



## Planning St. John's

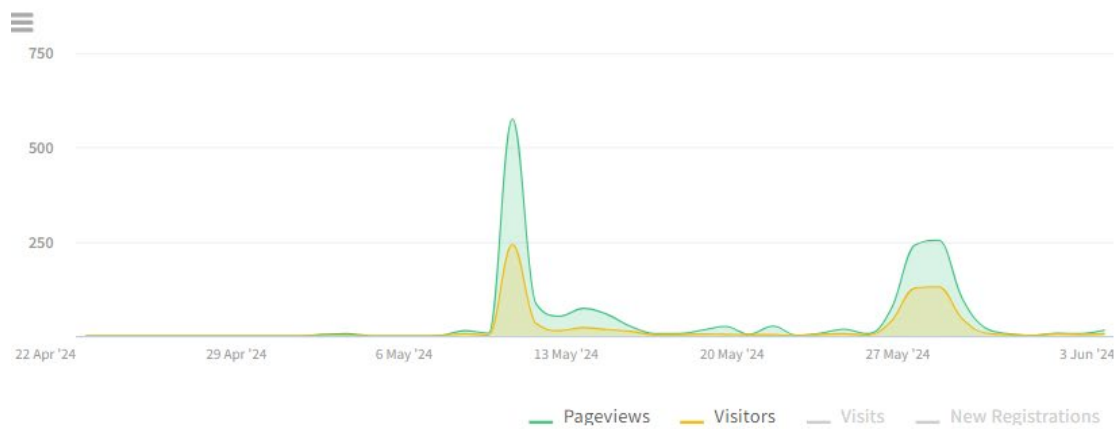
### [EngageStJohns.ca](https://EngageStJohns.ca) Report

### Text and Map Amendment - Wetlands

#### Visitors Summary

City Of St John's from 22 Apr'24 to 04 Jun'24

DAILY MONTHLY



#### Highlights

TOTAL VISITS	MAX VISITORS PER DAY	NEW REGISTRATIONS
816	242	8
ENGAGED VISITORS	INFORMED VISITORS	AWARE VISITORS
25	192	683

Types of visitors:

- Total visits: unique sessions (may be the same person visiting multiple times)
- Aware: visited at least one page
- Informed: has taken the "next step" from being aware and clicked on something
- Engaged: has contributed to a tool (comment or question)

<b>Comments (verbatim)</b>	<b>What is your overall feedback of this application?</b>
<p>I am pleased to see a more comprehensive wetlands map. I hope this signals Council’s commitment to preserving them. But it is shocking to see how many wetland areas remain to be assessed! Time to get moving on this.</p>	<p>Support</p>
<p>'On the map Kent's Pond is mislabelled as Kenny's Pond and Kenny's Pond isn't labelled.</p> <p>There are a number of St. John's rivers, or portions of rivers, that have been buried in culverts. Although these waterways are out of sight, they continue to be an important part of our wetlands. These rivers should be shown on on the map, probably in the category of 'Wetlands Unprotected' or 'Wetland Further Study Required'. Some examples of these rivers are Kelly's Brook, Virginia River (east branch which runs under the greenbelt paralleling MacDonald Drive), Mundy Pond River (from Mundy Pond, through Victoria Park, to the Harbour), the river from Lundrigan's Marsh to Virginia</p>	<p>Mixed</p>

<p>River paralleling Logy Bay Road), portions of Leary's Brook; there are others but being an east-end boy I'm not as familiar with the engineering travesties carried out throughout the whole City. The value of showing these as wetlands -</p> <ul style="list-style-type: none"> <li>- these waterways continue to be an integral part of our wetlands network and should be recognized as such</li> <li>- the possibility of future remediation - a long term possibility - listing will avoid 'out-of-sight; out-of-mind'. Remediation/restoration is possible as evidenced by the restoration of the eastern portion of Kelly's Brook adjacent to the Ball Park.</li> <li>- raise consciousness to avoid any future destruction/culverting of our valuable rivers.</li> </ul>	
<p>I think all wetlands are very important specially with climate change ... they are earths natural sponge, which helps with flooding. The complete removal of all trees, and even the soil for the development of subdivisions is in my opinion a crazy idea... therefore, a more natural approach should be taken when it comes to development, using wetlands and leaving so much vegetation is important.... I know this is not what the developers want to hear?.</p>	Mixed
<p>Our wetlands are an integral part of the ecosystem around the city and help to increase the natural beauty and biodiversity we experience in the city. Studies show that regular interaction with nature increases well being. As a child and teenager having wild, untouched areas nearby my house in the suburbs that my friends and I could go and play together was very important. I would go so</p>	Oppose

