

Moving to a Project List Approach Under the Environmental Assessment Act

Good Roads thanks the Ministry of Environment, Conservation and Parks (MECP) for the opportunity to comment on this proposal. Our association is generally supportive of the proposed list of projects that would be subject to the comprehensive environmental assessment (EA) process. The main concern we hold is with those projects that will not be subject to it and instead be subject to a class EA process.

Good Roads understands that MECP will be meeting with class EA proponents to discuss amendments that will be required to class EAs to ensure there are no gaps or duplication. It is important that appropriate wording in class EAs be used to ensure there are no gaps or duplication. One such example Good Roads wishes to flag is the proposal that all new highways less than 75 km be subject to MTO's Class EA process even if the proponent is a municipality. In such a case, the Municipal Class Environmental Assessment (MCEA) process would not be acceptable.

The construction of new highways regularly includes new municipal roads to connect to the highway. Historically, EA approval for these new municipal roads has been deemed to be included with the EA approval for the highway. To ensure there is no confusion or duplication, the MCEA needs to include a clause in Appendix 1 that states, "*Construction of new roads that are associated with new highways and included in MTO's Class EA Schedule A process or a Comprehensive EA process.*" These new roads should also be designated as 'MCEA Schedule A (exempt)'. Furthermore, there should not be a requirement for an MCEA Schedule C process in addition to an MTO Class EA Schedule A or comprehensive EA process.

A similar issue arises when a municipality constructs a new road involving a new intersection or interchange on a provincial highway. There should not be a requirement for the MTO Class EA process in addition to the MCEA Schedule C process. MTO's Class EA should include a clause that states, "*Construction of highway improvements, intersections or interchanges associated with municipal road projects and included in an MCEA Schedule C process*" and designate these highway improvements as 'MTO Class EA Schedule C (exempt)'.

Lastly, it is important that MECP approves the Municipal Engineers Association's proposed amendments to the MCEA. While the changes in this consultation will help in the long-term, it is important to approve those amendments to ensure that the MCEA process continues to function properly until the major changes to the EA process are complete.