



Fragile Inheritance Natural History
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12 November 2016

Terese McIntosh, Biodiversity & Wetlands Program & Policy Advisor
MNRF, Policy Division, Natural Resources Conservation Policy Branch
Natural Heritage Section
300 Water Street, Peterborough, Ontario K9J 8M5

RE: EBR 012 – 7675: A Wetland Conservation Strategy for Ontario 2016-2030

Dear Ms. McIntosh:

We're writing in support of Ontario Nature's commentary on this proposed strategy, and to emphasise certain points that we consider important to the future of Ontario wetlands.

First, we urge the **protection of small wetlands** in a way that has them well dispersed across the landscape, both to provide metapopulation connection between larger wetlands, and to protect species which require small wetlands to survive, such as, in the case we've most studied, [Chorus Frogs](#).

Second, because previous attempts to restore wetlands have been problematic, there should be generous funding for **study of the features & functions of anthropogenic wetlands**, both intentionally created (e.g. as waterfowl habitat by Ducks Unlimited), and as the unplanned side-effects of other activities such as the abandonment of gravelpits.



[A Provincially Insignificant Wetland where Chorus Frogs haven't been heard since 1998](#)

Thirdly, wetland augmentation should be directed towards **sites already degraded by human activity**. In planning for the closure of gravelpits and other openpit operations, priority should be given to creation of ponds and wetlands designed to benefit species of Amphibians, Snakes, and Turtles appropriate to the site. The policy should especially encourage the restoration of the boggy character of all places where peat moss has been removed, by reflooding the exploited

areas to maximize both biodiversity and carbon sequestration in newly formed peaty sediments.

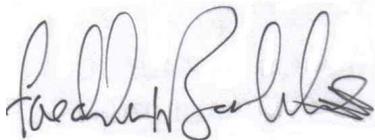
Implementation of Ontario Nature's "*Recommendation 9: ...the evaluation of significance must precede development approvals to ensure that no unevaluated PSW is negatively impacted.*" - ...should include a provision that ***draining of wetlands to preclude their classification should be prosecuted*** as a fraud/conspiracy/destruction-of-evidence sort of crime.

An innovative way of increasing the extent of wetland in Ontario would be a provincial initiative to restructure the relationship between municipalities & their human and castorine wetland workers. Provincial support for raising roadbeds and inventing & installing improved Beaver baffles could maximize the number and extent of Beaver impoundments all across southern Ontario, and reduce the effort currently expended in combating Beavers at culverts. Such a policy would ***facilitate Beaver-flooding of all potential sites for wetlands*** (of course excluding ANSIs with features which shouldn't be flooded, agricultural fields, and existing residential & commercial infrastructure).

Finally, in our 1994 book, ***A Place to Walk***, we noted the elimination of wetlands in cities along the Lake Ontario shore, and hope that a provincial wetland policy will emphasise the ***expansion and protection of wetlands in settled and urban areas.***

As Ontario Nature says: "*The development of a wetland conservation strategy for Ontario presents a significant and welcome opportunity to improve the state of Ontario's biodiversity and to mitigate and enhance our resilience to the impacts of climate change. Public support for the strategy will depend, however, on addressing the issues... and setting a clear policy direction aimed unequivocally at reversing the ongoing trend of wetland loss in Ontario.*"

hopefully,



Frederick W. Schueler, Ph.D.
Research Curator



Aleta Karstad
Museum Artist



[A wetland where the boundary between drainage basins is controlled by Beaver dams in road culverts](#)