

	<p>provide clear instruction for submitting wetland evaluations to ensure those documents are standardized and publicly accessible within a reasonable amount of time. There needs to be an accountable organization or public body responsible for records keeping, ensuring that old files and associated data are accessible and new information is made available. In the revised OWES manual, please include clear requirements and timelines associated with submitting wetland evaluations and associated digital mapping files. Consider utilizing the Natural Heritage Information Centre / Lands and Information Ontario platform to make current and past wetland evaluations available to decision makers, the public, stakeholders, academia, Indigenous communities, NGO's, etc. NHIC is referenced as a source for a number of other OWES criteria and holds publicly accessible natural heritage data – thus this platform would be a logical location for making wetland evaluation documents and data available. This comment is also relevant to the following sections within OWES: Field Evaluation, Wetland Boundaries, Preparation of Wetland Maps, and Completing the Wetland Data and Scoring Record.</p>
Page 12	<p>The section titled 'Sources of Information', outlines that 'no information' should be clearly stated, and the wetland evaluation should not contain any blanks. It is acknowledged that wetland evaluations may not be completed to the greatest degree of accuracy. Wetland evaluators are limited by their professional experience, expertise, and access to data. Thus, it is critical for some level of administration oversight and / or peer review to ensure that all data applicable to a wetland evaluation is considered, and to ensure that practitioners are provided with access to data that may have been missed or was unavailable (e.g., through data sharing agreements, specialized licencing and / or training; data that is restricted, etc.).</p>
Page 14-15	<p>Trained evaluators can now have untrained individuals assist them with field visits provided their work is reviewed by the trained evaluator. This opens the door for incomplete data collection if individuals do not have the appropriate level of expertise. Consider providing stronger language on sign-off from a certified wetland evaluator, ensuring the data is complete and the wetland evaluation has been carried out in accordance with the manual. Further, reconsider the essential need for oversight to the process so that there is an opportunity to review and accept wetland evaluations.</p>
Page 14	<p>The new section titled 'Field Visits' states that wetland evaluations require field visits at an appropriate time of year. Please consider providing some additional guidance on the meaning of 'appropriate time of year'. Some criteria considered under OWES can be assessed at any time of year, however, other information can only be accurately obtained during a specific window. For instance, delineating the boundary between upland and wetland vegetation and accurately identifying plants within a wetland can only be accurately undertaken during the growing season. Despite this, many practitioners attempt to identify plant species and map wetland boundaries during the winter months.</p> <p>Please provide further guidance to ensure OWES provides clear direction and eliminates opportunities for abuse or misinterpretation. The lack of specific direction in this section will result in missed opportunities for appropriate field work and delay in the evaluation process.</p>
Page 15	<p>Please leave proposed strikeouts in the section titled 'Timing of Field Visits' to ensure evaluators understand the value in identifying data/information gaps that may influence (re)evaluations or revise the information to better reflect to the proposed changes to OWES. Specifically, maintain a note that "A wetland evaluation is conducted at a point in time. Thus, information obtained in an evaluation should be considered in the context of</p>

