

June 8, 2026

Good morning Mayor Meed Ward, Chair, Members of Committee, City staff, and the Burlington community.

On behalf of BurlingtonGreen, thank you for the opportunity to provide feedback on two items on today's agenda.

1. Analysis of Bill 98 – Building Homes and Improving Transportation Infrastructure Act, 2026

I would like to begin with the analysis of Bill 98, the Building Homes and Improving Transportation Infrastructure Act, 2026.

Although Bill 98 has now received Royal Assent, it remains worthy of discussion and continued advocacy by the City because of its significant and long-lasting implications for municipalities across Ontario, including Burlington.

As noted in staff report CAF-06-26, this legislation signals a major shift in how growth is planned and managed in Ontario. It affects municipal authority, development approvals, infrastructure planning, and numerous aspects of the Planning Act and related legislation. These changes will influence how communities are built for decades to come.

That is why BurlingtonGreen submitted comments to Council on April 17. While we recognize and appreciate the considerable work undertaken by City staff, including the preparation of thirteen Environmental Registry of Ontario submissions and the additional analysis provided in today's report, it was disappointing that BurlingtonGreen's submission was not included in Appendix O alongside feedback from other stakeholders.

More importantly, we remain concerned that both the report and the City's submissions to the Province do not fully identify the extent of the risks associated with this legislation, particularly its

implications for housing affordability, climate action, and Burlington's ability to achieve its greenhouse gas reduction targets.

The report's conclusion that there are no direct climate implications is especially concerning. Similarly, the unchecked strategic alignment category related to protecting and improving the natural environment and taking action on climate change does not accurately reflect the significance of the issue before us.

Respectfully, this represents a missed opportunity.

In fact, it appears inconsistent with concerns expressed elsewhere in staff's Environmental Registry submissions regarding the loss of municipal planning tools and local authority.

Legislation that weakens municipal planning authority, limits local tools for sustainable development, and reduces municipalities' ability to influence how communities grow inevitably has climate implications.

Bill 98 weakens or removes many of the tools municipalities rely on to ensure new development is energy efficient, climate resilient, and affordable over the long term.

The removal or restriction of green development standards does not eliminate costs. Rather, it shifts those costs into the future. Residents may face higher energy bills. Municipalities may face increased infrastructure costs. Taxpayers may ultimately bear the burden of costly retrofits and adaptation measures needed to address climate impacts that could have been mitigated through better planning today.

This is not simply a matter of streamlining approvals.

It is a transfer of long-term financial, environmental, and social costs from today's development decisions onto future residents and future councils.

The legislation also threatens Burlington's ability to implement many of its own Council-approved strategies and plans.

These include the Official Plan, the Integrated Mobility Plan, Sustainable Building and Development Guidelines, the Urban Forest Master Plan, the Asset Management Plan, and most importantly, Burlington's Climate Action Plan and Climate Resilient Burlington initiatives.

These plans are not aspirational documents. They are commitments that have been endorsed by Council following years of public engagement, technical analysis, and community investment.

Yet many of the tools needed to implement these plans depend on municipal authority over planning, development standards, infrastructure coordination, and growth management.

When those tools are weakened, the City's ability to achieve its own objectives is weakened as well.

The result could be higher greenhouse gas emissions, increased dependence on fossil fuels, reduced resilience to extreme weather, greater infrastructure vulnerabilities, and higher long-term costs for residents.

Equally concerning is the erosion of local decision-making authority.

Municipal governments are best positioned to understand local infrastructure capacity, environmental constraints, community priorities, and neighbourhood needs.

Removing that authority weakens accountability and distances important decisions from the communities most affected by them.

The implications of Bill 98 are significant and potentially irreversible.

For these reasons, BurlingtonGreen continues to urge Council to publicly and unequivocally identify the risks Bill 98 poses to Burlington's climate targets, housing affordability, and ability to manage growth sustainably.

We encourage Council to clearly articulate how this legislation undermines the City's ability to achieve specific Climate Action Plan objectives and greenhouse gas reduction targets.

And we ask Council to continue advocating strongly for the retention of municipal authority to implement climate-responsive planning policies, sustainable development standards, and other tools necessary to build resilient communities.

The Province's decisions today will shape Burlington for generations.

