



TRANSPORTATION AND  
ENVIRONMENTAL SERVICES

Water Services

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May 9, 2023

EA Modernization Project Team  
Ministry of the Environment, Conservation and Parks  
135 St. Clair Avenue West, 4<sup>th</sup> Floor  
Toronto Ontario

**Re: Comments on “Evaluating municipal class environmental assessment requirements for infrastructure projects”: ERO 019-6693**

The Region is thankful for the opportunity to review and comment on the captioned consultation document and provides the following comments:

- The Region is supportive of any initiative to evaluate the requirements for municipal road, water and wastewater projects currently subject to the Municipal Class EA process. In doing so, the Region supports an outcome where there are procedures in place to continue to uphold the principles of protecting the environment, considering cultural heritage, and engaging public stakeholders and First Nations.
- The Municipal Class EA should not be revoked without further consultation of municipalities and concerned associations (ie: Municipal Engineers Association, OWWA, Ontario Good Roads Association, OPWA, to name a few). It is noted that the MEA is a defensible process followed by over 400 municipalities in the Province which demonstrates to the public that proper steps were taken in the planning and design phases of critical infrastructure like roads, water and wastewater projects. In addition, the project file report or ESR is the written record shared by all concerned on the project, allowing municipalities to demonstrate openness and transparency with its decision making.
- The Municipal Class EA is integrated with many Provincial legislation which by design may compliment, but not replace the other processed cited in ERO 019-6693, namely capital plans, asset management plans, Servicing master plans, each serving a specific function with defined scope.
- Further details on what is being considered should be provided for municipalities to review and comment before the Province makes a decision.

In summary, the Region appreciates the opportunity to comment on and supports the evaluation of the Municipal Class EA process. However, the Region feels it is premature to revoke the process at this time without details and further consultation on the changes to the process.

Yours truly,

A handwritten signature in black ink, appearing to read "Mari MacNeil". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Mari MacNeil  
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