



Georgian Bay Forever is a registered Canadian Charity working to protect and enhance Georgian Bay through science, research, education and action. We have partnered with the Government of Ontario to help it achieve its desired outcomes of protecting our water and natural resources in Georgian Bay through a number of programs over the years representing significant investments of our own resources.

We see definite threats arising from the proposed Bill 23, the Build More Homes Faster Act and are not supportive of the legislation in its current form or the related enabling changes proposed to OWES for a number of reasons including the following:

- We have had very little time to provide consideration to these proposed changes and due to the timing by the Government of Ontario have no ability to consult meaningfully with municipal governments. Intentionally introducing this Bill in the post-municipal-election-period with a very short response timeline does not give new councils appropriate time to respond – especially in light of the Government’s changes to the OWES placing the responsibility solely on municipal governments that are barely sworn in. This is a significant impediment to meaningful public comment that could in fact be very beneficial to the Government in its deliberations on behalf of Ontarians.
- There are important and detrimental impacts of this proposed Bill on the work we have collaborated on over the decades collectively undertaken to protect the numerous species at risk that under this proposed bill would not recover or be protected. One of the most biodiverse land types are wetlands and Georgian Bay is home to globally unique and highly undegraded coastal wetland habitats important to a number of economic sectors. These sectors should be entitled to equal consideration with benefits this bill provides to the housing and development sector, especially if done correctly they need not be at odds but could be achieved more sustainably and with greater overall value protected for the Province of Ontario and taxpayers.
- Proposed changes to the OWES system in tandem with and to enable this proposed legislation will drastically redefine the protections available to these extremely sensitive environments utilized by our threatened species.
- Protecting these spaces and the green belt lands are important not especially when they are undevelopable – in their natural state they simply exist and provide the ecological services – but especially when they become targets for development and short-term economic gain. At these times, having the protections envisioned for them by previous scientific evidence-based approaches is especially critical -- because wiping them out to facilitate development is an irreversible harm inflicted on current and future generations. These natural resources are not currently being valued by the province and therefore, under this proposed change the losses arising from adverse impacts on or destruction of these Municipal Natural Assets is not being properly considered in the overall balance sheet of Ontario.
- Further, this Bill is supported through changes the Government is proposing to the Ontario Wetlands Evaluation System (OWES) that, in joint review, seem contradictory. The OWES modifications make municipalities the sole consumers of the OWES reports, by eliminating other consumers of the OWES document. The changes the Government is proposing to the Planning Act will impact site plan approvals by allowing Ministerial Zoning Orders to overturn municipal decisions on requirements for plans of subdivision, industrial parks, businesses and site plan approvals through amending sec. 23 of the Planning Act. This will expose wetlands and



important habitat to massive development exploitation at a time when protecting ecosystems and wetlands for future generations has become an increasingly shared value of the public, ecosystems stakeholders and Rights Holders.

