

Submission for ERO 026-0300: Comments on Bill 98

To the Environmental Registry of Ontario,

As parents and caregivers in Ottawa, we are writing to express our deep concern regarding Bill 98, the Building Homes and Improving Transportation Infrastructure Act, 2026. We urge the government to amend or remove the sections that strip our local community of the power to protect our children's health and future. Our opposition is based on the following:

1. The Government Must Prioritize Children's Health

- **Improved Air Quality:** Bill 98 prohibits municipalities from requiring higher environmental construction standards than the minimum Building Code. Natural gas heating, used in roughly 75% of Ontario homes, releases CO₂ as well as pollutants like nitrogen oxides and fine particulate matter, which are directly linked to asthma and reduced lung function in children.
- **Climate Resilience:** High-performance buildings stay warm much longer during power outages, such as the winter ice storms common in Ottawa. By banning mandatory green standards, the government is forcing our children to live in homes that are less safe during extreme weather events.
- **Standards are not Redundant:** The government claims repealing the climate requirement in the Planning Act is just removing "redundancy". We disagree. Removing a binding legal requirement for climate action and replacing it with a non-binding policy is a direct rollback of the standards meant to protect our citizens.

2. Responsibility for Affordability and Future Costs

- **Hidden Costs for Families:** The government claims this Bill makes homes more affordable by lowering construction costs. However, building a home to code-minimum locks parents into decades of high utility bills. Net-zero homes are now often cost-neutral to build and save families thousands in energy costs over the life of a mortgage.
- **Expensive Retrofits:** Bill 98 bans cities from requiring EV-ready parking in new buildings. It is significantly cheaper to install charging infrastructure during construction than to retrofit it later. This shift in cost from developers to future homeowners is a financial burden on the next generation.

3. Protecting Municipal Authority and Equity

- **Loss of Local Voice:** Ottawa's community greenhouse gas emissions come largely from buildings (25%) and transportation (40%). Bill 98 removes the climate toolkit from our locally elected officials and gives that power to the provincial Minister. Decisions

about our transit fares and routes should be made by people who live in and understand Ottawa, not centralized elsewhere.

- **Equity in Transit:** The new *Fare Alignment and Seamless Transit Act* allows the province to redistribute transit revenue. We are concerned this could lead to service cuts or fare hikes for local systems like OC Transpo and Para Transpo, which low-income families and children rely on daily.
- **Weakening Public Safety:** Opening HOV lanes to single-occupancy vehicles undermines the incentive for carpooling and transit use. This increases congestion and pollution in our neighborhoods, directly harming the air our children breathe.

Conclusion

The role of government is to set standards that ensure the long-term well-being of its citizens. Bill 98 does the opposite by lowering the bar for developers while increasing health risks and financial costs for families.

We ask that you:

1. **Restore** Section 16(14) of the Planning Act to keep climate action as a binding legal requirement for all cities.
2. **Remove** the prohibition on municipal green building standards so Ottawa can proceed with its High Performance Development Standard.
3. **Delete** the ban on mandatory EV charging requirements to ensure our infrastructure is ready for the future.
4. **Maintain** local municipal control over transit fares and service standards to ensure our local needs are met.

Our children deserve to grow up in homes and communities that are healthy, resilient, and sustainable.

Signed,

For Our Kids Ottawa-Gatineau