<p>far as to say they were my best teenage memories. It gave the suburb more of a community feeling and gave it some character. Suburbs need more community centres in general to keep people engaging with each other, the forests and wetlands and parks in the area help do that in place of a community centre.</p> <p>Aside from the community, recreational, well being improving aspects of forests and wetlands, they are also critical for flood prevention, act as a carbon sink against climate change, and help control the health of our natural river systems. Removal and paving over of wetlands to create more soulless suburbs for development would actively harm the ecosystem, the community, and the mental health of those around the area and those that were to live in and grow up in the developed area. If these wetlands were developed for affordable housing, maybe i would select mixed instead of oppose, but given the current and past actions of city council i have NO faith this would be the outcome.</p>	
<p>Please protect important wetlands over short term development aspirations. Do not place the wetlands that require further investigation under a "unprotected by default" approach, Instead follow the precautionary principle to wetlands. Recognize the threat of serious and irreversible damage that can occur as a result of this decision and consequential downstream effects (excuse the pun). Do not allow a lack of full scientific certainty to lead you to a decision that leaves these vulnerable environments victim to</p>	Oppose

<p>careless development and human action. You must demand comprehensive environmental assessments.</p> <p>You have a responsibility to these spaces, as they are important to the character of Newfoundland and all the living creatures that enjoy their benefits. please ensure you respect and protect them, stop selling them out for another parking lot.</p>	
<p>Wetlands are essential and must remain protected. Furthermore, considering that the majority of wetlands appear to require further study and no timeline has been established for this, it would be ill-advised to proceed with changes at this time.</p>	Oppose
<p>Please do not remove protections from wetlands.</p>	Oppose
<p>Protect the wetlands</p>	Oppose
<p>In light of how important a role all wetlands play in our ecosystem, I feel based on the number of as of yet unassessed wetlands it may be presumptuous to set 6 and up as the cutoff for wetlands protection. It is easy to imagine, based on the idea that 5 would be an average score on a scale from 1 to 10 (Forgive me if that is not the case for the WESP-AC scale, I only skimmed the manual), that we would sacrifice half of our as of yet unassessed wetlands at this juncture now.</p>	Oppose

Public Q&A Question (verbatim)	Public Response
Can we see the previous map to see the changes? and who is recommending these changes thanks	Yes, the current map is now under Documents or you can view it here. The City is recommending these changes to bring the Development Regulations in line with Council's decision to protect wetlands with a WESP-AC score of 6 or higher, and the adoption of the Wetlands Study Phase 2A.
The map isn't large enough to see, can't it not be downloadable in PDaf at a higher format so people can actually see and read it?	A PDF of Map 4 can be found under Documents or by clicking here.
How is the scoring of wetlands determined?	This is outlined in the Wetlands Study Phase 2A, which can be found under Documents.
It would be nice to see an overlap between the proposed changes and what is in place now. Also with the proposed change how much infrastructure will have to be put place to accommodate the infill of wetlands / marshes / etc	You can view the current Map 4 and proposed Map 4 here. The link to the comparison map tool is also under Important Links titled "Wetland Map Comparison".

<p>The before- and after-maps differ in the categories shown, preventing comparison. Could a single map that shows which areas are going from unprotected to protected, and from protected to unprotected, be provided? Thank you!</p>	<p>You can view the current and proposed Map 4 here. The link to the comparison map tool is also under Important Links titled "Wetland Map Comparison".</p>
<p>Can you identify which areas that weren't protected will now be protected or which areas that were protected will now not be?</p>	<p>You can view the current Map 4 and proposed Map 4 here. The link to the comparison map tool is also under Important Links title "Wetland Map Comparison". The wetlands that will be protected are shown in red on the proposed Map 4 and using the comparison map tool you can see how that area has changed. The wetlands that will be unprotected are shown in grey on the proposed map 4. Again, using the comparison map you can see how the area has changed if you zoom into those areas.</p>
<p>Is there a timeline re the wetland areas indicated as requiring further study?</p>	<p>A timeline has not been established.</p>

<p>Can the City provide the scientific explanation for use of the WESP-AC as tool for determining whether a wetland should be protected or not?</p> <p>Can the City provide any scientific support for, or examples of the WESP scoring cut-off (i.e., &lt;6) method the City is using to determine which wetlands should not be protected?</p> <p>What is the justification for not protecting wetlands in watersheds that already experience flooding, and that are projected to experience greater flooding (e.g., Waterford River watershed, Leary's Brook watershed), when their role in flood mitigation is well understood?</p>	<p>Please refer to the Wetlands Study - Phase 2A. There is information on the WESP-AC and the scoring system in that report.</p>
<p>If, on the old map, a zone was marked as having Wetland category "bog", was it "protected"? Ultimately, I'm hoping that you can clarify whether all areas on the "current Map 4" that are highlighted as having one of any of the "Wetland" categories, were all "protected". In other words, if an area on the "current Map 4" was assigned any of the "Wetland" categories, were they previously considered "protected"?</p>	<p>The categories of wetlands on the current Map 4 (Bog, Fen, Marsh, Swamp) are all protected.</p>



