



URBANTECH®

May 9, 2023

Submitted via ERO website

Re: Evaluating Municipal Class Environmental Assessment Requirements for Infrastructure Projects, ERO No. 019-6693
Submission on behalf of the Milton Phase 4 West Landowner Group Inc. (Britannia Secondary Plan) (Milton, ON)

Thank you for the opportunity to provide input to this proposal. We understand it is the Ministry's intent to modernize the Environmental Assessment (EA) process to improve timelines for development while maintaining appropriate environmental oversight.

On behalf of the Milton Phase 4 West Landowner Group, we are supportive of this important initiative and offer the following feedback:

The recently approved amendments to the MCEA Study process (as outlined in ERO No. 019-5069) are a good first step in streamlining the EA process and shifting focus to high-risk projects. The ability to complete Archaeological Screening is helpful in that it provides timeline relief for some critical infrastructure.

Going forward, we agree with the Ministry's concept of revoking the Municipal Class EA and instead completing the planning, engineering and consultation work for low-risk projects as part of other complementary processes and technical studies (such as Master Servicing Plans, Secondary Plans, etc.). The ability to proceed with design and construction of critical infrastructure concurrently with environmental studies would directly support the shared objective to build more homes and help municipalities like Milton meet their housing pledges.

As a specific example, a new wastewater pump station and associated forcemains (located in south Milton) are needed to support significant growth in the Britannia Secondary Plan Area and North Halton. The pump station was identified in the Region's Master Plan and has been reviewed through the Town of Milton's Secondary Plan. Under the current EA process, a Schedule B EA Study is required, which could take up to two years to complete. The pump station will be located on lands within the urban boundary and outside of any environmentally sensitive areas. The forcemains will traverse natural features, but can be designed and constructed to minimize the environmental impact. With design and construction occurring after the EA is filed, it is estimated that servicing may not be available until 2028, or later. The Ministry's proposed EA modernization strategy would significantly accelerate the timeline for this low-risk project and, by extension, facilitate the construction of more homes.

In the interim, as the new EA process is developed, we would ask that the Ministry consider the following to help accelerate growth:

- Confirm (in writing) that the pump station and forcemain project is exempt from a full Schedule B EA and only subject to Archaeological Screening, or;

- Approve a full exemption of the pump station project from the EA process, as a pilot study for the streamlined EA process. We can assist the Ministry and the Local Municipalities to ensure comprehensive consultation and technical work is completed.

Thank you for your time and consideration. We would be pleased to provide input and/or review proposed changes to the EA process as information becomes available. If you have any questions or concerns please contact me directly.

Regards,
Urbantech® Consulting



J. David Leighton, C.E.T.
President

CC: Milton Phase 4 West Landowner Group
Delta Urban Inc.
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