



June 10, 2020

Hon. Natalia Kusendova
Chair
Standing Committee on Social Policy
99 Wellesley Street West
Room 1405, Whitney Block
Queen's Park
Toronto, ON M7A 1A2

RE: Bill 171, *An Act to enact the Building Transit Faster Act, 2020* and make related amendments to other Acts

The Residential and Civil Construction Alliance of Ontario (RCCAO) is pleased to provide comments to the Committee regarding Bill 171, *An Act to Enact the Building Transit Faster Act, 2020*.

RCCAO is an alliance of key labour and management stakeholders derived from the residential and civil construction sectors. The Alliance was formed to address the challenges affecting the delivery of projects, such as the Municipal Class Environmental Assessment (MCEA) process. We work together with government and industry experts to offer realistic solutions to problems in the areas of infrastructure delivery, growth planning, regulatory reform and labour shortages.

A primary RCCAO focus since our inception has been the importance of investing in public infrastructure – from transit and waterworks to roads and bridges – and doing so smartly and efficiently for taxpayers and daily users of infrastructure. These principles are even more important in the current COVID-19 landscape. RCCAO's economic modelling [report](#) confirms that smart infrastructure investments are only fully realized over the long-term. For this reason, investing in new infrastructure should be seen as a consistent, ongoing journey along a path to ensuring conditions are in place for sustained economic recovery and growth.

Research has demonstrated that the impact of infrastructure spending on job creation is significant. For every \$1 billion in infrastructure spending, 16,700 new jobs are generated each year. Increased investment in infrastructure also spreads throughout the economy via a series of multiplier effects. For every \$1 billion in infrastructure spending, GDP is boosted by \$1.14 billion. Investment in public infrastructure results in lower business costs and higher labour productivity.

RCCAO is pleased by the government's focus on transit and transportation infrastructure in Ontario. Based on strong evidence, one of the top priorities for RCCAO is building the *Ontario Line*. When complete this project will provide positive impacts for the region and enable a growing number of commuters to take transit from the suburbs into the downtown area while avoiding the critical and over-capacity Yonge and Bloor station. With the recent issuing of the RFQ, we trust that this project will be expedited and be built to suitable subway capacity.

We commend the Government of Ontario for its commitment to transit infrastructure and for introducing measures through Bill 171, including streamlining environmental assessments and working with utility companies to improve coordination for locates, to expedite construction of priority



transit projects. Several of the changes proposed in Bill 171, as well as the Proposed Ontario Line Project Regulation and the Proposed Amendments to Ontario Regulation 231/08, are not only positive, but should be considered for many other municipal infrastructure construction projects.

In March 2020, RCCAO provided [comprehensive technical feedback](#) to the Province regarding its proposed changes to the *Environmental Assessment Act* and new regulations as they pertain to the EA process for transit and other municipal projects. We believe that the proposed changes are necessary as under the current MCEA process, rebuilding aging structures or constructing new infrastructure is taking too long, especially when Ontario municipalities must ensure that their public works are more resilient to withstand severe weather events. Our research has consistently shown that local governments and, by extension, taxpayers are paying too much to modernize infrastructure systems.

Since 2009, when the first RCCAO report on MCEAs was published, our research illustrates that the MCEA process is too-time consuming and expensive relative to the outcomes. In 2010, [our report](#) found that it took about 19 months on average to go through the process with an estimated cost of \$113,300 per project paid by municipalities. [A follow-up study](#) in 2014 showed that it took almost 27 months for a similar set of projects, with an average study cost of \$386,500.

Our 2019 report, [“Case Studies That Support Reforming Ontario’s Municipal Class Environmental Assessment Process”](#), highlighted the high costs for specific municipal infrastructure projects, which ranged between \$46,000 and \$8.5 million. In the “Case Studies” report, which profiled 12 recent municipal projects that faced a cumbersome MCEA process, ten of these projects took between two and five years to go through the process. In one of the projects, in the City of Peterborough, the MCEA study cost would have been \$8.5 million, but Council found the cost too high to proceed.

RCCAO supports most of the proposed changes in the two regulations to expedite the assessment, planning and construction of the four specified transit infrastructure projects. There are several elements of the proposed regulations, including Exemption from Part II Order Requests, that should apply not only to other transit projects but to a broad array of MCEA municipal infrastructure projects. It is imperative that the government continues to find ways to streamline the MCEA process. There is a lot of overlap in consultation processes between the Planning Act and the MCEA requirements. Furthermore, municipalities are already addressing environmental issues in Official Planning and other processes, so there is unnecessary duplication of effort.

RCCAO also strongly supports the Government of Ontario for making efforts to better address underground utilities in the delivery of major transit projects. The lack of timely locates can postpone the reopening of roads or the completion of vital infrastructure projects. Unfortunately, enforcement and compliance of the *One Call Act* and the other relevant laws is inconsistent. Further, Ontario One Call has not been enforcing the five-day turnaround time – this is something the government should focus on. Construction contractors still face long delays in waiting for all utilities to provide complete and reliably accurate locate information.

The delays are compounded by the fact that all utility locates have a relatively short validity period, and once expired a request must be resubmitted. If all utilities do not respond within a set period,

construction contractors cannot commence any excavation and must contend with starting from scratch with a fresh set of locate requests. Not only can this result in downtime costs of \$10,000 or more per day per crew, it can trigger delay penalties against the contractor by the municipality or other owner.

We appreciate the opportunity to provide comments to the Standing Committee and look forward to continuing our engagement with the Government of Ontario as it works to address the infrastructure needs of the province.

Sincerely,



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Executive Director



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