



24 November 2022

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

Regarding:
019-6174 Proposed Revocation of the Central Pickering Development Plan

Dear Minister Clark,

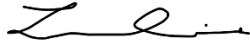
Birds Canada is a non-profit charity that aims to drive action to better understand, appreciate, and conserve birds in Canada. We are writing to express our concern regarding ERO 019-6174 under Bill 23 or the More Homes Built Faster Act, 2022. We believe the proposed changes will harm native Ontario 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 proposed in ERO 019-6174. *We oppose ERO 019-6174 for the reasons summarized below.*

ERO 019-6174 removes or reduces the power and involvement of an upper tier municipality (UTM) to approve or provide input on development decisions. We think this is a mistake because UTMs have unique regional knowledge of watershed and natural heritage systems that is critical for effective conservation measures, environmental protections, and public safety. Birds Canada has firsthand knowledge of this valuable expertise because we work closely with UTMs across the province in a variety of ways to help ensure sound conservation of wild birds and other wildlife and the important natural habitats that sustain them. We are concerned that biodiversity conservation and the integrity of natural heritage systems (e.g., wetlands, watersheds) will suffer without the full involvement of UTMs in development decisions. We urge the Government of Ontario to maximize the power and involvement of UTMs to approve or provide input on development decisions. This will ensure the best decisions are made for biodiversity conservation in the short and long-term. The identification and protection of natural heritage systems and sensitive areas, e.g., floodplains, are cornerstones of sound land-use planning and the role of UTMs is essential for conservation and public safety, as well as identifying areas best suited to development and housing. The Government of Ontario should not take UTMs out of the development decision process as proposed in ERO 019-6174.

Birds Canada is concerned that ERO 019-6174 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 increase, not decrease, the role and involvement of UTMs to approve or provide input to development decisions. As such, we do not support the revocation of the Central Pickering Development Plan.

Thank you for the opportunity to provide feedback on ERO 019-6174.

Sincerely,



Laura Irvine
Director, Ontario Programs



Douglas C. Tozer, PhD
Director, Waterbirds and Wetlands

c.c. Gregor Beck, Senior Strategist