



August 28, 2024

The Honorable Graydon Smith
Minister of Natural Resources
Unit 2.04/2.05 230 Manitoba St.
Bracebridge, ON P1L 2E1

Sent by Email

Dear: Graydon Smith

RE: Province Removes Wetlands Protection for Eastern Ontario

The Council of the Corporation of Tay Valley Township at its meeting on August 13th, 2024, adopted the following resolution:

RESOLUTION #C-2024-08-11

MOVED BY: Wayne Baker
SECONDED BY: Angela Pierman

“THAT, the Council of the Corporation of Tay Valley Township urge the Provincial Government to reopen the wetlands regulation consultation for the Rideau Valley Conservation Authority (RVCA) to:

- allow Tay Valley’s wetlands to receive the same protections as wetlands in the other 29 Conservation Districts in Ontario; and
- ensure Tay Valley’s \$1.3 Billion Tax Assessment is protected from degradation.

THAT, landowners be compensated by the Province when wetlands are designated on their property,

AND THAT, this resolution and a copy of Report #PD-2024-10 – Province Removes Wetlands Protection for Eastern Ontario, be provided to the Minister of Natural Resources, to area Members of Provincial Parliament (MPPs), the Rural Ontario Municipal Association (ROMA), and to all Ontario Municipalities.”

ADOPTED



A detailed report is included.

If you require any further information, please do not hesitate to contact the undersigned at (613) 267-5353 ext. 130 or deputyclerk@tayvalleytwp.ca

Sincerely,



Aaron Watt, Deputy Clerk

cc: Minister of Natural Resources Graydon Smith,
John Jordan, MPP Lanark-Frontenac-Kingston,
Rural Ontario Municipal Association (ROMA),
and to all Ontario Municipalities

/Enclosure

COMMITTEE OF THE WHOLE
August 13th, 2024**Report #PD-2024-10**
Noelle Reeve, Planner**PROVINCE REMOVES WETLANDS PROTECTION FOR EASTERN ONTARIO****STAFF RECOMMENDATION(S)**

It is recommended:

“THAT, the Council of the Corporation of Tay Valley Township urge the Provincial Government to reopen the wetlands regulation consultation for the Rideau Valley Conservation Authority (RVCA) to:

- allow Tay Valley’s wetlands to receive the same protections as wetlands in the other 29 Conservation Districts in Ontario;
- ensure Tay Valley’s \$1.3 Billion Tax Assessment is protected from degradation.

AND THAT, this resolution and a copy of Report #PD-2024-10 – Province Removes Wetlands Protection for Eastern Ontario, be provided to the Minister of Natural Resources, to area Members of Provincial Parliament (MPPs), the Rural Ontario Municipal Association (ROMA), and to all Ontario Municipalities.”

BACKGROUND

On April 1, 2024, the province enacted *Ontario Regulation 41/24: Prohibited Activities, Exemptions and Permits*. This regulation replaced 36 individual conservation authority regulations with a single provincial regulation. The O. Reg was intended to bring consistency to the conservation authority regulations. It also reduced the area around provincially significant wetlands where a permit is required from 120 to 30m.

In early June 2024, the Rideau Valley, South Nation and Raisin River conservation authorities began public consultations on regulating all wetlands, to be in conformity with the regulations of the other 29 conservation authorities in the province. On June 25, 2024 the press secretary for the Minister of Natural Resources (MNR) stated, “The province has instructed Rideau Valley, Raisin River, and South Nation Conservation Authorities to permanently stop their implementation plans regarding their wetland policy and mapping updates”.

DISCUSSION

We live in what is often referred to as the Anthropocene (a unit of geologic time, used to describe the most recent period in Earth's history when human activity started to have a significant impact on the planet's climate and ecosystems). As a result of the impact of human activity on the environment, the economy is more closely tied to the health of natural systems, such as wetlands, than at any time in the past.

For example, Tay Valley Township's tax assessment for 2024 is \$1.3 billion (which is grossly undercounted as the provincial government has not increased this assessment for almost a decade, since 2016). Close to three-quarters of this tax base is generated by the economic value of waterfront properties. Anything that degrades the ecological value of the lakes and streams on these properties, or the biodiversity in Tay Valley Township degrades Tay Valley's tax base.

