

February 3, 2026

Environmental Assessment Modernization Branch
135 St Clair Ave West
4th Floor
Toronto, ON
M4V 1P5

Re: New regulation to focus municipal environmental assessment requirements

About Us

Good Roads is a municipal association concerned with the quality and design of roads in Ontario. We have been devoted to the cause of better roads since 1894. Originally known as the Ontario Good Roads Association (and still using that name corporately), our members include most of Ontario's municipalities and a growing number of First Nations as well as dozens of affiliated corporate members in the transportation and infrastructure sectors.

For more information, please visit www.GoodRoads.ca.

Comments

Good Roads appreciates the opportunity to comment on ERO 019-7891 regarding proposed changes to environmental assessment requirements for municipal infrastructure projects. Good Roads supports the Province's commitment to modernizing and streamlining the Municipal Class Environmental Assessment (MCEA) process. However, based on our review of the proposed Municipal Project Assessment Process (MPAP) and the new Archaeological Assessment Process (AAP), we are concerned that the proposal, as currently drafted, may not deliver the efficiencies previously announced. In several respects, the proposed framework risks adding new procedural layers, duplicative consultation requirements, and uncertainty that could delay project delivery rather than accelerate it.

Good Roads shares many of the concerns raised by the Municipal Engineers Association (MEA), particularly with respect to implementation, clarity, and resourcing impacts at the municipal level.

Municipal Project Assessment Process (MPAP)

The proposed MPAP introduces new requirements that appear more onerous than the existing MCEA framework, including mandatory preparation and circulation of a draft project report with a minimum 30-day comment period. It is unclear how the addition of this step aligns with the Province's stated goal of reducing delays for lower-impact municipal projects.

Good Roads

The shift away from the established MCEA model, where consultation occurs during the evaluation of alternatives, and toward a process where a defined project is presented for comment raises questions about transparency, flexibility, and risk management. Further explanation is required as to why the proposed MPAP diverges from the Transit Project Assessment Process (TPAP), which was previously cited as a model, and whether similar changes are contemplated for TPAP projects.

Good Roads believes that the Ministry should convene structured, workshop-style sessions with municipal practitioners and other stakeholders to test the MPAP using real-world project examples and to identify opportunities to reduce unnecessary process steps.

Archaeological Assessment Process (AAP)

Good Roads recognizes the importance of protecting archaeological resources and respecting Indigenous rights. However, the proposed AAP represents a significant escalation from the existing archaeological screening process under the MCEA.

Under the proposal, even projects with no archaeological potential would be subject to draft and final reporting requirements, mandatory circulation, multiple waiting periods, and formal Indigenous consultation. Municipal practitioners have consistently warned that this approach could overwhelm available archaeological and consultation capacity, particularly given the number of routine road and linear infrastructure projects undertaken annually across Ontario.

Without clear thresholds, exemptions, or streamlined pathways for low-risk projects, the AAP risks becoming unworkable in practice and could significantly delay critical municipal infrastructure needed to support housing and community growth.

Project Lists (Tables 1 and 2)

Good Roads is concerned that the project lists proposed for both the AAP and MPAP are overly broad and insufficiently precise. Many project descriptions risk capturing routine municipal works that have historically been addressed through Planning Act approvals, subdivision agreements, or the existing MCEA process which result in duplication rather than streamlining.

In particular, road projects, stormwater infrastructure, and servicing works within plans of subdivision must be clearly excluded to avoid regulatory overlap. The absence of explicit exemptions heightens the risk of inconsistent interpretation and unnecessary EA requirements.

Each project category should be carefully scrutinized, line by line, with municipal practitioners to ensure that wording is clear, thresholds are appropriate, and unintended applications are avoided.

Transition Provisions

Good Roads supports transition provisions that provide municipalities with flexibility and certainty. Projects that are already underway should be allowed to complete the existing MCEA process, while projects captured under the new framework should have the option to proceed under either regime where appropriate. Clear and practical transition rules are essential to avoid stranded or re-opened projects.

Private Sector Projects

Good Roads agrees that historic exemptions for private sector projects should generally be maintained unless there is a demonstrated policy rationale for change. Expanding EA requirements to private sector developments without clear evidence of an existing problem risks creating additional delays for housing and employment lands while increasing municipal administrative burden.

Path Forward

Good Roads encourages the Province to work collaboratively with municipal associations to refine the proposed framework before finalizing the regulation. We support the establishment of a technical working group and facilitated workshops to test the proposed processes against real-world projects and ensure the new regime delivers genuine, measurable improvements.

Municipalities share the Province's goal of delivering infrastructure faster while protecting the environment and respecting Indigenous rights. Achieving that goal will require a regulatory framework that is clear, proportionate, and workable on the ground.

We appreciate the opportunity to provide these comments and look forward to continued engagement.

Thank you for your consideration.