



November 22, 2022

The Honourable Graydon Smith  
Ministry of Natural Resources and Forestry  
300 Water Street, 2nd Floor, South Tower  
Peterborough, ON  
K9J 8M5

Dear Minister Smith:

**Re: ERO Number 019-6160 - Proposed Updates to the Ontario Wetland Evaluation System**

---

I wish to provide you the following comments regarding ERO-019-6160 - Proposed Updates to the Ontario Wetland Evaluation System.

The OWES is a science-based system that outlines a process, and a set of criteria to define, identify, and assess the functions and values of wetlands in Ontario. Conservation Authorities rely on this proven scientific methodology as an aid in implementing regulations under the Conservation Authorities Act. This information is used for making decisions for the purposes of public safety, natural hazard prevention and management, regulate wetlands for flood attenuation, natural storage capacities and for preventing shoreline erosion.

Wetland Complexing has been entirely removed from OWES. Upon re-evaluation, each wetland unit must qualify as significant individually.

Reproductive Habitat and Migration, Feeding or Hibernation Habitat for an Endangered or Threatened Species sections and scoring has been entirely removed. Scoring was weighted to protect habitat. No consideration or scoring weight adjustment added for this section. The weighted scoring matrix no longer evaluates all criteria against the list of all weighted factors.

It is unclear who the 'decision-maker' is and who will ensure evaluations are done by qualified professionals following OWES protocols.



It is unclear from the posting who will maintain an appropriate mapping inventory of wetland classifications, particularly non-Provincially Significant Wetlands (PSWs).

CAs have been maintaining data inventories of wetlands for many years and would be well-suited to takeover this role with respect to OWES evaluated wetland mapping. This is vital for municipal decision-making and is well-suited to a CA's resource management agency role.

Requests to re-evaluate a complexed PSW will no longer consider the greater function of that wetland and rather will evaluate it as an isolated wetland unit. The removal of complexing along with the other proposed changes to the OWES would result in the eventual reduction of our wetland systems.

The proposed changes remove language around Locally Important Wetlands (LSWs). These wetlands could be evaluated, partially evaluated or unevaluated. Sometimes they are known as non-PSWs, LSWs, or other wetlands. If these wetlands have been evaluated as non-PSWs, once a re-evaluation of these wetlands occurs, there is no mechanism to identify or preserve it, resulting in negative impacts to evaluated non-PSWs.

Thank you for the opportunity to submit my comments regarding these proposed legislative changes. I look forward to reviewing the outcome of the consultation.

Sincerely,

Tracey M. Bailey,  
Mayor

Cc: Tammie Ryal, Corporate Leader Growth & Sustainability  
Truper McBride, Chief Administrative Officer  
Aaron Hair, Division Leader Community Planning