Leaving wetlands unprotected will degrade the value of these properties and, therefore, the Township's economy. Wetlands filter nutrients out of water. Wetlands lessen the effects of climate disruption including rising temperatures by sequestering (storing) carbon. Wetlands also reduce the effects of extreme rain events and flooding by retaining water in the special soils of these low-lying areas. Wetlands reduce the impacts of drought by slowly releasing the stored water to groundwater systems.

This year, for the first time ever, a lake in Tay Valley Township was confirmed by the Ministry of Environment Conservation and Parks to have a blue-green algae outbreak. Blue-green algae is caused by increased nutrients washing into lakes during rainstorms and by increased water temperatures.

The province's information page on blue-green algae [Blue-green algae | ontario.ca](#) describes initiatives it is taking to reduce blue-green algae blooms in southern Ontario including "Investing \$30 million through the [Wetlands Conservation Partner Program](#) to support conservation organizations to enhance and restore wetlands".

While for southern Ontario, the province recognizes the values of wetlands to: "reduce nutrient run off; improve water quality; improve and increase habitats; and increase biodiversity", in eastern Ontario the province is prohibiting protection of wetlands that the 29 other conservation authorities provide.

Three-quarters of wetlands have been lost in southern Ontario since European settlement. This difference in treatment of wetlands in eastern Ontario feels like the province only cares about wetlands after they are destroyed when they require millions more dollars to recreate (at a lower level of ecological integrity). Protection of the services wetlands provide is cheaper and better for the fish, waterfowl and mammals that rely on them.

The province also has recognized the value of wetlands as green infrastructure. Ontario's Regulation 588/17, which mandates the inclusion of natural assets in asset management planning, marks a significant change in infrastructure governance. It positions Ontario as the first and only Canadian province to enforce natural assets as a required component of asset management planning at the municipal level.

By identifying and harnessing the value of natural assets and their associated services, municipalities can enhance the resilience and effectiveness of their infrastructure systems. Green infrastructure, including wetlands, provides a variety of services, including storm water management, recreation, and climate resilience which result in economic benefits, as they provide multiple services at a lower cost than grey infrastructure, which is typically built for a singular purpose.

The province has also identified planning at the watershed scale as a goal in the Provincial Policy Statement. Sustainable watershed planning depends on conserving wetlands.

OPTIONS TO BE CONSIDERED

Option #1 (Recommended) – Council supports the motion to urge the Provincial Government to reopen the wetlands regulation consultation for the Rideau Valley Conservation Authority (RVCA) to:

- allow Tay Valley’s wetlands to receive the same protections as wetlands in the other 29 Conservation Districts in Ontario;
- ensure Tay Valley’s \$1.3 Billion Tax Assessment is protected from degradation.

And to share the motion and this report with the Minister of Natural Resources, area MPPs, ROMA, and all Ontario Municipalities.

Option #2 – Council supports some of the motion and suggests changes.

FINANCIAL CONSIDERATIONS

None, at this time. However, the loss of wetlands will contribute to increased infrastructure costs in the future from flood impacts.

STRATEGIC PLAN LINK

Healthy Environment – The motion encourages protection of wetlands which supports ecosystem health and protects biodiversity.

Sustainable Finances – The motion encourages protection of wetlands which supports the province’s requirements to include green infrastructure in asset management.

Thriving Culture, Economy and Tourism - The motion encourages protection of wetlands which supports the water quality of the Township’s lakes and streams which provide economic value via the Township’s tax base and tourism.

CLIMATE CONSIDERATIONS

The motion can assist Tay Valley’s ability to mitigate climate disruption by maintaining the ability of wetlands to sequester carbon, mitigate floods and droughts, and maintain the tremendous biodiversity represented in Tay Valley Township by the overlap of ecozones represented by The Land Between and the Frontenac Arch Biosphere.

CONCLUSIONS

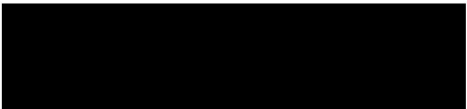
Tay Valley Township supports the mapping of wetlands in eastern Ontario and public consultation on draft mapping. Mapping of wetlands and protective regulations (30m setback as is required by most municipalities from a waterbody or stream) are key for preventing the further loss of the crucial natural heritage feature that wetlands represent. The conservation of wetlands has been shown elsewhere to provide greater economic and resource value to a property or an area than the physical development of that property.

