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Ministry of the Environment, Conservation & Parks
135 St Clair Ave West, 1st Floor
Toronto, ON M4V 1P5

**Re: Proposed changes to environmental approvals for municipal sewage collection works
EBR Registry Number: 019-1080**

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, passing 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 redundant ECA process for SWM facilities and in particular SWM ponds that require sign off by the MECP following municipal approvals.

The current environmental registry (019-1080) posting proposes to “modernize Ontario’s environmental approval process for low-risk municipal sewage works by implementing a Consolidated Linear Infrastructure Permissions Approach. The proposed approach will consolidate and update the approvals process for these types of works and incorporates measures that will enhance environmental protection.” OHBA is broadly supportive of this approach and within this submission we have detailed and technical recommendations to further strengthen the provincial government’s modernization proposals.

As part of OHBA’s June 2020 submission to *Ontario’s Economic Jobs and Recovery Committee* submission, OHBA recommended that the MECP fast track the implementation of the *Made in Ontario Environment Plan* including storm and sanitary infrastructure approvals. It is important to recognize that as we reopen the economy and recover from the detrimental effects of COVID-19, we will need to continue delivering housing supply, jobs and economic activity to Ontarians. Based on historic averages, there are approximately 70,000 – 75,000 new housing starts in Ontario on an annual basis. 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.

OHBA strongly believes that there are opportunities for the province to streamline Ontario’s environmental approval process for low-risk activities 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, is too expensive and uncertain and often involves multiple government authorities.

In our *Made-in-Ontario Environment Plan* submission (January 2019), OHBA cited a case example in Ottawa that demonstrated duplication that provides no additional value to either the project or public interest. In this example, when the City of Ottawa was granted transfer of review authority over SWM, city staff compiled data and found that for the previous 103 SWM pond applications made under direct submission only a few were returned for reasons such as, not filling out the applications correctly, incorrect orientation of north arrows on plans, etc. Of the 103 applications there were never any technical or environmental changes required. OHBA believes that there is no value being added by having the MECP involved in the process after master plans are approved.

OHBA believes that the current proposal achieves the objectives outlined in our recommendations in the OHBA *Made-in-Ontario Environment Plan* submission:

-) EAs and ECAs: OHBA recommended MECP undertake a comprehensive review of all EA processes and Environmental Compliance Approvals (ECAs) to streamline, reduce red tape and eliminate duplication. Furthermore, MECP should establish timelines/service standards. OHBA also recommended that the monetary threshold for which an EA is required be increased (or eliminated) and that the MECP adopt a risk based approach.
-) Storm Water Management: It is time consuming, expensive and frustrating that there can be four levels of government review (local/regional/conservation authority/ministry) after an application is prepared and stamped by a Professional Engineer. The entire process should be streamlined by:
 - Reducing ECA review timelines and establishing service standards;
 - Eliminating the duplicative MECP review process for SWM work that can add months to timelines with no added value; and
 - Respect professional designations for the purposes of ‘certified approvals’ by professional engineers.

OHBA is supportive of the MECP intention that a “Consolidated Linear Infrastructure Permissions Approach” will change the current permissions framework for low-risk sewage works by consolidating approvals for linear infrastructure (e.g. sanitary collection, stormwater works). It is OHBA’s understanding that one ECA will include approval for all municipal stormwater works in one area, and one ECA will provide approval for all municipal sanitary sewage works in one area (i.e. municipality). Such an approach will be a substantial improvement over the current approach whereby the MECP issues over 700 decisions each year for routine and low risk sewage works as ECA applications are being submitted on an individual basis/pipe-by-pipe approach and whereby there is significant duplication with municipal approvals processes.

