



Ontario
Home Builders' Association

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August 21, 2020

Antonia Testa
Ministry of the Environment, Conservation and Parks
135 St Clair Ave W
Toronto, ON M4V 1P5

Re: Proposed regulation for a streamlined environmental assessment process for the Ministry of Transportation's Greater Toronto Area West Transportation Corridor project.
ERO Registry Number: 019-1882

Re: Proposal to exempt various Ministry of Transportation projects from the requirements of the Environmental Assessment Act.
ERO Registry Number: 019-1883

OHBA is supportive of the *Made-in-Ontario Environment Plan* and the *Housing Supply Action Plan*. A key component of both these plans is to modernize the environmental assessment program and streamline environmental approvals. OHBA has been engaged with the MECP's modernization efforts through submitting recommendations responding to *Modernizing Ontario's Environmental Assessment Process* (ERO 013-5101) in May 2019. Additionally, our association passed a resolution (Modernization of Approvals) at our AMM in September 2019 and the OHBA *Made in Ontario Environment Plan* Submission in early 2019. OHBA has consistently supported streamlining the Environmental Assessment process. OHBA believes that by eliminating duplication, the provincial government can shorten timelines, reduce delays, and focus the province's resources on projects that matter most to Ontario communities.

The current environmental registry (019-1882) posting proposes a regulation to "update the existing environmental assessment process for the Ministry of Transportation's GTA West Transportation Corridor. The regulation would create a new streamlined process for assessing potential environmental impacts of the project as well as consulting on it." OHBA is supportive of advancing the GTA West Corridor in as expedient a manner as possible to relieve congestion, move goods efficiently and to support growth and economic activity in the neighbouring regions such as Halton, Peel and York.

The current environmental registry (019-1883) posting proposes a regulation to "exempt select Ministry of Transportation projects from the requirements of the Environmental Assessment Act, subject to conditions for environmental protection: the Bradford Bypass and several Ministry of Transportation Provincial Transportation Facilities class environmental assessments (Class EA) projects." OHBA is supportive of advancing these critical transportation projects in as expedient a manner as possible to relieve congestion, move goods efficiently and to support growth in a variety of jurisdictions.

As part of OHBA's June 2020 submission to Ontario's Economic Jobs and Recovery Committee, OHBA recommended that the MECP fast track the implementation of the *Made in Ontario Environment Plan* including Municipal Class Environmental Assessments. It is important to recognize that as we reopen the economy to recover from the detrimental effects of COVID-19, we will need to continue delivering housing supply, jobs and economic activity to Ontarians. Following the 2007-2008 economic recession, the residential construction sector in played a key role in helping our province rebound economically by delivering new housing and renovations, spurring economic activity and creating jobs across Ontario. Our sector is ready and able to help Ontario rebound from the economic disruption caused by COVID19, as we did back in 2008.

In OHBA's June 2020 submission to Ontario's Jobs and Recovery Committee, a key recommendation with respect to infrastructure stimulus stated:

As part of a sustainable economic recovery plan, the province should accelerate major infrastructure projects. OHBA supports coordinated infrastructure investment towards strategic projects based on clearly defined priorities. These targeted stimulus investments should support other provincial objectives such as the efficient movement of goods and people. OHBA believes the expansion of "core" infrastructure (roads, transit, water and wastewater) in support of delivering much-needed housing supply to a growing [#homebeliever](#) population should be a key priority for the provincial government.

OHBA believes that the two regulatory proposals (ERO 019-1882 and 019-1883) will support the acceleration of major infrastructure projects. The OHBA Ontario Jobs and Recovery Committee submission further stated:

...advancing the GTA-West Corridor EA and the North West GTA Energy Infrastructure Corridor would have the added benefit of clearly defining the detailed route of the corridor and thus allowing the release of significant strategically located lands for housing and employment that are currently frozen. OHBA supports rapidly advancing these corridors and releasing strategically located lands as part of the COVID19 recovery plan. Now is the opportunity to secure provincial and federal funding and rapidly advance projects that will create jobs immediately long-term economic prosperity.

OHBA's joint submission with BILD in June 2020 (019-1503) also supported the advancement of the GTA West Corridor as have previous OHBA Pre-Budget submissions. We support the announcement by the Ministry of Transportation on August 7th of the Preferred Route and 2020 Focused Analysis Area for the GTA West Transportation Corridor Route Planning and Environmental Assessment Study. This in addition to the current regulatory proposals are important steps towards advancing this critical piece of infrastructure.

OHBA strongly believes that there are opportunities for the province to streamline Ontario's EA process to ensure that Ontario is open for business while balancing environmental protections. OHBA is supportive of the *Made-in-Ontario Environment Plan* commitment to "modernize Ontario's environmental assessment process, which dates back to the 1970s, to address duplication, streamline processes, improve service standards to reduce delays, and better recognize other planning processes." OHBA notes that the current process takes too long, costly, uncertain and often involves multiple government authorities.

While most Ontarians understand that Ontario is growing, the real elephant in the room, is the magnitude of this growth. The Ministry of Finance projects that there will be 2.6 million more people living in Ontario by 2031. The just-released reference case scenario by Hemson Consulting as part of the Schedule #3 population and employment forecasts for the Growth Plan for the Greater Golden Horseshoe is forecasting a 2051 population of 14.875 million people. This is a significant increase from the approximately 10 million people that call the region home today- growth that will need new housing, require new transit and roads to move both people and goods around the GTA efficiently.

The current Environmental Assessment process is simply undermines the future prosperity of the province, and requires modernization to ensure Ontario has the proper infrastructure in place to support incoming growth. OHBA supports the MECP regulatory proposal exempting these select projects to allow the MTO to maintain and implement critical roadway infrastructure in Ontario and to facilitate the movement of people across the province. It will also allow the province to focus its resources on more significant, complex infrastructure projects with the highest potential for environmental impacts.

On behalf of OHBA's 4,000 member companies organized into a network of 27 local home builders' associations across Ontario, OHBA appreciates the opportunity to provide the provincial government with our feedback and recommendations. The new housing and land development industry is a key partner to the province in building new communities that will support provincial transportation plans and investments over the long term. We hope to see more shovels in the ground on priority projects in the near future, and look forward to continuing to work with the MECP to reduce the administrative burden, impacting the timely construction of core infrastructure.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Collins-Williams', written in a cursive style.

Michael Collins-Williams, MCIP, RPP
Director, Policy
Ontario Home Builders' Association

c. Hon. Jeff Yurek, Minister of the Environment, Conservation and Parks