

Public Input Coordinator
MNRF - PD - Resources Planning and Development Policy Branch
300 Water Street, 2nd Floor, South tower
Peterborough, ON
K9J 8M5

November 23, 2022

RE: Proposed Updates to the Ontario Wetland Evaluation System (ERO#019-6160)

To Whom It May Concern:

Thank you for the opportunity to provide comments on the “Proposed Updates to the Ontario Wetland Evaluation System” ([ERO#019-6160](#)).

Kettle Creek Conservation Authority (KCCA), is one of 36 conservation authorities (CAs) in Ontario which deliver programs and services that protect and manage water and other natural resources in partnership with a variety of stakeholders, including government, landowners, and other organizations. In 2011, CAs developed a standardized method of reporting on the health of the natural resources within watersheds known as Watershed Report Cards. These reports provide a better understanding of local environmental issues helping to guide the best use of resources and can track progress over time.

KCCA’s 2018 Watershed Report Card provided details on the state of wetland cover in the Kettle Creek Watershed. Only 1.34% of the entire Kettle Creek watershed is wetland habitat – earning an “F Grade” – emphasizing how devastating historical human impacts, such as development activities and agricultural practices have had on wetland cover.

Wetlands have many ecological benefits, but wetlands also provide flood and drought mitigation making them important tools in climate change mitigation. KCCA’s watershed is characterized by flash floods and highly erosive characteristics. Rain events in the upper reaches of the watershed can reach Lake Erie within 12 hours, deeply cutting valleys and eroding the landscape as it rushes through the system. The flashy nature of the watershed is only worsening.

Wetlands hold significant volume of snow melt and rain which reduces flood levels during spring runoff and storm events. They also release this water slowly throughout the rest of the year, helping augment water levels in lakes and rivers during low flow periods which reduces drought conditions. Consequently, KCCA works with landowners to maintain and enhance the amount of wetland cover in the watershed – in an effort to increase flood capacity and retain water on the land during drought conditions.

Every wetland in the watershed is a valuable and essential piece of green infrastructure, with the potential to mitigate the effects of climate change. For these reasons, land use planning tools such as the Ontario Wetland Evaluation System must remain robust and comprehensive to provide the best available information to municipalities, the province and conservation authorities. Likewise, the wetland

evaluation framework must continue to ensure that wetlands which are provincially significant are protected and evaluations of all wetlands remain robust and accessible.

Consequently, KCCA supports Conservation Ontario's comments on this posting. Specifically, KCCA recommends that the section of the OWES Manuals titled "Wetland Complexes" as well as all references to wetland complexes/complexing be retained. KCCA also recommends that the proposed "Re-evaluation of previously evaluated wetland complexes" be amended to state that re-evaluation of wetland complexes may only occur through a complete re-evaluation of all units in the existing wetland complex, and that the status of a wetland complex (e.g., significant or not) may only change based on a re-evaluation of the complete wetland complex (i.e., all units that were previously evaluated as part of the wetland complex must be re-evaluated at the same time). Very small wetlands that work together as a complex can provide habitat for wildlife or serve other important ecological, hydrological, hydrogeological or social functions.

Wetland complexes are interconnected wetlands that work in concert. Separating them would impact the whole. In the Kettle Creek watershed, 70% of provincially significant wetlands are "wetland complexes". Without the ability to define them as complexes many of these wetland features may be lost to development pressures and/or agricultural expansions. With just 1.34% wetland cover, the watershed cannot afford to lose any of its existing wetlands. Strong and resilient natural ecosystems help us adapt to many different challenges including the impacts of climate change, rapid urbanization, threatened biodiversity, and increased pollution.

KCCA encourages the province to pause implementation of the proposed changes to OWES Manuals and conduct meaningful consultation with stakeholders to ensure the proposed changes do not irreparably harm natural infrastructure that is integral to local efforts to combat the impacts of a changing climate including flooding and erosion.

Sincerely,

A handwritten signature in black ink, appearing to read "Alison Warwick". The signature is fluid and cursive, with the first letter 'A' being particularly large and stylized.

Alison Warwick
Chair, Kettle Creek Conservation Authority