



23 December 2022

The Honorable Steve Clark
Minister of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, Ontario
M7A 2J3

Regarding:
ERO 019-6177 Review of A Place to Grow and Provincial Policy Statement

Dear Minister Clark,

Birds Canada is a non-profit charity that aims to drive action to better understand, appreciate, and conserve birds in Canada. We are writing to express our concern regarding ERO 019-6177 of Bill 23 or the More Homes Built Faster Act, 2022. We believe the proposed changes will harm native Ontario wildlife species and their habitats and will undermine the province's commitments and accomplishments for biodiversity conservation and climate change mitigation and adaptation. We urge the Government of Ontario to provide cities, towns, and rural communities with a mix of ownership and rental housing types that meet the needs of all Ontarians *without* implementing the changes discussed in ERO 019-6177. *We oppose the changes discussed under ERO 019-6177 for the reasons summarized below.*

Natural heritage offsetting

ERO 019-6177 introduces natural heritage offsetting as a tool for reducing development pressure on wetlands, woodlands, and other natural areas. We think this is a serious mistake because these valuable natural areas are typically complex and diverse, established over long periods of time, and cannot be replaced by simple substitution with anthropogenic wildlife habitat creation projects. A majority of woodlands, wetlands, and other natural areas in southern Ontario have been lost, fragmented, and harmed over the decades through development, urban sprawl, and other pressures. Rather than enabling further loss, we urge the Government of Ontario to preserve and protect remaining natural features in southern Ontario, notably wetlands and woodlands. Offsetting should not be enabled as a tool to facilitate development because this creates an inevitable loss for biodiversity, natural areas, natural heritage systems, and for ecosystem services. Created or restored wetlands rarely replace the full wetland structure and function they were meant to offset (Moreno-Mateos et al., 2012. Structural and functional loss in restored wetland ecosystems. PLoS Biology 10, e1001247). Restored wetlands also rarely replace the entire wetland bird community they were meant to offset (e.g., Anderson et al., 2019. Differences exist in bird communities using restored and natural wetlands in the Parkland region, Alberta, Canada. Restoration Ecology 27, 1495–1507). The same is true for woodlands and other natural areas. We urge the Government of Ontario to protect existing natural areas and features, such as those identified in natural heritage systems by Conservation Authorities, Upper Tier Municipalities, and community and conservation groups. Further, the government should focus on restoring and enhancing natural heritage features above and beyond the current extent of these features in southern Ontario.

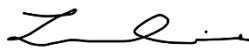
The Government of Ontario should not offset our valuable natural heritage features to make way for development as is the case in ERO 019-6177.

Conclusion

Birds Canada is concerned that ERO 019-6177 moves Ontario backwards and not forwards with respect to housing, biodiversity conservation, climate change mitigation and adaptation, and the land-use planning process in general. We urge the Ontario Government to abstain from natural heritage offsetting, as discussed under ERO 019-6177, and instead, increase, not reduce or offset, the current extent and function of existing natural features.

Thank you for the opportunity to provide feedback on ERO 019-6177.

Sincerely,



Laura Irvine
Director, Ontario Programs



Douglas C. Tozer, PhD
Director, Waterbirds and Wetlands

c.c. Gregor Beck, Senior Strategist