OHBA has a number of specific technical recommendations for MECP responding to ERO 019-1080:

SWM ECA COMMENTS:

-) **Transition Policy:** OHBA recommends that storm, sanitary and SWM infrastructure be immediately approved by the municipality on behalf of the Ministry based on the proposed design criteria and guidelines, even before their entire system is transitioned. The industry concern is that it could take years to transition a municipality’s system into the new regime and the approved infrastructure can be incorporated with the remaining municipal infrastructure when the transition occurs. This process would enable the immediate processing improvements occur which are required to expedite projects during this critical time in which we need economic stimulation;
-) **Table 3** – Revise Oil/Grit Separator to read Manufactured Treatment Device (apply throughout);
-) **4.1.1 d)** - Storm sewers routinely collect groundwater from foundation drains, road sub-drains, LID overflows etc. If this condition is retained, it should specifically exclude these items or reference items included in Section 6;

- J **4.1.2** – The condition includes a statement that no MH’s can be surcharged. There are occasions where municipal storm sewer systems are designed as on-line control facilities so this must be recognized. Add “unless specifically designed as an on-line quantity control storage system”. Note that Section **5.1.3** allows “superpipe storage”;
- J **4.1.3 d)** – “Adverse” should be defined or this condition should be expanded with the following “which results in the downstream facility not being able to achieve the overall stormwater design criteria”. There are many cases where stormwater systems are expanded to utilize the residual capacity of an existing SWM quality control facility – the new discharge would adversely impact the effluent quality, but it would still be within the original design parameters of the existing SWM quality control facility.
- J **4.2.2** – The currently proposed ECA process excludes pipes greater than 2400mm dia. OHBA questions to rationale to limit pipe size. The industry quite often designs and builds large trunk storm sewers or box culverts that would exceed this minimum amount. They go through the same design criteria and municipal review that smaller pipes go through. This would result in needless ECA submissions to the Ministry. This would also likely require that the entire storm system goes to MECP for approval since the remainder of the system likely can’t be built separately from the larger trunk sewer. OHBA recommends that there is no need for any restriction in storm sewer size, especially if it is a readily available pre-cast or manufactured product;
- J **4.2.5** – The current proposed ECA process excludes storm sewers that convert rural to urban sections AND increase runoff without water quality treatment. What is the intention of this clause? A typical new intersection connection to an existing rural boundary road will inevitably have some amount of increased pavement and therefore runoff which may need a direct connection to the existing rural road ditch system. Quality control would typically not be provided for a single catchbasin or very small drainage area that outlets to a rural ditch system at such an intersection improvement. Why exclude this storm sewer design from the ECA process – it will meet the design criteria and will have municipal review. Can this clause be scoped to exclude minor improvements?;
- J **4.2.8** – This item requires a concluding condition “unless the existing storm system has sufficient residual conveyance and treatment capacity to accommodate the additional drainage;”
- J **5.1.4** – No municipality will allow “reduced” lot grading, less than their municipal criteria which his typically 2%, however, an appropriate criteria would be to use “minimum” lot grading (2 or 3%);
- J **5.1.15** - Is there a definition for “Artificial Wetland”? OHBA recommends including “Hybrid Wetland” and “Wetland SWM Facility”;
- J **5.2.5 a)** This should refer to ETV certification and that the resulting removal rate per ETV should be applied to a maximum of 60%;
- J **5.2.6** - The obligation for a municipality to own, operate and maintain private stormwater works such as rear lot infiltration facilities will essentially result in private lot LIDs being eliminated as a treatment train tool in most municipalities since they will likely not accept this obligation. The industry has been successfully using private lot LIDs such as extra depth topsoil, disconnected roof leaders and passive infiltration trenches along rear lot lines. Passively designed private lot LID such as rear yard infiltration facilities with appropriate factors of safety should similarly be recognized as aiding the overall volume control and contributing to water balance without the need for municipal involvement. While the Drainage Act provides a very practical and reasonable method to implement municipal control over private infrastrucrue, the successful implementation of the desired volume control with an “at source” approach can only be achieved with successful private lot implementation of LID and the imposition of municipal obligations for these facilities will severely limit the ability to implement this approach;
- J **5.3.1** - Regional SWM ponds are becoming much more routine and are done in accordance with larger watershed, sub-watershed or planning related studies which have all been vetted by various public agencies and are part of a public process. OHBA strongly recommends that these regional facilities should be included for all the same reasons the other infrastructure is. Leaving out Regional SWM facilities would be a significant oversight and is an artificial limitation;
- J **5.3.4** – Limiting the applicable drainage area to a SWM facility to 15ha will exclude most municipal SWM facilities. There is no reason to include a drainage area restriction. Every SWM facility will go

