

November 15, 2022

Dear Premier Ford and Hon. Minister Steve Clark,

This Earth that we inhabit is meant to provide a home where all of creation can be healthy and can thrive. But these days the stresses of climate change, conflict and disease threaten so much of what is good. This is why the recently introduced Bill 23, "More Homes Built Faster Act", and its hasty passage through the Legislature without proper consultation and democratic process, has me worried. If allowed to pass in its current form it will have a huge negative impact on the environment, thus speeding up climate change, rather than mitigating it. So I am writing to you today, as a person who believes we must be stewards of the earth and as a member of Faith Climate Justice Waterloo Region (1), to express some of my concerns.

While I fully agree that more affordable housing is absolutely necessary, and that it should be created in the most expeditious way possible, I do not agree that it should be done at the expense of sensitive green spaces, wetlands, the Greenbelt, source water, or any of the protections that have been put in place to preserve habitats and prevent rural sprawl. It should also not be done by taking power away from Conservation Authorities and regional governments. Yet this is what Bill 23 will do if passed as-is.

Yes, we need more housing. Here in the Region of Waterloo the local governments have all accepted the Regional Official Plan (ROP) which allows for maintaining the Countryside Line; there is enough space within the urban areas to build new homes. The ROP takes into account the climate crisis we are facing by increasing density, building near transit (hence cutting down on the need to drive longer distances), and promoting 15-minute, livable communities. It also recognizes that homes can be more affordable since building single family homes further out in the suburbs will inevitably make them more expensive.

While there are many reasons, as I've already suggested, why Bill 23 should not become law, its impact on wetlands will be particularly severe.

Wetlands are a nature-based climate solution. They store and sequester carbon, they can provide flood control and mitigation (a much-needed benefit as flooding becomes more and more frequent), and they provide wildlife corridors (thus aiding in the protection of biodiversity and threatened species). Importantly, wetlands can better provide all these benefits if they are left undisturbed. Development on, or near, wetlands, will continue the already rapid disappearance of these very critical environmental features. Trying to offset their destruction by creating new ones is grossly inadequate as it is difficult or impossible to recreate most wetlands. In suggesting that this can be done the Government of Ontario is going against its own Ministry of Natural Resources and Forestry which, in 2017, released *A Wetland Conservation Strategy for Ontario 2017 – 2030*. (2&3) Further, Dr. Dianne Saxe, former Environmental Commissioner of Ontario, says of this bill, ""It just demolishes a wide swath of

environmental protections that we desperately need. It's a frontal attack on conservation authorities, conservation lands and wetlands which are critical for protecting us from flooding."
(4)

Unless the major flaws in Bill 23 are addressed, it will further the destruction of critical natural areas, such as wetlands, in a time of climate crisis, while also failing to deliver the urban transformation – or the affordable housing – that Ontario needs. This bill must be withdrawn or be given a lengthy period of public engagement.

Respectfully,

References:

1. Faith Climate Justice WR is a grassroots collective of faith communities and citizens across Waterloo Region who are gravely concerned about the global climate emergency and its impacts on people, the natural world, and our communities (see www.faithclimatejustice.ca).
2. [Why is it crucial to protect Ontario's wetlands? - Environmental Defence](#)
3. [Ontario's Housing Bill is Actually a Trojan Horse for Environmentally Catastrophic Rural Sprawl - Environmental Defence](#)
4. [Ford's housing bill limits protection of watersheds, greenspaces, conservation authorities warn | CBC News](#)

To express your concerns about this bill, please write as soon as possible to the following and copy your own MPP:

Premier Doug Ford, Legislative Building, Queen's Park, Toronto ON M7A 1A1; 416-325-1941; premier@ontario.ca

Hon. Minister Steve Clark, Ministry of Municipal Affairs and Housing, 17th Floor, 777 Bay St., Toronto, ON M7A 2J3; 416-585-7000; minister.mah@ontario.ca