



February 2, 2025

EA Modernization Project Team
Environmental Assessment Modernization Branch
Ministry of the Environment, Conservation and Parks
135 St Clair Ave West, 4th Floor
Toronto, ON M4V 1P5

Re: ACEC-Ontario Response to ERO 019-7891 (New regulation to focus municipal environmental assessment requirements under *the Environmental Assessment Act* 1990).

On behalf of the Association of Consulting Engineering Companies-Ontario (ACEC-Ontario) and its more than 140 member firms that provide the professional expertise required to plan, design and deliver Ontario's critical infrastructure, we are pleased to comment on the new regulation to streamline environmental assessment requirements (ERO 019-0781).

Efficient and reliable planning and approval processes are essential for Ontario to deliver capital projects and meet its critical infrastructure needs on time and on budget. Given this context, ACEC-Ontario is broadly supportive of the province's ongoing efforts to streamline environmental assessment requirements. While we recognize the positive intent to replace the existing Municipal Class Environmental Assessment (MCEA) process with the proposed Municipal Project Assessment Process (MPAP), we would like to take this opportunity to highlight several questions and considerations for the province to contemplate.

Firstly, the municipal consultation process under MCEA is well-established. Our expectation is that municipalities will still need some level of a consultation process under the MPAP with agencies, property owners, Indigenous communities etc. as well as ensuring an appropriate level of environmental documentation. Removing the well-established, phased MCEA process in favour of municipalities building their own approach, especially for the preliminary phase prior to issuance of a draft report, could lead to inefficiencies. The following are comments we received from our members pertaining to this issue:

- Will municipalities be expected to undertake some level of transportation planning and consultation prior to Detail Design? Or will municipalities be able to independently initiate a road project in Detailed Design?
- Will municipalities still be required to undertake environmental impact assessments to satisfy federal and provincial environmental requirements?
- Will municipalities be required to engage with Indigenous communities if archaeological assessments are not required?
- Will municipalities need to demonstrate the need and justification for roadway improvements if the MCEA process no longer exists?
- Will municipalities need to review and evaluate alternative solutions if the MCEA process ceases to exist?
- Will municipalities need to undertake public meetings / public information sessions if the MCEA is replaced?



Secondly, we enjoy a productive working relationship with the Municipal Engineers Association (MEA), who have been heavily involved in the development of the MCEA. We noted from the MEA submission that they would be willing to assist in refining MPAP and its associated regulatory details. Accordingly, we respectfully ask the Ministry to strongly consider the MEA request that a series of workshop-style sessions be established with relevant industry experts and stakeholders, including ACEC-ON member representatives, to assist in the detailed fulfillment of the proposed MPAP. We would certainly participate if these sessions are established.

Thank you for the opportunity to comment. Should you have any questions regarding the points raised in our submission, please contact Andrew Hurd, ACEC-Ontario's Executive Director at ahurd@acecontario.ca.