- through the same agency and public review process through the planning process. Drainage area is an irrelevant condition and if utilized, would result in unnecessary review by the Ministry and significant project delays;
- J **6.1.1 b)** – This clause correctly includes stormwater, groundwater and foundation drainage, which is inconsistent with **6.1.1** of the sewer design criteria, which says that a Foundation Drain Discharge Collection System can only be designed to collect water from foundation drains. It is quite common to design a “clean water collector” system which can accept water from foundation drainage, rear lot drainage or roof drainage for discharge to a protected headwater drainage feature. Section **6.1.1** of the sewer design criteria should be updated to reflect this requirement. Clause 6.1.1 b) should be updated to include roof drainage, which is commonly collected in a “clean water” storm sewer collecting a combination of roof, foundation drain or vegetated areas;
 - J **7.1** – When outletting to lands not owned by the municipality and permission or easements cannot be obtained, the reference to “water balance” should be specific to maintaining runoff volumes which drain to off-site lands without riparian rights. If Riparian Rights apply (i.e. there is a defined watercourse present or the area is otherwise regulated by a public agency) , this should be specific to maintaining only infiltration water balance;
 - J **Schedule E – 2.2** - This clause should be consistent with the individual design criteria for SWM facilities. “Free of” settleable solids is not a design-criteria in accordance with the 2003 SWM Guidelines;
 - J **Schedule E – 4.1.3** - Is there a definition of “significant flooding events”?
 - J **Schedule E – 4.1.4 d) vi)** – Why are monitoring records of TSS, Temp., DO, pH, Conductivity etc. required for SWM facilities that are designed in accordance with MECP guidelines which have proven results?
 - J **Schedule E – 5.1.2** – It should be clarified that the Owner’s Engineer may act as the Qualified Person until such time that the SWM facilities ownership is turned over to the public agency;
 - J **Schedule E – 5.5** - It should be clarified that this is the long term municipal monitoring program and not the interim inspection program that immediately follows construction and is undertaken prior to assumption of the SWM facilities by the respective public agency;
 - J **Schedule E – 5.5.9 & 5.6** - Clarify that an Adaptive Management approach is for the long term municipal SWM program, and not for the interim post construction stage prior to assumption by the respective public agency;
 - J **Schedule E – 6.2.7** – OHBA recommends that “abnormal discharge event” be defined.
 - J **Schedule E – 6.3.1** - Clarify that this does not apply during the interim ownership stage, prior to assumption of the SWM works by the respective public agency.

Appendix A – Design Criteria

- J **Water Balance – Lake Simcoe Watershed & Water Quality - Phosphorous** – The criteria currently requires the use of the LIDTTT tool for assessing the water or Phosphorous balance. This is a useful tool, however there are other acceptable methods that are routinely used. This criteria should be modified to not be specific to a water or Phosphorous balance evaluation tool, or provide the LIDTTT tool as an example of an acceptable tool;
- J **Water Quality – Phosphorous** – Is the use of “or” applicable since the two points are independent of each other, for separate watersheds?
- J **Water Quality – Phosphorous ii)** – change “Proponents” to “Development Sites;”
- J **Erosion Control iii)** – “detain a minimum of 25mm” should be changed to “detain a minimum of the runoff volume from a 25mm storm;”
- J **Construction and Erosion Sediment Control** – The CSA ESC Std was generally incorporated into the TRCA ESC Guideline. The TRCA guideline provides a wealth of ESC information and tools, however we note that the CSA ESC standard is still being reviewed in the field to determine if it is in fact achievable. What happens if it is determined that the CSA standard is not achievable?