	available information at that time. Where information is not available, this should be clearly noted. As wetlands may be re-evaluated in the future, it is crucial to identify any missing information or data gaps that may be filled at a future date’.
Page 18	In the section ‘Wetland Boundaries’, the note ‘existing wetland boundaries, regardless of their age remain in effect until they are revised...’ is proposed for removal. This note should remain in the text of the manual or revised to align with proposed changes to OWES. It is important that the OWES manual states that wetland boundaries remain in effect until they are re-evaluated, or the boundaries refined through a site visit (as per direction contained in the section Wetland Re-Evaluations and Mapping Updates). This would ensure that wetland boundaries are not removed from the provincial data set until it can be clearly demonstrated that the wetland has changed or no longer exists through the OWES process.
Page 20	Within the section ‘Wetland Edges Bordering on Lakes and Rivers’, please consider the following minor revisions: <ul style="list-style-type: none"> • Correct the type-o within the second example to read ‘river or lake’. • Utilize the same unit of measure, noting a distance of 30 m or less (as opposed to 100 feet) in the second example. • Provide clarity on the term ‘edges bordering on’ to avoid ambiguity. • The terminology ‘bordering on’ is utilized elsewhere in OWES. Please clarify as needed throughout OWES to avoid ambiguity in interpretation and resulting delay.
Page 20	Within the section ‘Wetland Edges Bordering on Lakes and Rivers’, examples outline circumstances under which very closely grouped wetlands function together as one. Two examples are provided. Please consider providing more context or criteria to be met to consider closely grouped wetlands to be evaluated as one and provide additional direction to evaluators on how to make this determination.
Page 20	Under the proposed process where no review or oversight is required, a lack of specific criteria for grouping wetlands will result in misinterpretation and delay. Please consider applying lessons learned from the current OWES process and provide more specific direction on grouping wetlands as one.
Page 20	Within the section ‘Wetland Edges Bordering on Lakes and Rivers’, a 30 m threshold has been applied to outline when wetlands should be evaluated as one unit. Additionally, 100 feet has been identified as the threshold for wetlands along a ‘river of a lake’ to be considered as one unit. The scientific rationale for this is not clear. Please consider utilizing a defensible and consistent threshold based upon a literature review and / or direction in existing policies and guidelines, and that a reference is provided rationalizing the distance threshold and consider hydrological and biological criteria.
Page 23	Catchment Basin maps can no longer be used in the scoring process for the hydrological component as per the proposed changes to OWES. The hydrological component is designed to determine the net hydrological benefit provided by the wetland to the portion of the basin downstream of the wetland. The catchment basin map is used to identify other detention areas and feeds into the flood attenuation (section 3.1) and water quality improvement (section 3.2) calculations in the hydrological component. Thus, excluding the catchment basin map implies that a given wetland would automatically score lower if the added information obtained from the catchment basin map is being excluded. Rationale for this exclusion should be provided. Please reinstate the section on catchment basin maps in OWES to ensure that the net hydrological benefit provided by the wetland is considered in OWES or consider an alternative criterion to account for the catch basin component.

Page 24	<p>Direction from the removed section ‘Completing the Wetland Evaluation Data and Scoring Record’ is critical to ensure a wetland evaluation is completed to the standards set out in the manual. Please consider leaving in the existing text or revising it to reflect any relevant changes in the manual. OWES should provide clear direction on information to be contained within a wetland evaluation, the format which it should be prepared in, and timelines associated with submitting the materials. If the Province’s role in providing oversight to wetland evaluations is removed, it is critical that new processes and standards be put in place to ensure OWES is accurately and consistently applied, and there is little room for misinterpretation of expectations or misapplication of the manual. This comment is also relevant to the following sections within OWES: The Wetland Evaluation File, Field Evaluation, Wetland Boundaries, and Preparation of Wetland Maps.</p>
Page 26	<p>Revisions are proposed to the section titled ‘Wetland Size’. This section notes that small wetlands, those under 2 ha in size, are generally not evaluated. Rationale is to be provided if these wetlands are to be evaluated. While OWES acknowledges that small wetlands have important hydrological, social, and biological functions, there is a significant gap in ensuring the values associated with small wetlands are accurately accounted for, particularly in areas where wetland loss is the greatest.</p> <p>Small wetlands dominate the landscape in built-up areas in southern Ontario. Only approximately 9% of wetlands in the southern GTA (Eco-District 7E-4) are greater than 2 ha in size, while only 17% of wetlands in the central GTA (Eco-District 6E-7) are greater than 2 ha in size. These statistics are further highlighted when considering that 72% of wetland units in southern GTA are less than 0.5 ha in size, and 59% of wetlands in central GTA are less than 0.5 ha in size.</p> <p>Considering their rarity on the landscape, these small wetlands hold critical hydrological, social, and biological functions – particularly when considered cumulatively across the landscape. Small wetlands are often hydrologically linked to other wetlands and surface water features within a watershed; contain important groundwater seepage functions, particularly in headwater areas; support flood attenuation; provide important habitat connectivity; and support Significant Wildlife Habitat, habitat of species at risk, and rare species, providing critical biodiversity and habitat functions. They also contribute to societal well-being and culture in a variety of ways. However, small wetlands and their value are often overlooked. They will be even further overlooked considering that the ability to complex wetlands is proposed for removal from OWES. It is strongly recommended that the section on Wetland Size in OWES be updated, and direction provided to encourage or require evaluations of wetlands under 2 ha in size in areas where wetland loss is the greatest. For instance, where wetlands under 2 ha in size represent over 75% of wetlands on the landscape in an Eco-District, or within a watershed, could be a trigger to undertake a wetland evaluation.</p>
Page 26	<p>The changes proposed to OWES as they relate to the ability to evaluate wetlands as part of an interconnected complex, as well as the manual maintaining that small wetlands (under 2 ha in size) need not be evaluated presents considerable challenges particularly across built-up areas where small wetlands dominate the landscape yet provide critical functions. At minimum there should be language in OWES that stipulates that land use planning and development decision makers may request or require, at their discretion, that smaller wetlands be evaluated to support effective decision making and to accurately apply policy. In addition, consider the size trigger for a wetland evaluation being consistent with other</p>