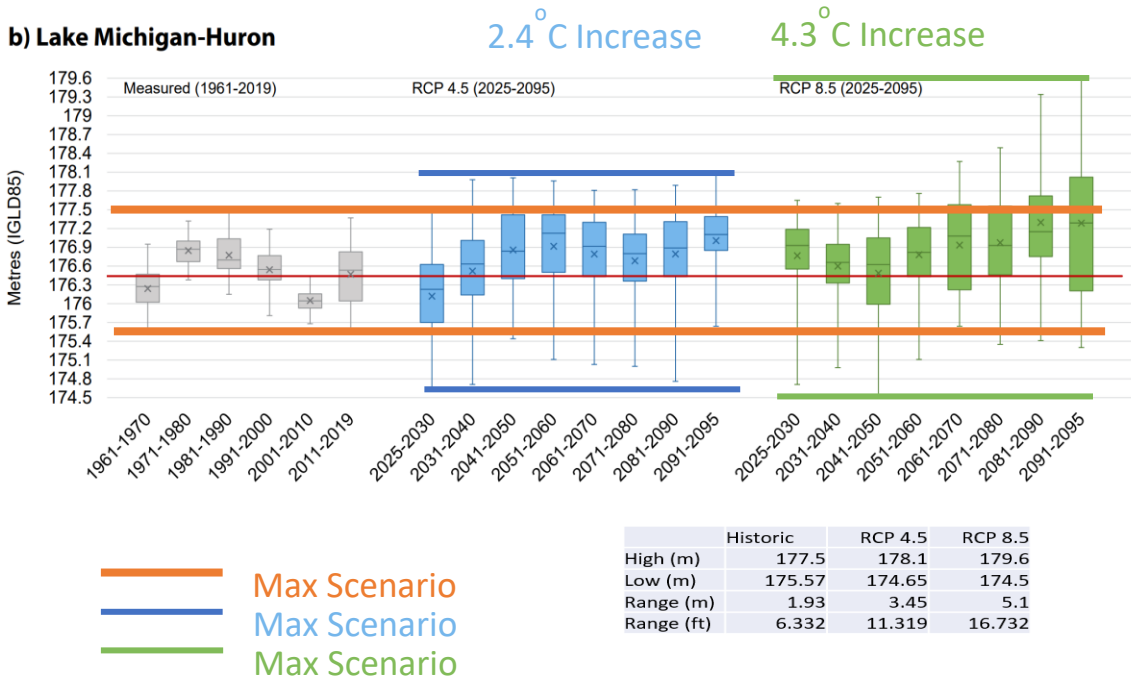
- Rights Holders treaty expectations and traditional values will be destroyed – the process and proposed legislation violate Treaty and Indigenous Rights as consultation and reconciliation efforts are not addressed in this Bill and there are no Indigenous voices at the table.
- Even government’s own agencies’ historic investments will be squandered. Hundreds of millions of dollars will be wasted by the changes undoing the remedial and restorative work that Ontario taxpayers have invested in protecting these important habitats. The current government has made investments to protect many of the very places now being exposed to the threat of destruction by insufficiently regulated development.
- As such, numerous Provincial and municipal efforts to create ecological, wholistic watershed planning will be eradicated. Political boundary decision-making will eradicate the integrated ecological integrity planning of lower tiers of government. As written, the proposed Bill will seriously compromise the ability to protect wetlands, forests, farmlands and fragile ecosystems. Decision-making will be fragmented and already sparse resources will be completely inadequate to shoulder the responsibilities solely being placed on every little community. This Bill creates severe impediments to climate mitigation and adaptation strategies. Further, the meagre resources available to a municipality would be completely squandered through the imposition of a Ministerial Zoning Order overriding the scientifically informed work completed at the local level through a political decision-making process.
- Again, in a contradictory manner, Climate Change fighting Green Building Standards are gutted by the provisions of this Bill that particularly attack municipalities’ ability to require green building standards some of which are already in place through significant monetary investments made in many communities across the province. This direct economic loss to the forward-thinking municipalities that have implemented such standards will also be a disincentive to other municipalities across the Province that were only just on the verge of developing green building initiatives and prevent or seriously impact their ability to put the necessary standards in place. This means that it will be more difficult to build energy-efficient, climate resilient buildings which are both more affordable for residents and essential if we are to meet the legislated commitments to reduce GHG emissions as adopted by many municipalities. The resulting increase in climate change impacts will have direct measurable ecological impacts on the sensitive habitats the Province has made significant investments to protect over the years through a variety of programs.
- The outcomes of this legislative proposal will adversely impact other economic sectors such as Marinas, boating, cottagers, contractors, the recreational and commercial fisheries and hunters, tourism and forestry all to benefit a single economic sector for the short term benefit of a few developers – developers that will still benefit from a more thoughtful regulatory regime that only allows development on lands that are actually amenable to development.
- Further, our aquatic ecosystems are under stress already from significant increases in water temperature and precipitation regimes. Climate change mitigation is the most cost-effective goal. We can see the increasing costs to consumers and businesses of insurance cost increases due to escalating “natural” disasters. The impacts of this proposed Bill are not being properly costed into the analysis. Under the proposed legislation, Climate Action will be restricted. We