- J **Table 2** – OHBA is concerned with how we address the very real constraint of municipal acceptance. There are municipalities who will simply not allow LIDs in their ROW, parks or even on private lots. This is a very real constraint that needs to be considered;
- J **Table 3** – Erosion Control - < 0.1ha - Erosion control often requires detention via an orifice control. Sites less than 0.1ha would be impractical to control on this basis. Erosion and Sediment Control during construction can be achieved, however long-term erosion control is not practical for small infill sites on a site by site basis. An objective for 5mm retention (as opposed to a “criteria” would be more appropriate for sites less than 2ha in size;
- J **Table 3** – Flood Control - 0.1ha to 5ha sites – The need for flood control is typically determined through a large-scale watershed or subwatershed study. It is not practical or feasible for a small site, less than 5ha to undertake such a study. In fact, this is generally impractical and unfeasible for any individual development application to undertake and should typically be a developer group, municipal or Conservation Authority led study for watersheds or sub watersheds or new large development areas, typically for a new Secondary Plan or other large and often multi-ownership development area (i.e. >500ha);
- J **Table 3** – Monitoring: 0.1ha to 5ha sites - Monitoring is an onerous and costly undertaking that is likely not practical or feasible for a small site. Appropriate inspection and certification is always necessary, and should be sufficient for smaller sites;
- J **Table 3** – Footnote #7 – replace “stringer” with “stricter.”

Storm & Sanitary Design Criteria

- J **1.1.1 1) a)** – It is not uncommon to exceed the uncommitted reserve hydraulic capacity of a trunk sanitary sewer system, subject to the realization of actual flows and appropriate hydraulic grade lines for I/I related events. The reference to the collection system should either be excluded or acceptable parameters established (i.e. no surcharge in dry weather flow or no impact to basements in wet weather flow);
- J **1.1.3 2)** – A downstream analysis of Uncommitted Reserve Capacity is not always required. A qualifier should be added to the end of this clause saying that it is only required when required by the municipality and to be completed to the satisfaction of the municipality. The concern is that this is not always an appropriate or required assessment and if it is required, there is always the question of how far downstream the analysis is required – this is typically determined by the owner of the system;
- J **1.2.3** – “Rehabilitation” should be deleted from this clause since it can’t anticipated what rehabilitation methods will be used in the future;
- J **1.2.5** – The use of the word “avoided” may create some confusion for the implementation of this clause. It is routine that sanitary sewers occasionally need to cross a floodplain and it is very routine that sewers have to be installed within the seasonally high groundwater. This needs a qualifier to recognize this point (i.e. “unless there is no other reasonable alternative”);
- J **2.1.3, 2.1.4 & 2.1.5** – are the Commercial, Institutional and Industrial Flows inclusive of I/I and peaking? This should be clarified;
- J **2.4.2** – “full” should be added in front of “flow” to confirm that the 0.6m/s velocity target is based on full flow pipe capacity;
- J **2.9** - It is very routine to install sanitary sewers below the seasonally high groundwater table. Utilizing forcemain grade pipe and wrapping all manholes, using watertight lids with venting systems far exceeds the current design standards in most municipalities. Forcemain pipe would also not accommodate the numerous service connections required. The objective is to minimize I/I to the systems. While best practices should be followed in all cases, current gasketed manhole connections and typical gasketed gravity sewer pipe is very effective to minimizing I/I if properly installed and certified. The certification process should be the focus where higher groundwater exists, as opposed to forcing overly onerous criteria;
- J **2.10.1** – Consider increasing the allowable MH spacing to minimize connection points;