The water filtration, flood and drought mitigation, carbon sequestration and biodiversity values of wetlands are far more costly to try to recreate than to protect, as southern Ontario and other jurisdictions have proven.

ATTACHMENTS

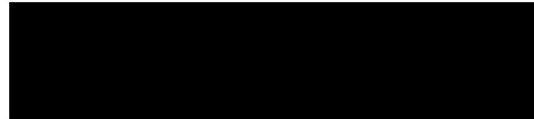
- i) Wetlands Soak Up Climate Change (Climate Network Lanark)
- ii) Natural Credit Estimating the Value of Natural Capital in the Credit River Watershed (Credit Valley Conservation and The Pembina Institute)
- iii) Eastern Ontario Climate Change Projections (Ontario Centre for Climate Impacts and Adaptation Resources/Climate Risk Institute)

Prepared and Submitted By:



**Noelle Reeve,
Planner**

Approved for Submission By:



**Amanda Mabo,
Chief Administrative Officer/Clerk**

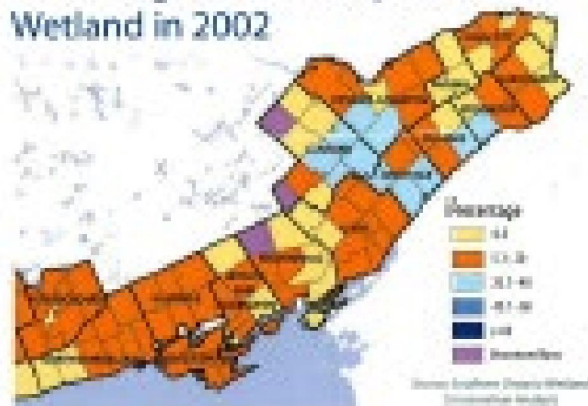
WETLANDS Soak Up Climate Change

Lanark County, as home to one of the last large collections of wetlands in Southern Ontario, has a special responsibility to preserve and protect them.

Wetlands provide essential services for nature and people.

They store carbon, protect us from floods, provide water for consumption, and support an abundance of life – of birds, wildlife and flora. But they are under threat and are being lost faster than any other ecosystem, mainly for development and farming.

Percentage of Township as Wetland in 2002



Twenty-five percent of Canada's remaining wetlands (6% of wetlands world-wide) are found in Ontario. – OMNR 2009



CLIMATE
NETWORK
LANARK

climatenetworklanark.ca

"Wetlands are some of the most effective of nature's climate control mechanisms. Wetland plants ... collect huge amounts of carbon dioxide. Lanark residents must be vigilant and preserve wetlands rather than drain them. ... Wetland drainage must stop, with compensation for landowners, if required."

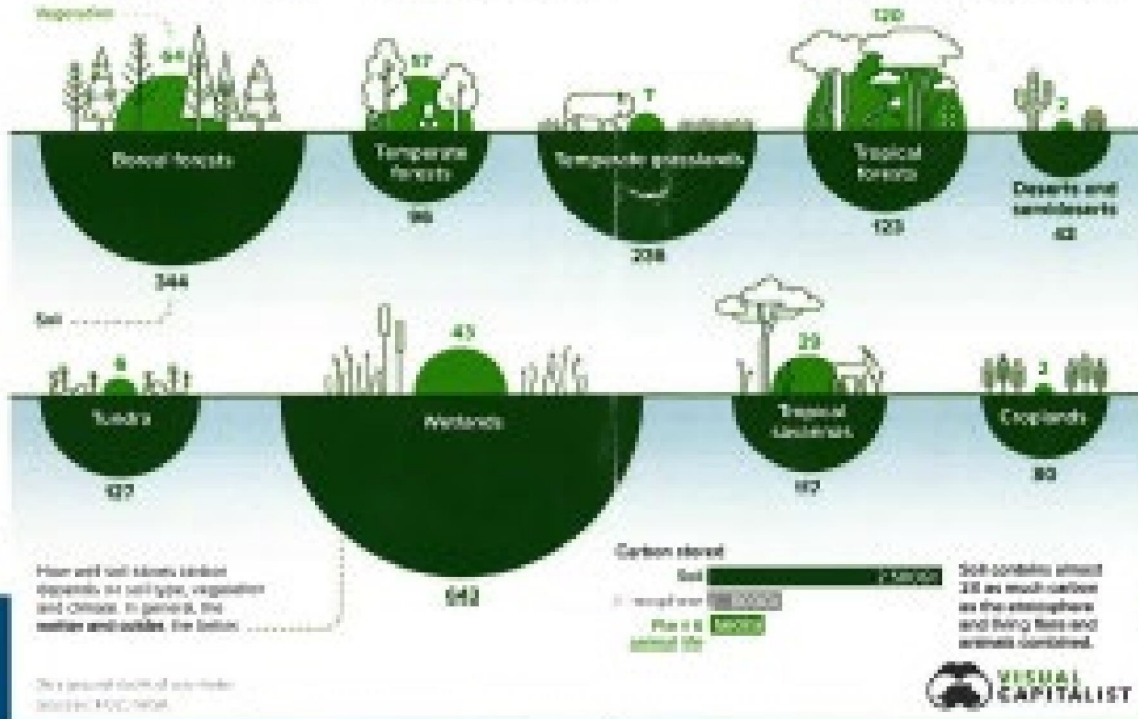
– Dr. Paul Kaddy, Lanark County Green Gems
dpaulkaddy.com/conservation/lanark-county

