



23 December 2022

The Honorable Graydon Smith  
Ministry of Natural Resources and Forestry  
Room 6630, 5<sup>th</sup> Floor, 99 Wellesley Street  
Toronto, Ontario  
M7A 1W3

Regarding:

**ERO 019-2927 Proposed updates to the regulation of development for the protection of people and property from natural hazards in Ontario**

Dear Minister Smith,

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 019-2927 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 in ERO 019-2927. *We strongly oppose all of the changes under ERO 019-2927 for the reasons summarized below.*

#### **Conservation Authority (CA) approval and input**


ERO 019-2927 removes or reduces the power and involvement of CAs to approve or provide input on development decisions. We think this is a mistake because CAs 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 CAs 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 (e.g., Cartwright et al., 2021. Assessing terrestrial wildlife populations in the Toronto and Region Area of Concern. *Journal of Great Lakes Research* 47, 273–282). We are concerned that biodiversity conservation and the integrity of natural heritage systems (e.g., wetlands, watersheds) will suffer without the full involvement of CAs in development decisions. We urge the Government of Ontario to maximize the power and involvement of CAs to approve or provide input on development decisions, and we urge the Government of Ontario provide financial support for them to do so. 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 CAs 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 CAs out of, or reduce CA's involvement in, the development decision process as is the case in ERO 019-2927.*

## Conclusion

Birds Canada is concerned that ERO 019-2927 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 repeal ERO 019-2927 to increase, not decrease, the role and involvement of CAs to approve or provide input to development decisions and provide increased funding for them to do so.

Thank you for the opportunity to provide feedback on ERO 019-2927.

Sincerely,



Laura Irvine  
Director, Ontario Programs



Douglas C. Tozer, PhD  
Director, Waterbirds and Wetlands

c.c. Gregor Beck, Senior Strategist