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Region of Waterloo

Sandy Shantz, Mayor  
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Berry Vrbanovic, Mayor  
City of Kitchener

November 22, 2022

Dear Government of Ontario,

The **rare Charitable Research Reserve** is a land trust that operates in the Region of Waterloo and Wellington County. In our roles as stewards of conservation land and advocates for wise and responsible land use in Ontario, **rare** must object to many aspects of the proposed Bill 23, also known as the “More Homes Built Faster Act.”

#### Ambassadors

David Agro

Ljubodrag Andric

Michael Barnstijn

Kehkashan Basu

David Buckland

Ed Burtynsky

Geneviève Caron

Severn Cullis-Suzuki

Ron Dembo

Louise MacCallum

Gerry Remers

R. Murray Schafer

Jane Urquhart

Frances Westley, OC

Morden Yolles

Southern Ontario is one of the most densely populated areas of North America, home to millions of people now, and tens of thousands more expected over the next few years. It is undeniable that people will require housing, although responsibly planning for this growth is a key role of the provincial government. The environment is not simply a place for human recreation, as it is often treated in municipal and provincial planning approaches. Rather, a healthy environment forms the basis of the very ecological services that support human society. These ecological services are free, but for the land they require, and often cannot be replicated by technology and built infrastructure. We encourage the province to find and acknowledge expertise in this area in the planning process.

In particular, Schedule 2, which amends the Conservation Authorities Act, and Schedule 9, amending the Planning Act, have the greatest potential for environmental damage. Conservation authorities are charged with several important aspects of the planning process, which are not duplicated elsewhere in municipal or provincial regulations. Furthermore, they operate in ecologically relevant landscape units i.e. the drainage basin, which allows for more meaningful management of flood capacity, wetlands, and so forth. These activities prevent damage to people and property that would otherwise cost insurance or the public purse. Protection of habitat and biodiversity is another key role, and capacity in this area should be increased as the province works to adapt to and mitigate climate concerns.

The eminent economist Herman Daly, who died last month, was one of the first to note that the basis of a healthy economy is a healthy environment. Bill 23 proposes many measures that contravene sound economic management, which will privatize

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benefits to corporations and privileged individuals, but socialize costs in many ways. This well-known principle is the Tragedy of the Commons, and in the 21<sup>st</sup> century greater wisdom is required. While benefits accrue to real estate developers, the removal of wetlands and floodplains will destabilize management of water on the landscape and reduce water quality, requiring tax dollars to be spent on rebuilding and repairing homes and infrastructure, and provision of clean water. Loss of agricultural land will put Ontario at the mercy of uncertain foreign food supplies, which are becoming less reliable with climate change and increasing population elsewhere. Loss of habitat, for example in the Greenbelt, will lower air quality and damage health, further increasing the burden on taxpayers.

We encourage the government to seek a more sensible and sustainable approach to long-term planning, including identifying population growth and supporting ecological services that can be accommodated by the land. To do otherwise is to choose a future of shortage and want for Ontarians.

Sincerely,  
Dr. Stephanie Sobek-Swant  
Executive Director

Dr. Tom Woodcock  
Planning Ecologist