- J **2.10.3** – The criteria to add an additional MH at every connection point to the existing municipal system to facilitate flow monitoring would unnecessarily increase municipal infrastructure costs and is not a current requirement. Site specific constraints would also quite often make this request unfeasible. The criteria should require a suitable monitoring location as opposed to a designated separate manhole which would add overall infrastructure cost and would increase risk to the system;
- J **2.10.11** – The need for using frost straps on manholes should continue to use the existing MECP criteria which states that frost straps are to be considered in areas where the freezing index is greater than 500 freezing degree-days Celcius. The addition of frost straps could add approximately \$1000 perm MH. While their use may be appropriate in northern Ontario, locations such as the City of Toronto have freezing degree days of 467.1 from 1976 to 2005 and projections of only 282.3 from 2021 to 2050 due to climate change (data from https://climateatlas.ca/map/canada/fdd_2030_85#z=5&lat=43.39&lng=-69.21&city=458) ;
- J **2.10.13** – The use of gasketted MH connections should be sufficient in higher groundwater areas. Wrapping all MH's would be very onerous and will not provide the appropriate cost/benefit;
- J **2.12.4** – The use of vertical risers with settlement joints should be a design consideration where a 1:1 service connection approach is not achievable. Similarly, a short radius bend may be required where a long radius bend can not be utilized. These alternatives should be available where required;
- J **4.0** – Combined sewers can't be extended and no storm connection can be added to a combined sewer. OHBA questions what happens if there is no alternative? This occurs frequently when infill development occurs in older municipalities with only combined sewers. A criteria should be established for this scenario which can then be administered by the municipality, to avoid numerous unnecessary submissions to the Minsitry.
- J **5.1.1** – “Stormwater” is not a defined term, but storm sewers should also be defined to collect groundwater through foundation drains, road sub drains, filtration LIDs etc.;
- J **5.1.3** – Requires an integrated treatment train approach – what if the municipality won't allow that to happen? There is no alternative or qualifier for this clause;
- J **5.1.6** – This clause should recognize that some inlet times must consider external undeveloped areas that would not be appropriate to be considered as a developed state;
- J **5.2.3** – This clause appears to be recommending the use of higher runoff coefficients for infrequent storms, which is a typical design criteria in many municipalities. The clause should be clarified that the use of the higher runoff coefficients would be for 50 or 100 year storm analysis and that the lower range is acceptable for 2 o 5 year storm analysis;
- J **5.2.3** – The reference to Table 2 should be changed to Table 3;
- J **5.4.3** – The use of 1% minimum slope for the first leg of a storm sewer is not a typical or required criteria – this would only be expected for sanitary sewers. This criteria should be deleted in relation to storm sewers;
- J **5.7.1** – This clause needs to also include the use of pre-manufactured bends which are typically used without the use of an adjacent MH;
- J **5.8.2** – The reference to Table 5 should be Table 6;
- J **6.1.1** – FDC systems are now sometimes also designed to take clean water from rear lot CB's or roofs to provide water balance to specific features. OHBA recommends that this clause be modified to include “clean water collection” system together with FDC. The criteria should require that there can be no surcharge in the system;
- J **6.1.5** – FDC systems are most often used in relatively flat upstream headwater areas. A minimum slope of 1% would usually not be achievable for these systems. 0.4% would be more appropriate as a minimum grade as anything greater will often not be achievable in an area with road grades at 0.5%.

Sanitary ECA Template:

- J 4.2.1 – There are cases where the Conservation Authority’s preference is to open cut through smaller water courses. This design and construction methodology would be reviewed in detail through the planning process and would obtain a permit from the CA. These types of crossings should be included. OHBA recommends that the MECP consider adding a qualifier based on the minimum width of an open cut section through a watercourse (i.e. 3m wide banks);
- J 4.2.2 – A trunk sanitary sewer design and built through the planning process would go through the same rigorous design, review and public process as any other smaller pipe. Consider either eliminating the minimum 750mm diameter criteria or considerably increasing the size (i.e. 1500) to only capture true large trunk sewers that would be more of a Regional trunk sewer, as opposed to something being built through the planning process for a larger Secondary Plan area which could easily exceed the currently suggested minimum pipe size.

Storm ECA Template:

