



Quinte Field Naturalists

The Quinte Field Naturalists Association is affiliated with Ontario Nature, a non-profit organization sponsoring nature education, conservation and research.

November 14th, 2022

Dear MPP Ric Bresee,

Quinte Field Naturalists (QFNs) are concerned about the many impacts that Bill 23 could have on the quality of life for both Humans and all species inhabiting our beautiful surroundings. We are concerned about the loss of Conservation Authority powers resulting from this bill as well as the many policy changes that will undermine the stability of our natural environment. The consequences of not respecting the balanced ecosystems currently in existence and the biodiversity that thrives within them are an increase in the effects of climate change and a rise in species loss. Natural disasters will grow in numbers, ravaging our lands and waters, concomitantly challenging the living conditions of all life.

As an organization involved in nature education, conservation and research, we have insights into the great value that ecosystem services offer Humans and other life. Our ecosystems provide food, water, air purification, soil formation and pollination. They regulate climate, water and disease. We must not be silenced by Bill 23: we need to have a voice in how our natural heritage is treated. It is important to note that we recognize the great need for affordable housing and are supportive of inclusive, environmentally friendly development.

Below, I shall address QFNs concerns in three separate categories: the loss of Conservation Authority powers; the policy changes that impact our natural surroundings and the services they provide for us; the undermining of the democratic process through the removal of the right for consultation and appeal.

Loss of Conservation Authority Powers

- Currently, Conservation Authorities are actively involved in prevention, conservation and restoration of our natural heritage. Working across our area in the different watersheds, Quinte Conservation, Lower Trent Conservation and Crowe Valley Conservation strive to mitigate climate change, conserve biodiversity, protect against floods and ensure healthy, wholesome recreation opportunities. Bill 23 would limit them to consider only flooding and hazards. They would be reacting to the natural disasters rather than engaging in watershed planning and management. This short-sighted approach would lead to large expenditures of financial, natural and Human resources to recover from flooding, tornadoes, violent storms and other disasters.
- Bill 23 will remove or weaken Conservation Authorities permitting functions. With permitting being turned over to the municipalities, and CAs only given the right to comment, the scientific, data-based expertise is diminished and the power is transferred to the municipalities where development interests wield the most influence.
- Along with the transfer of permitting powers to the municipalities, the erosion of regional planning in accordance with watershed boundaries will be very detrimental. It would result in piecemeal planning by over 400 individual municipalities. Instead of being able to benefit from the expertise of CAs, Municipalities would be left to try to coordinate with neighbouring

municipalities on cross-jurisdictional matters. Small municipalities do not have the capacity to take on all the work being done by conservation authorities. The option of hiring more staff would result in tax increases that would affect a population that is already struggling to cope with rising prices in food, fuel, rent and other basic requirements.

- As we struggle to protect and conserve more natural lands to support biodiversity and to mitigate climate change, it is not appropriate to ask CAs to identify lands that already are protected so that they can be used for housing development. What criteria will be used and who will make these decisions? Humans require more open space for a healthy lifestyle and our wild creatures need contiguous tracks of natural habitat for migration, food resources and shelter. The recommendations of the Province's housing Affordability Taskforce needs to be pursued, using the land and resources that already are available for development.
- The land around our watercourses and wetlands need to be protected to prevent contamination of the water and inhibition of the functions that the wetlands perform. Development too close to these areas will result in erosion and leaching, contamination and ultimately, degradation of life. Bill 23 should not reduce regulated areas around wetlands & watercourses, exempt certain activities from the need for a permit and allow developers to appeal failure to issue a permit within 90 days. All of these actions reduce the ability of Conservation Authorities to help us maintain a healthy, well-balanced natural environment.

