possibility of offsetting is likely to push the flood gates of destruction wide open, especially since the proposal includes a “pay to slay” natural heritage compensation fund. Developers would be allowed to destroy wetlands, woodlands and other wildlife habitats as long as they pay into the fund.
- The proposed removal of provincial government oversight of the evaluation process would mean there is no central agency assigned to coordinate or approve evaluations or ensure that information on PSW designations is available to the public.

Climate Network Lanark

- The Mission of Climate Network Lanark (CNL) is to build community to tackle deep action on the climate crisis in Lanark County and Smiths Falls.
- CNL represents 1,000 individuals, business leaders and municipal councillors.
- With municipalities directly or indirectly controlling 50% of greenhouse gas emissions in Canada, CNL recognizes and honours the key role that municipalities play in addressing the climate crisis.
- CNL has played a key leadership role in working with the County and its lower-tier municipalities to develop a robust community Climate Action Plan.
- All actions in the County’s Climate Action Plan are designed to support “smart” development — development that doesn’t destroy wetlands and forests, is more dense and within town boundaries.
- CNL, working with the County and local conservation authorities, brought the Alternative Land Use Services program to Lanark; ALUS supports farmers to undertake environmental projects thus protecting farmland while addressing environmental issues.