	<p>provincial guidelines or evaluation tools (e.g., ELC, Oak Ridges Moraine and Greenbelt Technical Papers). The opportunities to evaluate closely linked wetlands as one unit should be further expanded in OWES. This is one such matter in OWES that may be best addressed through a working group of all those involved in the wetland evaluation process.</p>
Page 26	<p>Removing all ability to evaluate wetlands as part of a complex of closely spaced wetlands that are related in a functional way would present considerable challenges in identifying wetland values across the landscape and accounting for the cumulative functions of wetlands when considered as interconnected features. This reverses the natural heritage system and landscape scale approach to management that has developed over the past decades. This will also result in the value of small wetland being overlooked or ignored as scores will be lower with smaller units having fewer species, less interspersions, smaller catchments, etc. The risk to wetlands across the landscape is considerable, particularly in areas where small wetlands dominate the landscape and where pressures on wetlands are greatest. OWES must recognize the interconnected nature of wetlands across a landscape and account for values and functions that should be considered cumulatively. This gap can be addressed through various means, including:</p> <ul style="list-style-type: none"> • Maintain the ability to evaluate wetlands as part of a complex in OWES, with much greater direction and clarity provided. The current approach lacks clear direction and thus has resulted in challenges and misapplication of wetland complexing when considering small, isolated, low functioning wetlands. This can be remedied through a more clear and efficient process of wetland complexing, as opposed to eliminating the ability to complex wetlands entirely. • Include wetlands that are closely linked but not directly bordering on lakes and rivers. Currently, proposed revisions to the section ‘Wetland Edges Bordering on Lakes and Rivers’ provides examples of when closely linked wetlands should be evaluated as one, but this could be expanded upon. • Greatly increasing the eligible scoring under Section 1.2.4 ‘Proximity to Other Wetlands and Waterbodies’, thus recognizing the greater value of wetlands that are connected hydrologically or biologically. <p>It is strongly recommended that the OWES ensure that the intent of wetland complexing is not lost, to acknowledge that in some circumstances the interconnected nature of wetlands should be valued, and to ensure that small wetlands are recognized for their values and functions, particularly when evaluated cumulatively across the landscape. Should these gaps remain, the challenges with implementation of OWES will persist, rendering the update to OWES a futile exercise. Likewise, the potential repercussion and loss of wetlands that are no longer fairly valued could be significant.</p>
Page 41	<p>Under Section 2.2 (Recreational Activities), recreational activity information gathering should also include government records as a source. The Province holds much of this information and should be appropriately referenced.</p>
Page 42	<p>A note on Page 42 has been removed, specifically as it relates to ‘Aboriginal values’. In fact, reference to Indigenous community values is insufficient throughout the document. It is recommended that Indigenous values associated with wetlands are strongly acknowledged and valued in OWES. Consultation with Indigenous communities should be a critical component of updating OWES, particularly updating Section 2.8 to be consistent with government commitments to meaningful engagement and collaboration.</p>

