



**Ontario**  
Home Builders'  
Association

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Environmental Assessment Branch  
135 St. Clair Ave W  
Toronto, ON  
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**RE: Clarifying the Authority to Change the Classes of Projects to Which a Class Environmental Assessment Process Applies (ERO Posting # 019-4189)**

The Ontario Home Builders' Association (OHBA) appreciates the opportunity to provide comments regarding the *Environmental Registry (ERO) posting # 019-4189*. We understand that the purpose of this initiative is to clarify the authority of the Ministry of the Environment, Conservation and Parks (MECP) to change the classes of projects to which a Class Environmental Process applies under the *Environmental Assessment Act (EAA)*.

OHBA continues to support provincial actions which streamline processes and approvals to facilitate the implementation of infrastructure required to support housing availability in the province. This initiative represents the province's ongoing work to modernize the environmental assessment program. OHBA has been working closely with MECP staff in this regard to gain efficiencies in the approval processes that promote housing choice for residents of Ontario.

OHBA understands that the current initiative is an administrative clarification to confirm that the authority to amend a Class EA and a Class EA approval includes changing the types (or classes) of projects that can follow a Class EA. The proposed Class EA amendment is intended to shift a large number of projects to a lower schedule classification. This would streamline the process for projects that have low environmental impact potential and for those projects that are already included in the planning approval process and as such would receive significant and complete environmental scrutiny through the mandated approval process.

We understand that the current action is of an administrative nature to ensure there are no issues with implementation of the class changes being proposed. It is independent of the other major MECP initiatives including:

- Moving to project lists that would require an EA based on impact and project type, and
- Replacing Class EA's with a streamlined assessment framework that has consistent requirements.

The province did initiate discussions in the fall of 2020 on the project lists for those projects requiring a comprehensive EA. OHBA participated in those discussions. These included large infrastructure projects but excluded those that would typically be associated with an individual development (i.e., a transmission line, transformer station, hydroelectric facility, landfill site, waste disposal site, thermal treatment site, provincial freeway, municipal expressway, major flood/erosion/conservation project, intra-provincial railway, mining site).

In July 2021, the province did downgrade some electricity projects from individual/comprehensive EA's to a Class EA by excluding the following.

- Projects under 75km in length and 345 kV or less
- Projects under 2km in length and 115 kV or less

More recently, similar downgrades were announced by the province regarding highway projects of a similar magnitude which included the Bradford bypass initiative. OHBA understands that further downgrades may also be considered on a go forward basis. OHBA is awaiting receipt of the project lists for the Class EA type projects and would appreciate receiving same as soon as possible.



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OHBA looks forward to the continuation of its working relationship and discussions with MECP staff to gain efficiencies which streamline the necessary approval processes related to project implementation and housing development. As such, OHBA supports MECP's current initiative to clarify the province's authority to include changing the classes (or types) of projects to which a Class EA applies. Thank you for the opportunity to comment at this time.