



Severn Sound Environmental Association

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Submitted by email to:

Public Input Coordinator

MNRF - PD - Resources Planning and Development Policy Branch

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RE: Environmental Registry of Ontario Number 019-6160
Proposed Updates to the Ontario Wetland Evaluation System

The Severn Sound Environmental Association (SSEA) is pleased that the Ministry of Natural Resources and Forestry (MNRF) provides guidance and oversight of wetlands in the province, and we appreciate the opportunity to comment on the *Proposed Updates to the Ontario Wetland Evaluation System (OWES)*.

The Severn Sound watershed is in southeastern Georgian Bay. The SSEA is a Joint Municipal Service Board under the Municipal Act, and works closely with eight lower tier municipalities (Midland, Penetanguishene, Tay, Tiny, Springwater, Georgian Bay, Severn and Oro-Medonte) and two upper tier municipalities (County of Simcoe and District of Muskoka) in the Severn Sound area, as well as provincial and federal government agencies and non-government organizations. The SSEA's mission is ensuring exceptional environmental quality through exemplary stewardship of the Severn Sound area through sound science, collaboration and partnerships. The SSEA collects environmental data and provides expertise to member municipalities, works to keep water clean so it supports healthy terrestrial and aquatic ecosystems, and has been heavily involved in municipal drinking water source protection activities, as well as in conducting wetland evaluations and identifying and documenting natural heritage features for several member municipalities for use in their Official Plan updates. The SSEA is the local Source Protection Authority in the Severn Sound area.

We offer the following comments regarding the above noted ERO posting.

1. There has already been significant loss of wetlands in Ontario. Wetlands – large and small, provincially significant and non-provincially significant – are important for a variety of reasons, including but not limited to: providing habitat for common and at-risk species, contributing to native biological diversity, improving water

quality and attenuating flooding and contributing to climate resilience. Wetlands are critical natural infrastructure, natural assets on the Ontario landscape, contributing environmentally and economically. Preserving remaining wetlands is important, since it is challenging to fully compensate for all values through offsetting projects, and since there is uncertainty about the effects of climate change on wetlands and some wetland loss from this threat may occur despite gains made elsewhere.

The Province previously developed a draft [Wetland Conservation Strategy for Ontario 2016-2030](#) which included strong guiding principles and actions for conservation and protection of wetlands, with three priority actions: improving Ontario's wetland inventory and mapping, developing policy approaches and tools to prevent the net loss of wetlands in Ontario, and improving guidance for evaluating the significance of wetlands. The SSEA submitted comments on this Strategy which were supportive of its intent and priority actions. Preventing net loss of wetlands and their critical functions locally and broadly on the Ontario landscape remains paramount to a healthy environment and strong economy and a sustainable Ontario.

The proposed changes to the OWES, including wetland complexing and scoring, such as removing points for presence of Endangered/Threatened Species At Risk, will result in fewer wetlands meeting criteria as Provincially Significant Wetlands (PSW) and some wetlands currently designated as PSW may lose this designation, which is likely to result in considerable loss, fragmentation or alteration of wetlands as well as their benefits and values to humans and the ecosystem. This would be in direct opposition to the goals, guiding principles and actions for conservation and protection of wetlands previously identified by the Province.

We strongly encourage the Province to maintain and further develop policy approaches and tools to prevent the loss of wetlands, strengthen provincial wetland policy including recognizing the importance of non-Provincially Significant Wetlands/ locally significant wetlands and unevaluated wetlands, improve wetland inventory and mapping data to support wetland conservation and restoration, and ensure appropriate land use planning decisions are made regarding wetlands including ensuring adequate terrestrial buffers to these features. In addition, there is a need to ensure that policy approaches and tools that are developed are effectively implemented.

2. One of the strengths of the OWES is that it was developed by experts including input from the provincial Wetland Evaluation Technical Team and working groups of professionals with specific expertise. It is not clear that the proposed changes were all science-based decisions, with conservation of wetlands as the priority. For example, there is no scientific rationale provided for the proposed changes to wetland complexing or removal of scoring for Endangered/Threatened Species

At Risk (SAR). The current OWES acknowledges that wetlands located within 750 m of one another can be ecologically and hydrologically linked and as a whole be important for wildlife; the importance and connectivity of these wetland complexes would be diminished under proposed changes. Numerous SAR rely on wetlands or wetland complexes for part or all of their life cycle, and the presence of Endangered or Threatened species is often a key factor in determining significance of wetlands - it is impossible to protect species without protecting the habitat they rely on.

The SSEA urges the Province to retain current complexing rules and scoring for Endangered/ Threatened Species At Risk in the OWES, and not implement the proposed changes to the applicable sections.

3. Under the current OWES, municipalities and other agencies have had access to Provincial expertise such as MNRF biologists and staff with significant experience in wetlands and habitat, and with protection and conservation of wetlands as a focus. This has been a valuable asset for municipalities that do not have this expertise, for example in determining on-the-ground limits of PSW that need to be protected from site alteration and development in accordance with provincial policy.

With the proposed changes, the Province would no longer be responsible for oversight of wetland evaluations, including designating their significance and boundaries or ensuring that information about wetland significance is publicly available. The onus would shift to local decision makers, including municipalities, who may not have appropriate expertise, resulting in greater financial burden for accessing external expertise, and/or the risk that decisions may be made that are not consistent with protection of wetlands. It is unclear if there is any appeals process for wetland evaluations, or who the final authority would be in the event of a dispute about a wetland's significance or on-the-ground extent and boundaries.

The SSEA is of the opinion that the Province should maintain expertise in wetlands and oversight of the OWES, including designating wetland significance and boundaries; continued investment into MNRF is needed to ensure strong leadership in wetland conservation and adequate funding and resources for successful implementation.

4. Some municipalities have progressive policies to protect all wetlands, regardless of significance. The proposed changes to the OWES removes the section on Locally Important Wetlands which currently includes the text "*all wetlands have value, both to society and intrinsically*" and "*Municipalities may determine that some of these 'other' wetlands are significant on a local scale and may decide to protect them*".

Removal of this section of the OWES weakens the recognition that non-PSW have value, and there may be little incentive or support for municipalities to go over-and-above provincial policies for wetland protection. Municipalities may have difficulty defending policies for protection and conservation of all wetlands (not just PSW), resulting in increased pressure to allow non-PSWs to be developed, resulting in the loss of habitat, species and benefits to humans and ecosystems. The science tells us that wetland have significant local value to the environment and economy beyond habitat and natural areas, including flood attenuation and filtering water, which are also important for protecting drinking water sources.

As proposed, the changes to the OWES would considerably weaken overall protection for wetlands in Ontario, when conservation of these habitats and natural assets is needed more than ever. We urge the Province to invest in and support conservation and protection of wetlands, retain current complexing rules and scoring for Endangered/Threatened Species At Risk in the OWES, and maintain MNRF oversight of OWES and ensure any proposed changes are science-based and incorporate knowledge from wetland experts and working groups as well as Indigenous perspectives and traditional ecological knowledge.

Thank you again for the opportunity to offer feedback on the *Proposed Updates to the Ontario Wetland Evaluation System*. Please continue to include the SSEA in additional proposed changes to the OWES. The SSEA welcomes the opportunity to discuss our comments further at your convenience. If you have any questions or comments please feel free to contact the SSEA office.

Sincerely,



Michelle Hudolin
Wetlands & Habitat Biologist

CC. Julie Cayley, SSEA Executive Director