<p>My understanding is that areas marked as "Wetland - Unprotected" on the "proposed Map 4" are areas that were previously protected, and will have that protection status removed. Is that the correct interpretation? Thank you.</p>	<p>Yes, that correct. The exact areas shown as "Wetland - Unprotected" may differ slightly from what is shown on the current Map 4 because those wetlands were field assessed as part of the Wetlands Study Phase 2A.</p>
<p>Given the large number of "further study required" wetlands, the effectiveness of the amendment is closely tied to undertaking that work. Has the further study work been planned/budgeted? Thanks!</p>	<p>A timeline for further assessment has not yet been established.</p>
<p>Firstly just for clarification regarding the areas designated "requiring further study" in yellow on the proposed map, will they be treated as protected while further assessments are taking place? As noted earlier there's no timeline for further assessments. Secondly, according to the map 4 proposal, the largest losses of protection will be wetlands that are in very close proximity to urban/residential areas. Is there a justification for removing their protected status beyond not having scored above 6 on the report's scale? For example, SL-9 Southlands, as noted by the report, "While it did not score High on as many wetland functions as some</p>	<p>Yes, the wetlands that require further study are protected until further assessment is completed and an amendment to Map 4 is also completed. The change in status is based on the scoring.</p>

<p>other sites based on the WESP-AC protocol, this study highlights that there are few wetlands of this size remaining adjacent to the developed areas of St. John's that have not yet been extensively altered. It is also associated with several watercourses and it is recommended to establish a 20 m buffer around this entire wetland..." Loss of protections for urban wetland systems seems very shortsighted, considering the benefits wetlands provide are needed the most in urban areas.</p>	
<p>Is there a deadline for comments?</p>	<p>The deadline for comments was May 28, 2024. The question and answer section will remain open.</p>
<p>The "Wetland Study Report (Oct 11, 2023)" referenced as part of this proposal explains the weighting scheme devised by the City in its assessment of the overall WESP-AC score, as follows:          "Hydrologic Grouped functions are assigned a weight of 0.4; Water Quality Support Grouped functions are assigned a weight of 0.3; Aquatic Support Grouped functions are assigned a weight of 0.15; Aquatic Habitat Grouped functions are assigned a weight of 0.10; and</p>	<p>Thank you for your submission. I will forward your questions pertaining to the Wetland Study to the Manager of Development - Engineering. The City is proposing to update Section 4.10 to accurately reflect and explain the changes that are being proposed to Map 4.</p>

Transition Habitat Grouped functions are assigned a weight of 0.05."

This weighting scheme, chosen by the City: (a) favours (40% weight) infrastructural-relevant metrics (water retention ("Hydrologic Group")); (b) heavily weighs the "water quality" metric (which few wetlands in St. John's have high scores for anyway due to low pollution in our City, which by weighting by 30% thereby dilutes the resulting score); (c) significantly suppresses the contribution from environmental factors (only 30% in total contribution from the remaining 3 categories).

The chosen score weighting scheme thus appears designed to favour the removal of wetland protections.

Would you have any documentations from independent environmental experts regarding this weighting scheme? Would you have any documentation from independent environmental experts regarding whether a score of "6", under

<p>this custom weighting scheme, is an environmentally sound cut-off for protection?</p> <p>Neither of these important questions are addressed in the cited report. The report merely states the outcome of the work performed, as contracted by the City. Importantly, *how* the final scores were computed, and *how* they were used by the City to write the proposed regulatory change to Section 4.10, are not addressed in the cited report.</p> <p>While it is great that this update to the map has been performed, there does not appear to be a sound case made for why section 4.10 of the regulation should also be changed. Can a new proposal be present where those two independent changes are decoupled from each other?</p>	
<p>Wetlands provide values that no other ecosystem can. This should be taken into consideration before making any further decisions.</p>	<p>Thank you for your submission. The decision to protect all wetlands with a WESP score of 6 or higher was made by Council on November 28, 2023. Please note your questions and comments regarding the Wetlands</p>

According to Table 5 of the 'Wetlands Study – Phase 2A' document, only out 11 out of 67 field sides will be protected!

These are very scary numbers considering that all 67 are protected now!

Looks like more analyses are needed to understand why and if the biodiversity/quality of wetlands decreased. And instead of classifying the remaining 56 field sites as unprotected, we must focus on restoring the quality of these wetlands.

I wonder if any Biology professors have been involved in the assessment/ranking of the wetlands. Are there any scientists who can take responsibility to confirm that some particular fields are not important and therefore should not be protected anymore?

Where does the number 6 come from to define the borderline to classify the fields? I see some 'Moderate' ranked fields having the score of 4.99 and 4.83. Does it mean that even a 'Moderate' rank is not enough to be protected?

Study have been referred to the Manager of Development - Engineering for review and comment.

<p>Can we be 100% sure that removing 'Low' and 'Low-moderate' fields from our protection, will not result in a further decrease in biodiversity in NL in general?</p> <p>Was any analysis done to assess the consequences of moving 'protected' to 'unprotected' for other neighboring ecosystems?</p>	
<p>Are holding ponds relaxing wetlands? What is the cost and size of a constructed holding pond that would provide ecological benefits matching 1 hectare of wetland? And what is the list of ecological functions served by these ponds if being used as replacements for wetlands?</p> <p>It seems like we are decades behind in NL sometimes. Other parts of Canada have realized the inherent value of wetlands in planning and civil engineering. Seems like we are 20 years late to the party and are making some bad decisions already realized elsewhere. Has the city looked at best practices from elsewhere?</p>	<p>Thank you for your submission. Your questions were forwarded to the Manager of Development - Engineering for review and comment.</p>