- J 4.2.1 - There are cases where the Conservation Authority’s preference is to open cut through smaller water courses. This design and construction methodology would be reviewed in detail through the planning process and would obtain a permit from the CA. These types of crossings should be included. OHBA recommends that the MECP consider adding a qualifier based on the minimum width of an open cut section through a watercourse (i.e. 3m wide banks);
- J 4.2.2 - A trunk storm sewer design and built through the planning process would go through the same rigorous design, review and public process as any other smaller pipe. The industry routinely designs and builds trunk sewers larger than 2400mm diameter, including numerous concrete box culverts. This restriction should be removed for all pre-cast or manufactured pipe since all of the design considerations can be adequately addressed by the design engineer and the review agencies;
- J 4.2.5 – There are routinely instances where existing rural cross sections are converted to curb and gutter with an increased level of runoff. This occurs at most new urban local road connections to arterial rural road intersection locations, where a single catchbasin draining the intersection may be required to outlet to the existing arterial road ditch. This criteria should be eliminated or qualified to only apply to significant existing arterial road improvements (i.e. in excess of 2km);
- J 7.1 - The water balance reference should refer to “runoff volume” water balance for instances where the downstream lands are in private ownership and an easement is not available. The use of “water balance” without this qualifier could lead to confusion if agencies attempt to implement this on an evapotranspiration basis.

Clarity is Required – “New storm sewer system” vs “added, modified, replaced or extended”

- J It is OHBA’s understanding through the MECP consultation process that the storm ECA process does in fact include a *NEW* storm sewer system with an outlet to the environment, as opposed to simply being “added, modified, replaced or extended”. OHBA is concerned that this very important distinction is unclear based on the materials in the Environmental Registry posting. OHBA is supportive of including new storm sewer systems with new outfalls and recommends that MECP ensure this distinction is made crystal clear.

Training and Guidance

- J Once the MECP has finalized a modernized regulatory framework, OHBA recommends that the Ministry embark on a robust training process for municipal staff. Training should include guidance materials as an educational resource to ensure consistent municipal application of environmental approvals.
- J OHBA is concerned that there is a degree and culture of “fear of change” within some municipal bureaucracies. It will be important that the MECP undertake a leadership position in rolling out a modernized regulatory framework and in delivering guidance for the initiative to succeed.

J In relation to guidance, OHBA notes that some municipalities (i.e. Barrie/Innisfil/Halton) have demonstrated local leadership with respect to streamlining and implementation. Success stories should be highlighted.

Excess Soil O.Reg. 406/19 sediment sampling rules for SWM pond sediment reuse/disposal projects

While not directly correlated to the ERO 019-1080 posting, OHBA has comments related to the new Excess Soil O.Reg. 406/19 sediment sampling rules for SWM pond sediment reuse/disposal projects. For the past 15 years, the industry standard of practice has been to collect insitu sediment chemistry samples from undrained pond basins. This allows the sediment to remain in place while disposal/reuse plans are being developed and approved. However, the new exsitu rule would require the sediment to be removed from the basin, dried and stockpiled before the samples can be collected and analyzed. Unfortunately, most SWM pond properties do not have enough onsite space to allow for stockpiling. This would leave two options:

- 1) Double handle the underwatered sediment by moving it to a temporary dewatering site (if one is available), where it would remain until it has been approved for reuse at permanent reuse site; or
- 2) Drain the pond and add dewatering/bulking agents to the sediment while it is still in the basin. This process can be very expensive while also changing the content and consistency of the sediment so that it may no longer be useful as landscaping soil.

OHBA would like to draw MECPs attention to potentially adapt this exsitu sampling requirement if a pilot study can demonstrate that the same chemistry results can be produced by either the in situ or ex situ sampling methods. OHBA believes that the MECP should carefully consider the implications of such a public policy approach to utilize sediment as a resource rather than a waste to limit red tape and limit cost implications for ECA and SWM facilities.

Conclusion

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 for modernization and renewal of Ontario's environmental approvals for municipal sewage collection works.

The current process for ECAs is slow and ineffective, taking years for some projects to navigate the process, and thus slowing down important infrastructure projects that help Ontario communities. As such, OHBA looks forward to continuing to work with the MECP to reduce the administrative burden, impacting the timely construction of basic sewage and storm water infrastructure. OHBA believes that the proposed changes by MECP along with adopting OHBA's recommendations in this submission would support the provincial government's modernization initiative as they would exempt low-impact projects, eliminate duplication and find efficiencies in the planning process.

Should you have any questions or would like to schedule a time to discuss our submission in further detail with members of OHBA's Environmental Approvals sub-committee, please contact the undersigned.

Sincerely,



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Ontario Home Builders' Association

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