

**A2A Vision:** We envision a resilient, ecologically-interconnected landscape that sustains a full range of native wildlife and enhances people's quality of life for generations to come.

**A2A Mission:** We connect lands and people across the Algonquin to Adirondacks region to conserve and enhance a critical corridor for ecological integrity and resilience in eastern North America.

**Algonquin to Adirondacks Collaborative response to ERO posting #019-6160**

Re: **ERO posting #019-6160, Proposed Updates to the Ontario Wetlands Evaluation System**

The Algonquin to Adirondacks (A2A) Collaborative is a Canadian, U.S. and First Nations organization of over 50 partners that works with scientists, policy-makers and a variety of conservation groups to protect and enhance the unique ecological features and functions of the region stretching from and encompassing Algonquin Park in Ontario and Adirondack Park in New York State. The following comments are unanimously submitted by the Board of Directors of the A2A Collaborative:

We are especially concerned with the protection of wetlands, as two-thirds of these critical ecological features have already been lost in Southern Ontario. Unfortunately, **the proposed changes to the Ontario Wetlands Evaluation System (OWES) in ERO posting #019-6160 would dramatically reduce the protection of wetlands in the province, and must be withdrawn**.

**ERO posting #019-6160**

In ERO posting #019-6160, the Ontario government proposes to make major changes to the Ontario Wetland Evaluation System (OWES) in order to “*support the construction of 1.5 million new housing units over the next ten years*”. We strongly oppose such changes to the OWES. Wetlands must not be destroyed or compromised to build housing developments.

Southern Ontario’s wetlands are critical for wildlife habitat, water quality and flood reduction. Unfortunately, two thirds of Southern Ontario’s wetlands (including many in the A2A region) have already been lost due to development of various kinds over many decades. The importance of protecting the remaining third has been widely recognized for many years.

Ontario already has sufficient lands available to accommodate present and foreseeable housing, without the need to sacrifice sensitive natural areas such as wetlands. Indeed, the Ontario government’s own Housing Affordability Task Force has concluded that “*a shortage of land isn’t the cause of the problem”* and *“Most of the solution must come from densification. Greenbelts and other environmentally sensitive areas must be protected*” (Housing Affordability Task Force Report, 2022, p. 10). New housing developments must not be built on or adjacent to our remaining wetlands, and must not be located where they may compromise wetland functions.

The Ontario Wetland Evaluation System (OWES) determines which wetlands are considered “significant” and establishes the boundaries of significant wetlands. It is a highly-regarded, science-based tool. The proposed changes in ERO posting #019-6160 would alter how the OWES identifies Provincially Significant Wetlands (PSWs), and would make it more difficult for wetlands to qualify as PSWs in the future, and result in the de-designation of many existing PSWs.

The proposed changes to the OWES would greatly reduce the evaluation and protection of wetlands. The Rideau Valley Conservation Authority (RVCA), in the A2A region, has stated that these changes would lead to “*increased flooding, erosion and drought, as well as diminished groundwater, which is the source of drinking water in much of rural Ontario. Studies have shown the loss of wetlands in the Rideau watershed would increase flood levels by 10%*” (RVCA website, Nov. 10, 2022).

Of particular concern is the proposed change that would eliminate the use of ”wetland complexes” (two or more wetlands that are functionally linked, but separated by a non-wetland area) in evaluating and designating significant wetlands. Many organizations with expertise in wetland conservation have expressed alarm at this proposal. For example, the Niagara Peninsula Conservation Authority (NPCA) has stated that “*The removal of complexing along with the other proposed changes to the OWES would result in the eventual chipping away of our wetland complexes in Niagara. In the NPCA’s jurisdiction, there are over 170 wetlands that have been evaluated, with more than 135 evaluated as wetland complexes. With the above changes this means that almost 80% of the NPCA’s wetlands that are currently evaluated as complexes could be negatively impacted*” (NPCA comments on ERO postings, NPCA website, Nov. 7, 2022).

The proposed changes would also eliminate scoring of habitat for Endangered or Threatened species, a critical element in evaluating wetlands.

Overall, the proposed changes would have a devastating impact on Ontario’s wetlands and species at risk, and must therefore be withdrawn.

**Bill 23, More Homes Built Faster Act, 2022**

The proposals in ERO posting #019-6160 are directly linked to the government’s Bill 23, which contains many additional proposals that would directly or indirectly affect wetlands. For example, Bill 23 proposes to greatly limit input to planning processes by Conservation Authorities (CAs), which currently play a major role in protection of watersheds, wetlands and in flood mitigation.

The proposed “offsetting” policy is also of grave concern. It is supposed to compensate for the loss of wetlands and other natural areas due to development, by recreating these features elsewhere or allowing the developer to simply pay into a compensation fund. There is no evidence that such schemes actually work. Destroyed wetlands cannot simply be recreated elsewhere.

All provisions of Bill 23 that would negatively affect wetlands must be removed.

A2A has commented more fully on the many negative aspects of Bill 23 in a separate submission to the Standing Committee on Heritage, Infrastructure and Cultural Policy.

**Lack of public and stakeholder consultation**

There was no meaningful consultation with the general public, First Nations, Conservation Authorities or municipalities before the proposals in ERO posting #019-6160 or in Bill 23 were put forward. This is unacceptable.

**Conclusions**

To protect Southern Ontario’s remaining wetlands, we ask that:

* ERO posting #019-6160 on the OWES be withdrawn.
* All proposals in Bill 23 that would the affect the identification, designation or protection of wetlands, or that would reduce the role of Conservation Authorities be removed.
* The government fully consult with the public, First Nations, Conservation Authorities and municipalities before any proposals that affect wetlands are put forward.

Thank you for considering and implementing these comments.