

Comments Submitted to Ontario Environmental Registry on Components of Bill 23

[Proposed Updates to the Ontario Wetland Evaluation System](#)

ERO number

019-6160

Comment ID

72097

Commenting on behalf of

Niagara Falls Nature Club

The Ontario Wetland Evaluation System (OWES) should be kept and strengthened as it is science-based and gives a standardized approach to assessing wetlands. Most Wetlands in the Niagara area are complexes and most would no longer be classified as significant wetlands at all after the proposed changes to the system. Destroying the smaller wetlands in a complex would lead to others being degraded.

Wetlands should be evaluated with consideration of their function in providing critical habitat for species at risk and for wildlife and migration habitat for all species.

Wetlands are natural assets which provide many benefits to the people in a watershed such as flood mitigation and water purification, carbon sequestering, ground water recharge and erosion control. There is enough land in Ontario on which to build homes without paving over wetlands.

A central agency, preferably the MNRF, is needed to oversee and coordinate wetland evaluation and information. Municipalities do not always have staff trained to do this and there does not seem to be a comprehensive method in the new guidelines for the information to be stored and accessed. We all know that wetland evaluations conducted by consultants who are paid by developers lack completeness.

We in Niagara have already lost over 85 percent of our wetlands. We need to treasure and preserve those we have left. We ask that you withdraw this proposal.

Submitted November 23, 2022 8:33 PM

Comment on

[Proposed Planning Act and City of Toronto Act Changes \(Schedules 9 and 1 of Bill 23 - the proposed More Homes Built Faster Act, 2022\)](#)

ERO number

019-6163

Comment ID

78602

Commenting on behalf of

Niagara Falls Nature Club

Yes, Ontario needs more housing. We especially need housing for those with low or mid-level incomes. Huge homes in spreading subdivisions carved out of greenbelt lands, filled-in wetlands and conservation authority lands are only options for the wealthy. The wealthy are not housing insecure.

Inclusionary zoning should be extended. Five or six story apartment complexes with retail on the first floor could be the basis of walkable, pleasant communities. If these were built, with decent size units, with green space in the vicinity, retirees might wish to move from homes that are getting too large for them to want to manage.

Renters need more protections, not less. Replacement by-laws should not be weakened. Municipalities should not lose their ability to regulate tenant protections and to build affordable housing. It does make sense to exempt non-profits and those building affordable homes from development charges. If developers building high price and market price homes are exempt from paying development charges, municipalities will find it even more difficult to provide and sustain infrastructure.

Bill 23 will benefit only wealthy developers and investors. Ontario residents needing affordable housing will find their options even more limited.

The strong mayor concept, giving one official the power to make vital decisions affecting the lives of citizens while taking away their right to comment, is antithetical to the ideal of a thriving democracy

Comment on

[Proposed Amendments to the Greenbelt Plan](#)

ERO number

019-6216

Comment ID

79196

Commenting on behalf of

Niagara Falls Nature Club

The Greenbelt was created to protect significant natural lands and farmlands from death by a thousand cuts which would result if developers and land speculators were allowed to build in these areas.

It is not true that this land is needed to build homes on. There is already sufficient land to build homes on for decades in Southern Ontario. The urban boundaries have already been expanded to provide even more of this land. Swapping land is not a solution.

Some of the land to be swapped is also land that should be or already is protected in other ways and doing this swap would lead to more demands from developers to build on protected lands.

It is not true that these lands would help to make housing more affordable. Building on greenbelt lands will result in sprawl away from where those needing affordable homes live and work.

The homes that would be built in these subdivisions would be large suburban homes for the wealthy. Building these homes would prevent more affordable homes from being

built because the province is short on skilled workers in the building trades. Homes should instead be built in already urbanized areas that are zoned for residential building. Higher density, infilling and inclusive zoning should be encouraged. Farmland needs to be vigorously protected if we are to feed ourselves in the future and this proposal would destroy farmland including some lands designated as tender fruit areas.

Natural areas, wetlands, woodlots and streams would all be impacted. We would suffer biodiversity loss when the linkages that allow wildlife to move across the landscape are destroyed. We would lose threatened species that depend on these natural areas. If you allow land to be removed from the greenbelt, we will have less climate change resilience and experience more flooding.

Please withdraw these amendments to the greenbelt.

Submitted December 4, 2021

Comment on

[Proposed Planning Act and Development Charges Act, 1997 Changes: Providing Greater Cost Certainty for Municipal Development-related Charges](#)

ERO number

019-6172

Comment ID

81094

Commenting on behalf of

Niagara Falls Nature Club

Population growth and greater density makes it imperative that there be more parkland designated, not less. People need to connect with nature for their physical and mental health and well-being. Including private lands to count as parklands would further disenfranchise the less-wealthy. Municipalities should spend their parkland reserve balance when and how makes the most sense for them.

Municipalities need development funds to pay for needed infrastructure. With the cost of living rapidly rising, residents should not have to pay higher taxes or make do with fewer services so that developers and investors can pocket even more wealth.

It does make sense to waive development charges for non-profits building affordable housing units and also for affordable units in a development subject to inclusionary zoning.

Submitted December 9, 2022 7:00 PM

Comment on

[Conserving Ontario's Natural Heritage](#)

ERO number

019-6161

Comment ID

81749

Commenting on behalf of

Niagara Falls Nature Club

ERO 019-6161 - Conserving Ontario's Natural Heritage

Wetland offsetting has been proposed and attempted in many localities with very little success, much less the promised net gain.

Wetland offsetting should be used only rarely, where unavoidable, and with a strict mitigation strategy followed.

A compensation fund would make offsetting much more attractive to developers and would lead to greater destruction of wetlands. A compensation fund should be entirely ruled out.

Offsetting should never be permitted as a way to build more subdivisions. Suitable land is already available for residential building. There are many places in existing settlement areas where increased intensification would be desirable, would use existing infrastructure, and would be much more ecologically sound.

Wetlands are vital to our health, our well-being, and to the economy. Functional wetlands and wetland complexes are needed as habitat for wildlife. We have already lost too much of our biodiversity in Ontario. Please remove this offsetting policy from consideration.

Submitted December 30, 2022 11:50 AM

Comment on**[Review of A Place to Grow and Provincial Policy Statement](#)****ERO number**

019-6177

Comment ID

81751

Commenting on behalf of

Niagara Falls Nature Club

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

Ontario's Growth Plan was consulted on and developed over the course of years with a view to planning sustainable development and protecting farmlands and natural areas. Many governmental organizations, NGOs and individuals participated in the

consultations. This proposal would cut off participation in planning in Ontario by all but the provincial government.

Municipalities have worked for years on land planning to attempt to place new developments where they would have the least deleterious effect on farmland and natural areas and features. 019-6177 would permit sprawl that would cause the destruction of much of this land. Land planning needs to be done with local knowledge of the areas affected to avoid flooding, environmental damage, and the loss of biodiversity.

This proposal would put an end to the concept of complete communities. Please withdraw it.

Submitted December 30, 2022 12:10 PM