

November 24, 2022
Clark, Hon. Steve, MPP
Minister of Municipal Affairs and Housing

Ministry of Municipal Affairs and Housing
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Toronto, ON,
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Public Input Coordinator
MNRF - PD - Resources Planning and Development Policy Branch
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Dear Sirs,

As passionate Ecosystem Restoration graduate students and future Ecological Restoration Practitioners, we understand the importance of a healthy functioning watershed and the conservation of our natural spaces. A healthy functioning ecosystem provides us with many critical eco-services including:

- Water & Air Filtration and Quality
- Source Water Protection
- Storm Water Management
- Flood Mitigation
- Carbon Sequestration
- Wildlife Habitat

These examples represent a mere fraction of the benefits of having designated green space and adequate management of our assets.

Although we understand the need for accessible and affordable housing, we oppose Bill 23, More Homes Built Faster Act, 2022. We believe that alternative sustainable growth is possible and key to thriving communities. Specifically, we are concerned about the proposed changes to the following:

- Conservation Authorities Act
- Municipal Act
- Greenbelt Plan
 - Greenbelt Area Boundary Regulation (O. Reg 59/05)
 - Proposed Oak Ridges Moraine Conservation Plan (O. Reg 140/02)
- Ontario Wetland Evaluation System

Conservation Authorities function to protect people and property from natural hazards, to safeguard the integrity of our watersheds, to conserve and protect the biodiversity of our green spaces that in turn sustain us, and ultimately, to save lives. They are well- positioned to work closely with private landowners and other land stewards to address the human and environmental needs of our communities. They provide the multi-disciplinary expertise and regional perspective necessary to make informed, sound decisions.

We echo Conservation Ontario's Submission to the Standing Committee on Heritage, Infrastructure and Cultural Policy (Nov 9, 2022) and highlight their concerns that some changes proposed in Bill 23 will:

- Place new responsibilities on municipalities for natural hazards and natural resources that may lead to inefficiencies, uncertainties, and delays in the development review process;
- Weaken the ability of Conservation Authorities to protect people and property from natural hazards; and
- Reduce critical, natural, infrastructure like wetlands and greenspaces that reduce flooding and protect waters in our lakes and rivers.

Conservation Ontario's Key Recommendations and Suggested Legislative Amendments in their submission are therefore worth great consideration.

Several municipalities have assessed the needs of their community and opted to develop in a more sustainable, inclusive way. This involves utilizing lands that are already in urban centers, close to services that we rely on for happy and productive lives. We are at a time in modern history where we can right the mistakes of the past and invest in sustainable growth. We recognize the severity of the housing crises and the need to supply more homes and believe this is an excellent opportunity to prioritize development of brownfield and abandoned lands. Hasty decisions that threaten our watersheds will result in a burden on us all, increasing hazard risk and cost to the taxpayers of tomorrow.

Many of our existing natural spaces are already degraded and fragmented in Southern Ontario. Through our environmental program at Niagara College, we have seen the consequences firsthand of high impact development on the limited green space we still have. We also understand how ecological restoration efforts are critical to repairing the beneficial and life sustaining ecosystem services. We stand by the protection of the Greenbelt, greenspaces, and understand the urgency of minimizing further fragmentation.

Finally, we are concerned about changes to the Ontario Wetland Evaluation System. In developing at the expense of an existing wetland, and offsetting by creating others elsewhere, it can take decades for a new or expanded wetland to attain higher levels of species richness and abundance.

In light of this, we respectfully ask that you pause the passage of Bill 23, consider the risks and loss of eco-services, and examine who will truly benefit in the long run.

Give us a place to stand and a place to grow and we will call this land Ontario.

Sincerely,

Ecosystem Restoration Students

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