How Wetlands Store Carbon

Carbon Storage Tonnes of Carbon per Hectare*

The world's forests absorb around 15.8 gigatonnes of CO₂ each year. That's around 24% the annual CO₂ emissions of the United States.

Wetlands absorb 8.7 gigatonnes of CO₂ (twice that) back into the atmosphere due to deforestation, fires and other disturbances.



How and how much carbon depends on soil type, vegetation and climate. In general, the wetter and colder, the better.

Soil contains almost 28% as much carbon as the atmosphere and being lost and eroded contributes to climate change.

Call to Action: Save Lanark County Wetlands

- Ask your provincial and municipal candidates about how they will protect our WETLANDS.
- Identify and explore WETLANDS in your area.
- Talk to neighbours and friends about the importance of WETLANDS.
- Join CLIMATE NETWORK LANARK.



CLIMATE NETWORK LANARK

climatenetworklanark.ca



"Calling it Climate Change is rather limiting. I would rather call it everything change."

- Margaret Atwood

Attachment ii) Natural Credit Estimating the Value of Natural Capital in the Credit River Watershed (Credit Valley Conservation and The Pembina Institute)

NATURAL CREDIT

FACT SHEET

Photo-illustration David Dodge & Robert Weidemann

Estimating the Value of Natural Capital in the Credit River Watershed

The Credit River Watershed provides at least \$371 million per year in ecological services to the residents of the watershed

Without nature, humans could not survive. Nature provides the raw materials for every product we consume. More importantly, it constantly supplies services that sustain life, such as fresh drinking water, food and clean air. Nature directly affects human well-being through its ability to meet a wide variety of human needs, whether from tangible ecological services or from more abstract, psychological connections to nature.

Unfortunately, current accounting systems rarely, if ever, account for nature. In fact, we often assume nature provides unlimited resources, such as fisheries, forests and clean drinking water. We act as if the bank of nature has unlimited assets, and we keep making withdrawals as if there is no tomorrow.

By accounting for natural capital we can start to align our economic ambitions with our ethical environmental responsibility—to provide future generations with at least the same benefits from nature we enjoy. This is the foundation of sustainability.

The Pembina Institute worked with Credit Valley Conservation (CVC) to assess the value of natural capital in the Credit River Watershed. This work is an important component of the information CVC needs to effectively manage ecological resources in the watershed. Given its proximity to the major urban centres of Toronto and Mississauga, the Credit River Watershed faces threats to its natural heritage from resource use and land-use change.

About the Credit River Watershed

The Credit River flows from its origins in Orangeville to Lake Ontario at Port Credit in the City of Mississauga. The watershed covers an area of almost 1,000 square kilometres and has a population of 757,600. The Credit River Watershed is also an important sub-component of the Great Lakes Basin. Its most notable natural capital resources include wetlands, upland forests and water.

Natural Capital

Natural capital consists of the assets of natural ecosystems whose very presence yields a flow of ecological services. This concept was derived from the same notion that we use to treat other forms of capital in our society (financial and human).