Policy Changes that Impact Our Natural Surroundings

- Bill 23's proposal to overhaul Ontario's Wetland Evaluation System to disallow the 'complexing' of wetlands would be highly detrimental. This action would reduce, significantly, the number and extent of wetlands that would be deemed to be provincially significant, and thus off-limits to development. The proposal also eliminates the endangered species criterion, drastically diminishing the likelihood that a wetland will be found to be provincially significant and consequently protected from development. Wetlands are treasure boxes of valuable resources that we cannot afford to lose. They are storehouses of life, providing habitat for mammals, birds, reptiles, fish, amphibians, insects and many other inhabitants: they are libraries of information for naturalists & scientists; they are an attraction for tourism and provide a wonderful opportunity for people to relax in a peaceful setting. In addition, wetlands have many ecological functions. They serve as nurseries for fish, they control pests, they protect shores from erosion and they mitigate flood damage. The plants growing in this habitat cleanse the water and filter out pollutants, thus serving as a natural water purifier and helping to guarantee ample fresh, clean water in the area. The plants also store carbon dioxide as carbon in their tissues. By performing as vital carbon sinks, they help to mitigate climate change and global warming. All of these actions can have notable economic benefits for all of our local municipalities and others across the province.
- Closely linked to the issue of altering the Wetland Evaluation System is your proposal to introduce a policy of 'offsetting' wetlands, woodlands and other natural features. This means that developers would be allowed to destroy such features if they recreate a wetland or woodland elsewhere or pay a fee. These approaches have already been tried and failed elsewhere, so we need to learn from their mistakes rather than suffer the consequences of repeated failures. Scientific facts support the need to leave wetlands in their original locations because they typically occur where they do as a result of connections to the ground water system in that place. Woodlands are populated with trees of various ages including some trees that may be 100 years old. Newly planted trees will not replicate the roles that the trees in existing woodlands play. A small tree requires at least 40 years to store as much carbon as a mature tree. We need to respect and preserve our mature trees for as long as they are standing safely in our communities and throughout our woodlands.
- QFN has worked hard to educate municipalities in the area about the need to respect the natural world and take steps to protect against climate change. Bill 23 would undermine

municipalities who currently use or want to use Green Development standards to promote building emission reduction targets and other green infrastructure goals. As most communities in our area are experiencing a phase of development, developers and residents need to be encouraged and motivated to build in accordance with standards that support the environment. We are not exempt from the emissions reduction target of 40 percent below 2005 levels by 2030 and net-zero emissions by 2050. All levels of government and all citizens and industries need to work together to achieve this target. The results will greatly impact the quality of life of future generations of flora, fauna and the Human race.

Democracy Undermined

- Bill 23 would remove your government's requirement to notify members of the public and organizations such as Quinte Field Naturalists about development plans. It would also take away the right to appeal municipal planning decisions. We, who live in the area and have an intimate knowledge of our neighbourhoods, our local farmlands that provide a lot of nutritious food and our natural areas that offer habitat, recreation, research opportunities & ecological services, need to share the rich bank of information that we have acquired to arrive at collaborative decisions that will benefit all, both now and into the distant future.
- Bill 23 would remove the decision-making from the local level, placing the power in the hands of the Minister who is permitted to override municipal planning decisions and impose development. Decision-making involving the grassroots level will provide richer qualitative data as well as quantitative data, all of which must be considered to make decisions that will offer a healthy, food secure environment with rich, clean air and water for wildlife & Humans, and with a minimum of natural disasters.

Recommendations

- Remove Schedule 2 of Bill 23 and changes to the Conservation Authorities Act that limit the ability of Municipalities to enter review and commenting agreements with CAs & those that delegate CA regulations to Municipalities.
- Maintain the wetland evaluation system that currently allows 'complexing' of wetlands.
- Avoid large scale use of wetland & woodland 'offsetting': rather preserve these ecosystems and benefit from the rich supply of resources they offer. Use already designated properties for inclusive, affordable housing.
- Respect and use the 2007 science-based Endangered Species Act to support biodiversity.
- Maintain and promote Green Development standards.
- Continue to use a collaborative decision-making model in which the people that would be most affected by development will have a voice and in which the flora & fauna will be represented and valued for the critical roles they play in the maintenance of a well-balanced web of life.

Quinte Field Naturalists deeply value the biodiversity and quality of life currently existing in the Quinte area. We enjoy many rivers, wetlands, woodlands and other ecosystems in our area, all sharing a wealth of life and resources. We trust that you will consider QFNs recommendations seriously and make decisions that will provide both housing and the continuance of a rich quality of life that is greatly enhanced by the resources of our natural surroundings.

Sincerely,

Dr. Elizabeth Churcher

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Quinte Field Naturalists' Corresponding Secretary