Page 46-47	<p>Within section 4.1.2 (Species), please reconsider the strike out proposed within the last paragraph on page 47. It should be noted in OWES that existing information contained within a wetland evaluation is valid until a new evaluation is undertaken and additional survey completed to document species present within a wetland. Validity of species observations should not be solely based on the evaluator’s discretion, but also on any applicable standards set by NHIC. It is not clear why removing this section from OWES is required – thus this paragraph should be reconsidered for inclusion or revised appropriately to reflect applicable changes to OWES.</p> <p>Within Section 4.1.2 also please reconsider strike outs with respect to contacting NHIC for support in interpreting Element Occurrences – it is best to have the most accurate information in a wetland evaluation, and thus consultation with experts should be encouraged rather than discouraged. This will avoid potentially valuable data excluded at the evaluator’s discretion. Evaluators cannot be assumed to have relevant expertise within all wetland evaluation criteria, and thus, consulting experts or provincial standards should be encouraged.</p>
Page 51-52	<p>The evaluation criteria in OWES remains largely unchanged, other than species at risk, where evaluation criteria is to be removed related to Reproductive Habitat for Endangered and Threatened Species (Section 4.1.2.1) and Migration, Feeding or Hibernation Habitat for an Endangered or Threatened Species (Section 4.1.2.2). Rationale for excluding scoring criteria related to species at risk should be provided, noting that a majority of wetland habitats that support these species have been impacted by land use conversion.</p> <p>It is acknowledged that an automatic score of 250 has been problematic in the past, as this score would automatically result in the wetland being considered a PSW. However, complete removal of all references and criteria related to species at risk is not an appropriate solution. Values associated with species at risk that rely on wetlands to carry out their life processes must be acknowledged in OWES to ensure that some of the more critical functions of wetlands are considered.</p> <p>It is noted that species at risk are generally captured as provincially tracked species in Sections 4.1.2.3 and 4.1.2.4 of OWES – however, distinguishing and acknowledging species at risk separately from provincially tracked species should remain a component of the evaluation.</p> <p>It is therefore recommended that, rather than exclude a species at risk section entirely, the criteria for consideration of species at risk be refined to ensure that it is clearly demonstrated that a wetland directly supports critical life processes of the species, and a lesser score (e.g., score of 150 per species, and 75 for each additional species) be afforded to species at risk to address the challenges of an automatic PSW designation.</p> <p>It is recognized that there are other legal mechanisms in place that dictate the management of species at risk and their habitats (e.g., Endangered Species Act). That said, the intent of OWES should be on the comprehensive and scientifically based valuation of wetlands, including their role in supporting species at risk.</p>
Page 55	<p>A note is added to Page 55, outlining that the ministry may make a list that could be used in addition to or instead of those in Appendix 5 and 6. Please state ‘from time to time’ and include text outlining that these lists created by the Ministry should be developed in</p>

	consultation with internal and external experts. The recommendation for an overarching working group could be a mechanism to allow for this review and consultation or a commitment to consultation on the ERO could alternatively be provided.
Page 55	Any references where point criteria using Significant Wildlife Habitat Ecoregion Criteria Schedule is recommended, evaluators should demonstrate full survey methodology has been carried out. This is critical given the previous role of MNRF would be removed.
Page 63	We recommend reinstating reference to locally significant wetlands. Municipal governments should be provided an opportunity to utilize the information gathered through an OWES evaluation as ‘the basis for considering management options and alternatives’ (as noted in the introduction).

Thank you for the opportunity to provide comments on this important initiative. Should you have any questions, require clarification, or wish to meet to discuss any of the above remarks, please contact the undersigned at 416.667.6920 or at john.mackenzie@trca.ca.

Sincerely,

<Original Signed by>

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