Ecological Services

Ecological services are the benefits that society enjoys from the presence of functioning natural ecosystems. Ecological services provide, for free, many of the functions that we currently substitute with man-made processes, such as waste treatment, carbon sequestration and air purification.

www.greeneconomics.ca

Photo: istock



Natural capital saves watershed taxpayers \$100 million in water supply costs every year

Natural capital builds on the notion that Mother Nature does for free what we would otherwise have to pay millions of dollars to do through technology and infrastructure. When we allow growth, pollution or other impacts to compromise these valuable services, that lost value is ultimately borne by taxpayers. Those costs are not accounted for in the way we do business today. This study helps demonstrate that it is possible to come up with real numbers that can inform discussions about land use and development. For example, this study estimated that if we were to compromise our groundwater supply it would cost more than \$100 million per year to pump water from Lake Ontario. And that is just to maintain current water use.

Wetlands provide natural waste treatment, climate regulation and water supply services for free—remove the wetlands and you lose the services.

Value of Natural Capital in the Credit River Watershed

LAND COVER	UPLAND FOREST	RIPARIAN FOREST	WETLAND	WATER	URBAN FOREST	MEADOWS	AGRICULTURE	TOTAL
Ecological Services	Atmospheric Regulation Climate Regulation Disturbance Avoidance Water Regulation Water Supply Pollination Habitat Recreation	Atmospheric Regulation Climate Regulation Water Supply Waste Treatment Pollination Biological Control Habitat Biodiversity Recreation Culture	Climate Regulation Water Regulation Water Supply Soil Formation Nutrient Cycling Waste Treatment	Water Regulation Water Supply Soil Formation Waste Treatment Habitat Biodiversity Recreation	Atmospheric Regulation Climate Regulation Water Regulation Water Supply Recreation Culture	Climate Regulation Pollination Habitat Recreation	Climate Regulation Pollination Habitat	
Estimated value (\$ per capita per year)	94	67	247	19	25	10	28	490
Estimated annual value (\$ millions)	70.9	51.0	186.8	14.5	18.7	7.8	21.4	371.1



Scenario Analysis

How changes in land cover affect the flow of nature's services

The natural capital of the Credit River Watershed is extremely valuable. But we would have to do a serious study of incremental changes in the value of natural capital to create a precise decision-making tool. To demonstrate the value of natural capital, we created two simple scenarios to test how natural capital might change in value.

To assess how natural capital would be affected by changes in land-use we compared the existing natural capital to the expected natural capital under two land-use scenarios: urban development and reforestation and naturalization.

URBAN DEVELOPMENT: In a recent study conducted by CVC some future urban development scenarios were defined. The scenario explored here includes increasing the urban land cover from 15% to 25% of the watershed, while using current best management practices.

REFORESTATION AND NATURALIZATION: In 2007, CVC articulated a 10-year capital plan, in which it set aggressive reforestation and naturalization goals. CVC expects to plant 2.5 million seedlings (reforestation), and 317,000 trees and shrubs (naturalization) by 2017 as part of a climate change strategy.

Uninformed Decision-Making

We arrived at a value for the existing natural capital by comparing the existence of a particular ecological service to its absence. This approach has been used in a number of instances in Canada. The approach taken in this study is important for demonstrating that our natural environment has significant value, but its usefulness for decision-making is limited. Policy decisions are usually made on what economists call the "margin," which refers to incremental changes rather than the absence or presence of an ecological entity.

Our findings demonstrate that Canada needs to establish a national framework to conduct this type of work. Without this information decision-makers are often left to consider only the information before them. In many cases this would be economic information related to industrial benefits and not ecological benefits.



The Credit River flows from its origins in Orangeville to its mouth at Port Credit on Lake Ontario.



Photo: CVC

Urban forests provide water regulation and supply, waste treatment, and other services worth \$19 million every year in the Credit River Watershed.

Scenarios: Changes in Natural Capital Values

Change in Natural Capital Value (\$ millions per year)	LAND COVER	UPLAND FOREST	RIPARIAN FOREST	WETLAND	WATER	URBAN FOREST	MEADOWS	AGRICULTURE	TOTAL
Urban Development		-6.5	-3.9	-14.8	N/A*	N/A*	-0.8	-4.9	-30.8
Reforestation Naturalization		7.6	5.5	N/A*	N/A*	1.3	-0.7	-0.4	13.2



Urban development comes at a significant cost because valuable services provided by nature are lost.

* Not applicable because of the limitations of the scenario

Investments in reforestation and naturalization can increase the value of the natural capital in the Credit River Watershed, thereby providing significant benefits to residents.

