



May 9, 2023

Ministry of Environment, Conservation and Parks  
Environmental Assessment Modernization Branch  
Environmental Assessment and Permissions Division  
Attention: Annamaria Cross, Director  
Ministry of Environment, Conservation and Parks  
135 St. Clair Avenue West  
Toronto, ON M4V 1P5

Dear Ms. Cross:

**RE: Regional Public Works Commissioners of Ontario Response – ERO 019-6693 – Evaluating Municipal Class Environmental Assessment Requirements for infrastructure Projects**

The Regional Public Works Commissioners of Ontario (RPWCO) thanks the Ministry of Environment, Conservation and Parks (the Ministry) for consulting on Evaluating Municipal Class Environmental Assessment Requirements for Infrastructure Projects. RPWCO members provide critical municipal infrastructure to approximately 80 per cent of Ontario residents and businesses.

**Environmental assessment needs to be modernized to achieve provincial target of 1.5 million homes**

Infrastructure development processes have shifted significantly over the last 50 years, the environmental assessment process has remained largely unchanged. RPWCO member municipalities have experienced significant delays in large infrastructure projects under the current process.

Delays constrain delivery of servicing capacity to meet the needs of growing communities and significantly increase the cost of infrastructure projects. The Province's target of 1.5 million homes cannot be achieved without delivery of municipal infrastructure in a timely manner. The environmental assessment process needs to be modernized to support timely and effective infrastructure delivery.

**Rescind Municipal Class Environmental Assessment and focus on existing municipal processes**

Municipal infrastructure is already reviewed through existing provincial approval and the application process for regulatory permits and approvals. The RPWCO recommends the Municipal Class Environmental Assessment process be rescinded. Municipalities have a

Membership: City of Greater Sudbury, City of Guelph, City of Hamilton, City of London, City of Ottawa, City of Toronto City of Thunder Bay, City of Windsor, County of Chatham-Kent, County of Simcoe, District of Muskoka, Region of Durham, Region of Halton, Region of Niagara, Region of Peel, Region of Waterloo, Region of York

responsibility to protect the environment and the interests of their residents and are already bound by rigorous compliance approvals. Existing municipal processes have proven to be effective in infrastructure assessment and planning:

**1. Integrated system design through Municipal Infrastructure Master Plans**

RPWCO members complete robust Master Plans that identify infrastructure required and planned corridors. Public consultation at this stage is focused on the system as a whole and provides early and fulsome consultation opportunities regularly requested by Indigenous communities. Once the Master Plan is approved, infrastructure for the next 10 years would be pre-approved to proceed but still required to obtain proper compliance approvals.

**2. Addressing local needs and challenges when obtaining necessary compliance approvals for a Project**

Project stage is focused on aligning and mitigating environmental and social impacts of the project. Provincially specified Indigenous communities that are directly impacted by the project are engaged through the development of a Project Report. Project details are provided to the Ministry through the Project Report to initiate timely delivery of relevant compliance approvals.

The RPWCO also supports the proposed project list for comprehensive environmental assessments proposed under the companion proposal ERO 019-4219. Directing nearly all municipal projects to the existing municipal processes above strikes the right balance of risk assessment. Rescindment of Class EA should not result in any of these processes requiring a Comprehensive Environmental Assessment.

**Provide clarity and predictability through legislated timelines**

Predictability and certainty in obtaining approvals is key to effective and timely infrastructure delivery. To provide certainty, it is recommended that timelines to obtain provincial approvals be included in legislation. Once a Project Report is submitted, it is recommended the Ministry have a legislated requirement to issue any conditions within 35 days. Firm and predictable timelines provide proponents with the certainty required to enable timely delivery of municipal infrastructure and the best opportunity to discuss the system and the projects required as a whole with Indigenous communities, helping make the most of limited Indigenous staff resources.

**Continued municipal engagement is required to ensure municipal infrastructure requirements enable growth**

RPWCO members will provide most of the infrastructure required to service housing and required growth but need to be provided the tools to do so effectively and in a timely manner. Leveraging existing municipal processes and approvals is the best way to achieve this goal. Clarity will also be required for other stakeholders. Plain language

supporting materials will be needed to help the public, agencies, and Indigenous communities understand their opportunities to provide input.

The RPWCO requests the Ministry consider these comments when determining how to proceed with requirements for municipal infrastructure projects.

Should you have questions regarding the process or require further detail, please feel free to contact me at [Andrew.Farr@halton.ca](mailto:Andrew.Farr@halton.ca) or by phone at 905-825-6000, extension 6040.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrew Farr".

Andrew Farr, P.Eng.  
Chair, Regional Public Works Commissioners of Ontario

cc: Chris Traini, President, Municipal Engineers Association  
Dan Cozzi, Executive Director, Municipal Engineers Association  
Paul Knowles, MCEA Advisor, Municipal Engineers Association  
Craig Reid, Senior Policy Advisor, Association of Municipalities of Ontario  
Thomas Barakat, Manager, Public Policy & Government Relations, Ontario Good Roads Association  
Michele Grenier, Executive Director, Ontario Water Works Association