

November 14th 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,

The Greenspace Alliance of Canada's Capital is writing in support of Ontario Nature's commentary and that of Fragile Inheritance Natural History on this proposed strategy, and to emphasize certain points that we consider important to the future of Ontario wetlands. The first being all wetlands should be protected by law be they big or small, bog or open water wetland. A detailed proposal for destroying or modifying a wetland should be the object of an official request to MOE or your Program.

In agreement to FINH, small wetlands should be protected « 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 FINH has most studied, Chorus Frogs ». As of last year the federal government has declared the Chorus Frog habitat protected in Québec and is also looking at protecting it in Ontario after ongoing studies.

Restoring wetlands once they have been destroyed is not always simple, since restoring original drainage and soil composition is very difficult ; « 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. »

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 should be prosecuted as a fraud/conspiracy/destruction-of-evidence sort of crime but also that any person wanting to drain a wetland must obtain **a written authorization from your ministry with detailed mitigation or restoration requirements if request is granted to damage wetland.**

Municipal official plans should identify all wetlands and possible restoration sights including beaver ponds. So if anyone requests permission to destroy or modify a wetland, the city could propose areas where wetland restoration could be done or created, starting with gravel pits and other openpit operations as suggested by FINH.

As for agricultural land, a compensation program should be set up to compensate farmers who protect wetlands on their lands.

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."

Paul Johannis

Nicole DesRoches