



November 23, 2022

Public Input Coordinator
MNR - PD - Resources Planning and Development Policy Branch
300 Water Street, 2nd Floor, South tower
Peterborough, ON
K9J 3C7
Canada

Submitted by email to: wetlands@ontario.ca

**RE: Comments on Proposed Updates to the Ontario Wetland Evaluation System
ERO number: 019-6160**

Walker Aggregates Inc. (“Walker”) is a division of Walker Industries. Our company operates several mineral aggregate operations across Ontario and provides a full range of crushed limestone and sand and gravel products supplying the asphalt, concrete, construction and landscaping needs of Southern Ontario.

The government is proposing changes to legislation and provincial evaluation systems, including the Ontario Wetland Evaluation System (OWES) in order to allow for further streamlining of development decisions to make it easier and faster to build new homes as part of its commitment to build 1.5 million homes over the next ten years as part of the *More Homes Built Faster: Ontario's Housing Supply Action Plan: 2022-2023*. Walker appreciates the opportunity to provide the following comments on the proposed changes to the OWES, particularly aspects which have the ability to effect applications for mineral aggregate operations.

More housing and infrastructure means the need for the availability of raw building materials such as sand, gravel and stone and by-products such as concrete and asphalt. Further, the cost of providing these materials is more economical if these resources are derived close to market. It is encouraging that the Province recognizes this correlation and, in many ways, are proposing changes that will fundamentally help support this important principle.

Overall, Walker supports the proposed changes to the Ontario Wetland Evaluation System (OWES) as the changes would:



- Simplify the evaluation process and allow for wetland evaluation to be scoped on a case by case basis. In turn, this simplified process will help to streamline and facilitate development review and approvals while allowing for evidence-based decisions on determining wetland significance and the requirement for protection, and,
- Allow smaller wetlands to be evaluated individually and not complexed into a Provincially Significant Wetland.

Smaller wetlands may not merit the designation of Provincial significance however under the current complexing process are allowed this designation only through the complexing process. The removal of Complexing allows for the implementation of a more integrated land use management approach where smaller, less consequential natural heritage features, may be replicated on the landscape by transferring their form and function to more effective wetland areas. While compensation is not included in this legislation, the Province has also requested comments on “Conserving Ontario’s Natural Heritage” (under ERO 019-6161). We see these proposed changes and the principle of offsetting working together holistically to support a more diverse and strategic land management approach.

For example, the proposed changes would potentially allow for the removal of smaller, less significant wetland(s) while at the same time opening up potential ecological offsetting opportunities that could result in a net benefit. The offset opportunities allow for flexibility and permits government and private stakeholder to direct funds and efforts to enhance critical wetland areas. The restoration and creation of new wetlands, that replace less valuable and/or fragmented features, enables an integrated, regional, broad scale land use planning approach that is better suited to managing the ever growing needs of both the natural ecosystems and on-going community growth demand (i.e. housing). The proposed changes and advancement of the OWES process, in combination with other proposed changes, resolve to implement compensatory scenarios, as discussed in the Conserving Ontario Natural Heritage.

This approach is particularly important when making aggregate resources available. As aggregate producers, we have to go where deposits are located and often these locations coincide with the presence of natural heritage features, including wetlands. The ability to strike an appropriate balance and allow for the consideration of offsetting can achieve better outcomes for all of these provincial interests. In certain cases, compensation for the loss of natural heritage features including wetlands may be appropriate and can lead to the potential creation of new natural heritage features, including wetlands designed to provide an even greater positive environmental impact.

Walker appreciates the Province’s consideration of our comments on the legislative and provincial evaluation system changes proposed in support of the *More Homes Built Faster: Ontario’s Housing Supply Action Plan*.



Yours truly,

A handwritten signature in black ink, appearing to read 'K. Kehl.', enclosed within a faint, light-colored rectangular border.

KEVIN KEHL
AGGREGATES & CONSTRUCTION DIVISION