It is therefore essential that the climate, environmental, financial, and governance implications of Bill 98 be clearly acknowledged and communicated.

Thank you.

2. Re: Climate Resilient Burlington Plan update

I know Council cares deeply about making civic engagement more accessible, and I appreciate that this item was pulled for discussion. Climate-related reports should be front and centre whenever possible. The expectation that residents know who their Councillor is, understand committee processes, and know how to request an item be pulled can itself be a barrier to participation.

As BurlingtonGreen noted when the Climate Action Plan was presented, plans alone do not create change. Their success depends on implementation, resources, and sustained commitment.

The Climate Resilient Burlington Plan contains many important recommendations, but they will only have an impact if they are adequately resourced and prioritized. BurlingtonGreen is already helping to advance several of these actions through community engagement, tree planting, invasive species management, and environmental stewardship programs. However, the scale of the climate challenge requires a coordinated effort across the municipality, community organizations, businesses, and residents. Plans don't reduce emissions—people and budgets do. When the City declared a climate emergency in 2019, Council committed to increasing the priority of climate action across plans and budgets. Yet today, there is not sufficient capacity within City Hall to implement this Plan at the scale and pace required.

This work is becoming increasingly urgent.

Some of you may be aware of the recent David Suzuki Foundation event held at the Burlington Performing Arts Centre, followed by a smaller stakeholder workshop in Milton that BurlingtonGreen helped support. A key message from those discussions was that while climate mitigation remains essential, communities must also focus on adaptation and resilience.

The reality is that municipalities cannot respond to every climate-related emergency alone.

The workshop explored scenarios involving extreme heat, flooding, prolonged power outages, and other climate-related disruptions. Participants discussed what community preparedness looks like when municipal resources are stretched and residents need to rely on neighbourhood networks, local organizations, and community leadership.

My takeaway was that Burlington, like many communities, would face significant challenges during a major climate-related emergency.

That is why Climate Resilient Burlington is so important. Climate resilience is not simply about infrastructure. It is about people, ecosystems, neighbourhoods, and our collective capacity to respond to change.

That brings me to Action 2.5: **the development of a Biodiversity Action Plan.**

BurlingtonGreen strongly supports making a Biodiversity Action Plan a priority for 2027.

Climate change and biodiversity loss are interconnected crises. Healthy ecosystems are among the most effective and cost-efficient forms of climate infrastructure available to us.

Biodiversity helps communities withstand heat waves, flooding, invasive species, and extreme weather events. Wetlands absorb stormwater. Trees cool neighbourhoods. Naturalized areas support pollinators and improve ecosystem health. Diverse ecosystems are more resilient and better able to adapt to changing conditions.

A Biodiversity Action Plan would provide a roadmap for protecting and restoring habitat, improving ecological connectivity, expanding urban forest cover, managing invasive species, and supporting nature-based climate solutions.

Importantly, Burlington does not need to start from scratch. Municipalities such as Hamilton have already developed comprehensive Biodiversity Action Plans. Burlington can build on those best practices and adapt them to local needs.

BurlingtonGreen would welcome the opportunity to help support this work.

Finally, I would encourage Council to consider how property maintenance standards align with the City's climate resilience goals.

While the City's property maintenance standards do not directly conflict with climate objectives, they can create tension between traditional landscaping expectations and the nature-based approaches increasingly recognized as essential for climate adaptation.

Climate resilience requires biodiversity. It requires pollinator habitat, native plants, naturalized areas, and a healthy urban forest.

When residents who are trying to contribute to these objectives encounter barriers or uncertainty, it raises legitimate questions about whether our policies are fully aligned with our goals.

As Burlington advances Climate Resilient Burlington, there is an opportunity to review property maintenance standards through a biodiversity and climate adaptation lens to ensure they support, rather than inadvertently discourage, nature-based climate solutions.

Municipal climate resilience is inseparable from biodiversity.

If Burlington is serious about preparing for climate impacts, reducing flood risk, protecting its urban forest, and building resilient neighbourhoods, biodiversity must be treated as a core component of climate action.

Thank you for your leadership on this important work, and I look forward to seeing these recommendations translated into meaningful action.

Respectfully,

Amy Schnurr

A handwritten signature in cursive script, reading "Amy Schnurr".

Executive Director
BurlingtonGreen Environmental Association