

March 15, 2024

By E-Mail Only to *eamodernization.mecp@ontario.ca*

Honourable Minister Andrea Khanjin
Minister of Environment, Conservation and Parks
Environmental Assessment Modernization Branch
777 Bay Street, 5th Floor
Toronto, ON M7A 2J3

Dear Minister Khanjin:

**Re: ERO Posting No. 019-7891
Modernizing Environmental Assessment for Municipal Infrastructure
Comments of Aecon Infrastructure Management Inc.**

We are counsel to Aecon Infrastructure Management Inc. (“**Aecon**”), the owner of multiple aggregate operations in the Province, including the Aecon Caledon Pit located in the vicinity of Highway 10 and Charleston Sideroad in the Town of Caledon (the “**Caledon Pit**”). The Caledon Pit has an area of approximately 572 hectares (1,413 acres).

Aecon is working toward productive reuse of the Caledon Pit which is proximate to the Village of Caledon. Aecon’s vision for the Caledon Pit, post-extraction, is that it becomes a vibrant community, complete with natural areas, parks, and all the other hallmarks of a thriving place. The Town of Caledon has expressed a similar vision in its Rehabilitation Master Plan.

Aecon welcomes the government’s modernization of the environmental assessment process for municipal infrastructure projects which will help implement the vision for the Caledon Pit. The changes will ensure strong environmental oversight while we work together to bring the dream of home ownership into reach for more people.

For a site like the Caledon Pit, the proposed modernization would mean that the road system required before homes could be built would undergo thorough environmental and engineering review during the planning process, and that review would no longer need to be duplicated. Similarly, costly administrative procedures would not delay the implementation of clear infrastructure solutions, for example the use of modular sewage treatment plants to service the Caledon Pit lands.

The risk-based approach to modernization is balanced and maintains greater scrutiny for the projects that need it most, like constructing a new municipal water source which may be required to realize the vision for the Caledon Pit.

Great communities are founded on great infrastructure. Modernizing the environmental assessment process will help get infrastructure like roads, sewage and water systems built more quickly, by eliminating often duplicative requirements on lower-impact projects, while maintaining strong environmental oversight on the projects that need it most.

We thank you for the opportunity to provide comments and for your consideration. We would be pleased to discuss this submission further.

Yours truly,
DAVIES HOWE LLP



Alex Lusty (he/him)

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copy: Client