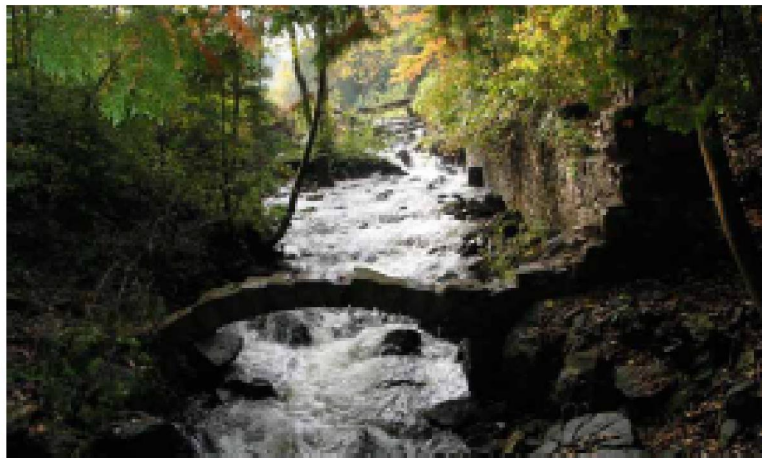


Photo courtesy CVC

Investments in Forests Pay Dividends

As urban development proceeds there is a real cost to natural capital. The risk is that higher value land cover types, such as wetlands, which have an annual economic value of \$187 million, could be jeopardized. However, restoring natural landscapes can be shown to provide clear benefits to society. Based on the analysis done in this report, if CVC invests the \$8 million over 10 years to plant trees and shrubs on abandoned and degraded lands, the return to society is over \$13 million per year. An approach like the one used in this study can help measure the costs of urban development and the economic benefits of conservation initiatives such as reforestation and naturalization. Further, this type of work can turn the balance sheets around on how businesses and governments approach nature.

Bank of Nature Earns High Interest

The natural capital of the Credit River Watershed delivers a sustainable flow of services to society on the order of at least \$371 million per year.

- Wetland services were found to be the most valuable in the watershed, returning an annual flow of benefits worth a minimum of \$187 million per year.
- The current mix of forests in the watershed composed of upland forests, riparian forests and urban forests return a minimum of \$71 million per year, \$51 million per year and \$19 million per year, respectively.
- Water benefits in the Credit River Watershed are at least \$15 million per year.

There are a number of potential development patterns that could emerge in the Credit River Watershed. The results of our analysis indicate that if the residents of the watershed want to enhance the value of natural capital in the watershed then a focus on reforestation and naturalization can return some very big gains over the next 10 years. We estimate that a reforestation and naturalization plan will return more than \$13 million per year to the residents of the watershed. Conversely, if urban development progresses along current trajectories from 15% urbanization today to 25% urbanization, we can expect losses to natural capital of about \$31 million per year.

Conservative Estimates

The natural capital values reported in this study should be considered a lower bound for three main reasons:

1. **Only values to watershed residents were considered.** It is possible that some people outside the watershed value the Credit's natural capital.
2. **Existing data allowed for estimation of only a small selection of the ecological services.**
3. **In cases where data limitations forced us to make assumptions, the most reasonable conservative assumption was applied.**

Want More Information

For more information on the analysis conducted by the authors please download the full technical report *Natural Credit: Estimating the Value of Natural Capital in the Credit River Watershed* from: www.greeneconomics.ca, www.pembina.org or www.creditvalleyca.ca.

Also, please feel free to contact the authors:

Mike Kennedy, Senior Resource Economist,
Pembina Institute: mikok@pembina.org

Jeff Wilson, Ecological Goods and Services
Project Coordinator, Credit Valley Conservation:
jwilson@creditvalleyca.ca



www.greeneconomics.ca

Attachment iii) Eastern Ontario Climate Change Projections (Ontario Centre for Climate Impacts and Adaptation Resources/Climate Risk Institute)

Summary

Climate Variable	Projected Change – 2050s
Annual Air Temperature	+ 2.7°C
Winter Air Temperature	+ 3.1°C
Summer Air Temperature	+ 2.5°C
Annual Precipitation	+ 5.8 to 5.9%
Winter Precipitation	+ 11 to 11.6%
Summer Precipitation	+ 1.6 to 2.7%

Summer 2017 Flooding MVCA photo



Photo 55 Downstream View of Bennett Dam