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By E-mail & Post

July 30<sup>th</sup>, 2018

**The Honourable Rod Phillips**

Minister of the Environment, Conservation and Parks  
77 Wellesley Street West  
11 Floor, Ferguson Block  
Toronto, Ontario,  
M7A 2T5

Dear **Minister Phillips**:

**Subject: Municipal Class Environmental Assessment - Process Review**

Sincere congratulations on your appointment as our new Minister of Environment, Conservation and Parks. The many members of the Municipal Engineers Association (MEA) would like to take this opportunity to explain the importance of the Municipal Class Environmental Assessment (MCEA) process. The MCEA process is a legislated mandatory process that must be followed by *every* municipality in Ontario to construct and maintain billions of dollars of vital infrastructure – however, urgent improvements are required. Vital infrastructure projects are being delayed or saddled with unnecessary costs because of the current MCEA process.

The Municipal Engineers Association (MEA), together with other organizations such as Residential Civil Construction Alliance of Ontario (RCCAO) and Ontario Good Roads Association (OGRA), have been advocating change to the MCEA process for several years. The Auditor General's 'Value for Money' report in December 2016 identified a number of serious problems with the EA processes that need to be addressed. In April 2017, your predecessor actually acknowledged the need for reforms to the MCEA process when he approved the MEA/RCCAO joint Environmental Bill of Rights (EBR) application for a complete review of the MCEA process. However, work on this review was slow to begin and achieving the December 2018 deadline will be a challenge. We have two urgent requests:

**Priority for the MCEA Review Process**

Since early in 2018, we have been meeting with your Ministry team lead by your staff. Extensive stakeholder consultation with proponents has been completed and we are confident that we can work together to develop an improved MCEA process that will

benefit all. We ask that you assign priority to the completion of this review and then to the implementation of the resulting improvements.

### **Delegate Part II Order Request (PIOR) Decisions**

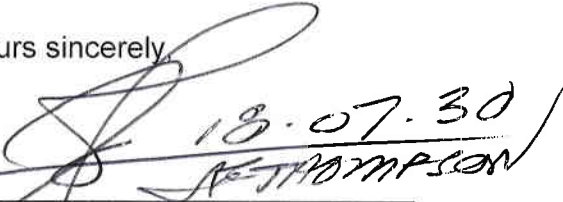
A request for a Part II Order is the public's appeal mechanism to the MCEA process. In recent years, the Ministry's process for your internal review of these requests/appeals has become unwieldy and time consuming, often delaying important municipal infrastructure projects for 12 – 24 months beyond the regular MCEA process. There is wide spread support for improving this process and, in February 2018, your predecessor did finally announce there would be some improvements – the decisions for certain PIORs would be delegated to your Director and there would be service standards established. However, this is not enough.

The Auditor General highlighted one of the most significant problems with the PIOR process – sign off by the Minister - added, on average, an additional 110 days onto the PIOR process and this "post-Director review did not substantively change the outcome of the review".

Municipal governments consist of duly elected representatives responsible to their residents. Provincial Ministers should not become embroiled in local issues related to the approval of municipal infrastructure. On behalf of the numerous municipalities that have supported MCEA process reform, we ask that you immediately announce that all decisions for PIORs on MCEA projects are delegated to your Director. This one announcement will greatly improve the PIOR process and signal your serious support for EA reform.

We would be pleased to discuss these requests with you at your convenience. We look forward to your serious consideration and prompt action to effect these necessary process improvements.

Yours sincerely,

  
18-07-30  
J. THOMPSON  
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John Thompson, P. Eng., CMM IP III, PMP  
President  
Municipal Engineers Association

cc: Chris Traini, President, OGRA  
Andy Manahan, Executive Director, RCCAO  
Paul Knowles, Chair, MCEA Monitoring Committee, MEA

**Municipal Engineers Association**