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Re: ERO 025-1140 - Proposed changes supporting the harmonization of municipal road construction standards as part of Bill 60 - Fighting Delays, Building Faster Act, 2025

Peel Region appreciates the opportunity to comment on proposed changes supporting the harmonization of road construction standards. Peel Region offers the following comments and recommendations.

PEEL REGION COMMENTS & RECOMMENDATIONS

Given that the characteristics of municipal local roads differ significantly from those of provincial highways, Peel Region feels it is important for municipalities to be able to implement their own standards. Peel Region uses OPS.MUNI standards for capital road projects, but sometimes applies stricter or unique standards. If new regulations limit Peel Region's ability to customize contracts or override its conditions, this could compromise quality control and reduce the longevity of Peel's assets.

For example, Peel Region has developed specific asphalt specifications to ensure that the quality of local and Regional Roads meets the required service life. While the Ontario Provincial Standard (OPS) asphalt specification is appropriate for 400-series highways, it does not necessarily guarantee the same durability or performance for local and Regional Roads. While asphalt specifications are one example, there are several other municipal standards which could be jeopardized under the proposed changes, potentially undermining the long-term safety, quality, and sustainability of local infrastructure.

Additionally, Peel Region recommends the use of materials in road construction that have low embodied carbon that lessens the total greenhouse gas emissions associated with the production, transportation, installation, maintenance, and disposal of construction materials throughout their lifecycle. Further, the use of green infrastructure such as bioswales, permeable pavements, and restored wetlands in road construction helps the infrastructure to be climate adaptable as well as in managing stormwater and reducing urban heat. The use of brighter additives, reflective aggregates, light-reflective surface coatings or lighter paving materials in road construction that reflect light can also help to reduce urban heat.

CONCLUSION

Peel Region appreciates the opportunity to provide input and looks forward to continued collaboration on advancing Ontario's road network and infrastructure. For further discussion, please contact miriam.polga@peelregion.ca.

Kind regards,

Miriam Polga

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