



**Ontario**  
Home Builders'  
Association

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**RE: Amendments to Exempt Low Risk Sewage Works from Requiring an Environmental Compliance Approval (ERO Posting # 019-4456)**

OHBA appreciates the opportunity to comment on the proposed amendments to exempt low risk sewage works from requiring an Environmental Compliance Approval (ECA) as posted in the *Environmental Registry of Ontario (ERO) # 019-4456* by the Ministry of Environment Conservation and Parks (MECP). OHBA continues to be supportive of MECP initiatives to cut red tape.

OHBA understands that this initiative would exclude private lot low impact developments (LID's) from the need for an ECA. This would be of significant benefit to our industry and is a step in the right direction by MECP to reduce duplication of the review and approval process which is already undertaken by other agencies. OHBA views this as a very positive move in that the proposed measures will be beneficial towards reducing approval timelines and will assist our efforts in the creation of much needed housing supply.

This subject matter has been the cause of significant confusion at the provincial, conservation authority, and municipal levels over the past several years. The changes proposed in the current *ERO* posting recognize the difficulties inherent in the approach taken by most municipalities whereby overall storm water management (SWM) reports have formed part of approved subdivision agreements, such agreements which are subsequently registered on title for each lot that is created.

The changes proposed will both avoid confusion and reduce the time required to deal with private lot LID matters. At the same time, OHBA feels that the changes proposed will encourage the use of LID's which may have the benefit of decreasing downstream SWM requirements.

Also, OHBA feels that the exclusion of foundation drainage and construction site dewatering as being proposed by the MECP is a very positive step. OHBA views the MECP as being proactive in striving to reduce process duplication and unnecessary red tape which seems to be routinely occurring. OHBA will closely monitor the evolution of this proposal.

OHBA looks forward to further communications with MECP regarding this initiative to streamline processes and requirements related to project implementation. As such, OHBA supports MECP's current initiative to exempt low risk sewage works from requiring an Environmental Compliance Approval. Thank you for the opportunity to comment at this time.