



November 22, 2022

Public Input Coordinator
MNRF – PD – Resources Planning and Development Policy Branch
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Re: **ERO Posting No. 019-6160**
Proposed Updates to the Ontario Wetland Evaluation System

We support the government's commitment to streamlining processes and reducing unnecessary barriers to development. However, we are concerned that the proposed changes to the Ontario Wetland Evaluation System (OWES) may have unintentional, negative consequences for public safety and water supplies.

1. The critical role of wetlands in mitigating floods and maintaining water supplies on a watershed basis should be highlighted in considering changes to the Provincial Policy Statement and the Ontario Wetland Evaluation System.

The Long Point Region Conservation Authority (LPRCA) is concerned about the proposal to allow single wetland units in existing wetland complexes to be re-evaluated, potentially undervaluing their importance. Large wetlands and their adjacent satellite wetland features are fundamentally important in maintaining plant communities, wildlife populations, natural hydrology, watercourse health, irrigation resources and food production in the Long Point Region watershed. Small adjacent satellite wetlands and their associated riparian habitat provide important wildlife production, including the production of amphibians that wouldn't reproduce nearly as well in the main wetland due to the more permanent water and associated predators. This primary production provides important food resources for species found in the main wetland. Additionally, plant communities found in these adjacent seasonal and vernal wetlands are important in providing food and nursery habitat for wildlife that migrate to the more permanent open water wetlands as they develop.

In addition to wetlands' well-recognized natural heritage roles, wetlands mitigate floods and maintain water supplies. The loss of the wetlands in the Long Point Region watershed that is likely to result from the proposed changes to the Ontario Wetland Evaluation System and the off-setting provisions proposed in the Provincial Policy Statement will increase flooding and decrease water supplies including the supplies that support specialty crop production in the important Norfolk Sandplain region.

In the LPRCA watershed, many wetland complexes are found on the Norfolk Sandplain. The Norfolk Sandplain is characterized by having a shallow unconfined aquifer that is seasonally recharged by precipitation, filling both the main and smaller satellite wetlands. As the season progresses, the surface and groundwater from the smaller satellite wetlands moves through the sandy soils feeding the main wetland and the downstream watercourses. The proposed elimination of wetland complexes will put these smaller adjacent wetlands at risk of being evaluated as less important, and without protection, the volume of both surface and groundwater storage will be impacted, impacting the hydrology of the main wetland and decreasing the volume of both surface and groundwater discharge, fundamentally important for maintaining the flows in downstream watercourses. Without sufficient flows in the downstream watercourses there will be negative impacts on the natural ecosystem, recreation and tourism, irrigation and associated food production in the Long Point Region Watershed.

2. The OWES requirement to access existing data sources should be strengthened.

As written, the proposed changes to the OWES suggest but do not require that evaluators consult existing data sources, increasing the likelihood that important data including species at risk observations and seasonal wetland hydrology fluctuations and associated habitats will be missed.

3. The Hydrology Component of the OWES should be strengthened given the cumulative importance of wetlands in flood attenuation, erosion control and groundwater recharge, i.e. in mitigating floods and maintaining water supplies.

The Hydrology Component of the OWES 3.2 manual is oversimplified for “ease of assessment by non-hydrologists”. The cumulative importance of wetlands is admittedly under-valued, even negatively valued. Without consideration of complexing, an individual wetland cannot score well, i.e. be considered important, based on its hydrology function.

4. Given the recognized importance of isolated wetlands for flood mitigation, Section 28(25) “wetland” (b) of the *Conservation Authorities Act*, that restricts the definition of wetlands to those that have a hydrologic connection to a watercourse, should be removed.

Section 28(25) of the *Conservation Authorities Act* provides the definition of wetlands that applies to CA permitting includes a condition that the wetland:

(b) directly contributes to the hydrological function of a watershed through connection with a surface watercourse.

Given the recognized importance of isolated wetlands for flood mitigation and the maintenance of water supplies, the CA Act definition of wetlands should include isolated wetlands, i.e. wetlands that are not connected to a watercourse. The history and reason for this limitation is outdated and the definition should be rethought.

5. There must continue to be a central repository for wetland evaluations so that the collective knowledge of wetland attributes is recoverable.

With the proposals to drop the concept of evaluation updates and for evaluations to be submitted to the municipality and not the Ministry of Natural Resources and Forestry (MNRF), there is a risk that the collective knowledge about the attributes of wetlands will be lost. New knowledge will be disbursed among municipal planning files. Even if MNRF ceases to review evaluations, the evaluations must be copied to a central repository so the knowledge is recoverable when the need arises.

Thank you again for the opportunity to provide comments. We request your thoughtful consideration of the proposed changes in this submission to identify solutions to stream development approvals without jeopardizing public safety.

Sincerely,

A handwritten signature in black ink that reads "Judy Maxwell". The signature is written in a cursive, flowing style.

Judy Maxwell
General Manager
Long Point Region Conservation Authority