

Name: Bonita Ford, M.A., B.Sc. (Participant #38)

SECOND ADDENDUM TO PARTICIPANT STATEMENT

This file supplements the Participant Statement by Bonita Ford on December 4, 2023 and the Addendum on January 22, 2024.

An explanation of my reasons in support of my position

2. Fiscally unsustainable to build on flood plain AND 3. Wetlands and threatened species protection, especially during a climate crisis

The Witness Statement from Tyler Bauman (water resources engineer) states: The costs associated with riverine flooding, which is the form of flooding depicted through floodplain mapping, is significant and increasing. Ontario is the second-highest flood-prone region in Canada, with an average annual loss of \$805.1 million. It is estimated that in Canada alone, annual flood costs could exceed US\$14 billion by 2050.” **I believe this is a significant point and I urge the OLT to not allow this to become an oversight.** I am concerned that few (or perhaps no?) other witnesses have raised this point.

Based on my review, the statements of Tyler Bauman, Robert West (ecologist), Eric Lalande (senior planner, re: floodplain), Jean-Francois Sabourin (engineer, director of water resources), Anthony Francis (ecologists), Jocelyn Chandler (planner, re: land and water), and Andrius Paznekas (geoscientist) do **not** directly address: the local risks presented by climate change; the importance of wetland protection to buffer increasing climate-related risks (floods, droughts, and wildfires); the potential of increasingly frequent storms or increasing flood risk due to climate change; or the importance of revising floodplain mapping based on increasing climate-related risks.

A study in August 2021 found that “the proportion of the world’s population exposed to floods grew by 20 to 24 percent ... [which was] greater than what previous models predicted. ... The increase in exposure includes ... the reclassification of some lands in the wake of large flood events and sea level rise.”²⁹ Furthermore, “A Western University professor has developed Canada-wide maps showing how floodplains ... may become inundated in the next 80 years under various climate change scenarios.”³⁰

While witness Jean-Francois Sabourin’s statement says, “The update in floodplain mapping results in a 2.8% reduction in floodplain area on the subject lands,” does JFSA’s Proposed Floodplain Mapping Amendment—and will RVCA’s upcoming review of this amendment—consider current climate data and the potential for flood zones to increase as a result of this?

Witness Robert West states “the EIS [Environmental Impact Study prepared on behalf of Caivan] does not map any of the confirmed SWH [Significant Wildlife Habitats] onsite” and West goes further to provide the maps. I wish to underscore West’s point: “How can an expert discern what the potential negative impacts will be on the overall form and function of a NHF [Natural Heritage Feature], when

they have not mapped the areas and reviewed them in the context of the proposed development? The EIS should identify the NHF on a map and estimate what the loss to that NHF would be.” Given the inadequate mapping in Caivan’s proposal, I am not confident of Caivan’s capacity to carry out this development in a manner that would fully protect the NHF’s in question. Again, I highlight the important relationship between healthy wetlands (and resident species) and the climate protection (and fiscal protection) they afford communities.

Furthermore, witness Eric Lalande states, and I fully agree, that: “While it is generally understood that the application would necessitate the realignment of the floodplain through earthworks [cut and fill] ... Modification to natural hazards is not taken lightly, and ... should be approached from a perspective of minimizing influence on natural processes, and not by maximizing development potential ... particularly where lands outside of a hazard are available.”

My original Participant’s Statement and my first Addendum describe in greater detail the financial costs of development in floodplains and the importance of protecting wetlands given the climate crisis. I urge the OLT and the parties to please consider the longer-term financial, ecological, and social implications of this proposed development.

Sources:

29. <https://earthobservatory.nasa.gov/images/148866/research-shows-more-people-living-in-floodplains>

30.

<https://www.watercanada.net/new-canada-wide-maps-show-how-floodplains-may-become-inundated/>