know buildings and transportation are the two highest sources of greenhouse gas (GHG) emissions. Implementing upfront building standards (low carbon materials, air-source heat pumps) is far cheaper than the cost of retrofits down the line and saves home-owners considerable energy costs. Bill 23 will severely restrict and even eliminate the ability of a municipality to require this upfront energy efficiency in the design of new housing. In turn this impacts the health of our aquatic ecosystems and the quality of our drinking water. A single storm over 24 hrs in Collingwood in September of 2021 resulted in 14 hours of raw sewage discharge into Georgian Bay and a further 20 hours of partially treated sewage release. This directly impacts drinking water treatment, recreational uses of the water, esthetic impairments to the water bodies and destructive impacts on our freshwater ecosystems.

- Georgian Bay Coastal wetlands are comprised of numerous small wetlands aggregated into Wetland Complexes. That is the intrinsic nature of the Canadian Shield on the eastern coast of Georgian Bay. Under the government's proposed changes, wetlands will be redefined. Further the proposed changes to OWES will allow individual units within the wetland complex to be evaluated individually and their value in isolation from the complex assessed. As each of these individual components is designated as non-significant, the value of the entire wetland complex is degraded. So death by a thousand pinpricks will occur resulting in a loss of critical habitat for fish species, birds, amphibians, reptiles and mammals is a reasonably foreseeable result of these changes and therefore is premeditated to destroy coastal natural assets and further impact already endangered species.
- Further changing the OWES to exclude the recognition that planting of crops or tillage tends to destroy wetland values is not for the purpose of the removal of redundant text but rather to accomplish without scientific input a complete reworking of the intention to protect the wetlands on farms. "In contrast, planting of crops or tillage tends to destroy wetland values and thus should no longer be considered as wetland." Is completely different in meaning and outcome to the proposed wording "In contrast, planting of crops or tillage should no longer be considered as wetland."
- The proposed criteria for the designation and boundaries of critical wetlands will result in the removal of some of our most essential natural heritage. The new criteria will make it impossible to protect wetlands and natural assets from ill-advised development. This weakens the ability to protect natural carbon sink assets, thereby limiting the ability to respond to climate change, maintain essential biodiversity in our sensitive habitats that are local ecosystems and globally significant migratory species, and to prevent flooding in extreme weather events that threaten private and municipal infrastructure.

- Significant adverse economic impacts have already been experienced under historical water levels regimes in Georgian Bay. The government has not considered those impacts in light of the recently released water levels monitoring from Environment and Climate Change Canada that models a water levels range increase from 1.93m (6.33 feet) between extreme high and low



water historically to a range of 3.45m (11.3 feet) under an RCP 4.5 scenario – an increasingly likely climate change destination.

- Conservation Authorities are being stripped of power and this is a major threat to the habitat of endangered species and to municipal and private infrastructure. Conservation Authorities (CA) will no longer rule on the environmental impact of a proposed development on protected farmland (our food security), habitat, and waterbodies. The CA will not be able to prevent construction debris from impacting water supplies. This Bill opens the door to more contamination of land and water, more flooding and landslides. While we do not have a Conservation Authority in Muskoka or Parry Sound Districts, there is work being done to implement an Integrated Watershed Management Plan to make land use planning decisions to protect both the economy and ecological integrity of the region, an imperative if we are to respond to the urgency of the climate crisis. This Bill will jeopardize not only our region's opportunities to make climate responsible decisions across all jurisdictions but it will also harm climate resiliency across all of Ontario.
- Bill 23 overrides our Charitable purpose by removing the requirements regarding public notification and public meetings on planning matters and removes the right for citizens to appeal planning decisions. These provisions infringe on our democratic rights and principles and must not be supported.

As mentioned earlier, the time allotted for our organization to provide an in depth analysis that could be very useful to the Government in its deliberations is completely inadequate, but we have done our best to provide numerous starting points for discussion in this opposition letter.



We look forward to future opportunities to bring a balanced scientific approach to this critically important decision process to ensure the maximum value is achieved for Ontario and that our ecosystems get to maintain and improve the protections we all know they need and deserve. The Provincial Policy Statement should be respected.

Respectfully,

David Sweetnam, Executive Director