



May 9, 2023

EA Modernization Project Team
Environmental Assessment Modernization Branch
135 St Clair Ave West, 4th Floor
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ERO No. 019-6693
Evaluating Municipal Class Environmental Assessment Requirements for
Infrastructure Projects
Submission on behalf of the Mattamy Homes

On behalf of Mattamy Homes we thank you for the opportunity to provide input to the proposed amendments to modernize the Environmental Assessment (EA) process in an effort to improve timelines for implementation of timely low-risk infrastructure projects where appropriate environmental oversight is maintained through other legislation. Overall, we are supportive of this important initiative and offer the following feedback:

- We are supportive of the Ministry's plan of revoking the MEA Class EA process and completing the planning, engineering, and consultation work for low-risk projects as part of other complementary processes such as Master Servicing Plans, Secondary Plans, Comprehensive Block Plans and similar processes. The ability to proceed with design and construction of low-risk routine municipal infrastructure concurrently with environmental studies directly supports our shared objective to build more homes and help municipalities we work in meeting both their environmental and housing objectives.
- 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 for lower risk projects and those projects where, in our experience there has been duplication of review and studies (geotechnical, environmental, natural heritage, transportation, noise, as examples) through the MEA Class EA and planning approval processes.
- Streamlining the EA process will result in shifting focus and resources – both financially and from a human resource perspective appropriately to high-risk projects. We are of the opinion that this will benefit municipalities, landowners and ultimately future homeowners through more timely delivery of homes and potential positive impacts on costs that are borne by future homeowners.

Through the above lens we see some potential areas that will need to be in place to support any proposed changes, specifically:

- Education sessions by MECP for development industry together with municipalities to fully understand and discuss the changes and importantly find ways to work together to make full use of the modernized process, and
- Ensuring front-facing staff with developers and municipalities at the Ministry of Environment Conservation and Parks have the depth of experience, training, initiative and support to work toward fully utilizing the new tools when reviewing projects. In our experience this will be particularly important at the outset of any proposed project when determining how it will proceed.

Thank you for your time and consideration and for taking these important steps forward to modernize the *Environmental Assessment Act* and ultimately associated legislation. We look forward to providing input and/or review proposed changes to the EA process as information becomes available. I would be pleased to discuss our experience on specific projects or any aspect of our submission at anytime, please do not hesitate to reach out as appropriate.

Sincerely,
Mattamy Homes



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