

February 9, 2007



The Honourable Dalton McGuinty
Premier of Ontario
Legislative Building
Queen's Park
Toronto ON M7A 1A1

Dear Premier McGuinty,

We are writing to you today to indicate support for the principles of the legislative changes outlined in the Province of Ontario's Environmental Bill of Rights (EBR) posting # AF07E0001 *Proposal - Potential Components for legislative Brownfield Reform*.

The organizations participating in this joint submission commend the Government of Ontario on their initiative to prepare this Legislative Brownfield Reform Proposal and to identify the potential components of a reform package.

We are pleased that the proposed legislative recommendations have focused on "closing the gap" on environmental liability and have addressed a number of key issues related to regulatory, civil, and mine rehabilitation liability, and the Record of Site Condition framework.

Based on the information provided in the EBR posting and the recent Brownfields Stakeholder Group Meeting (January 22, 2007), it is anticipated that the proposed legislative recommendations would have beneficial implications to Brownfield redevelopment. In addition, it would create better alignment amongst the key stakeholders involved in the Brownfield process including polluting owners, non-polluting owners and the municipalities. The revised legislation would provide the framework to assist in clarifying many technical expectations amongst Brownfield practitioners and regulators. It would also assist the Government of Ontario in achieving their environmental and economic objectives to build sustainable communities.

It is believed that by strengthening regulatory and civil liability protections and streamlining the municipal redevelopment process, a greater number of idle Brownfield sites will reach the marketplace. These proposed legislative recommendations are complemented by recent revisions to the Planning Act, specifically municipal approval of Community Improvement Plans (CIPs) and flexibility in financial tools such as Tax Increment Financing (TIFs).

It is noted that the proposed legislative changes identified in the EBR posting do not respond to all barriers that have been identified by stakeholders but the group supports the intent and direction of the legislative changes proposed at this time. Several of the participating organizations will provide separate submissions with detailed comments to assist provincial government staff to refine the legislative recommendations to facilitate the government's objectives and further advance adaptive reuse of brownfield sites.

We appreciate the Province's efforts through the Ministries of Municipal Affairs and Housing, the Environment, Northern Development and Mines, and the Attorney General to consult with the public on these potential legislative changes and look forward to working through the process of defining the specific legislative changes and related regulatory and process details.

We urge the government to ensure that this matter is placed on the legislative agenda and earmarked for passage in the spring session.

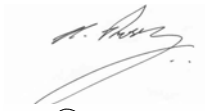
Thank you for your serious and immediate consideration of our comments.

Sincerely,



Association of Municipalities of Ontario (AMO)

Doug Reycraft, President



Canadian Brownfields Network (CBN)

Angus Ross, Chair



Canadian Environmental Auditing Association (CEAA)

Don Fraser, Executive Director (Registrar)



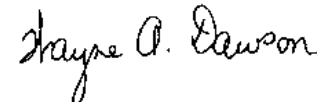
Canadian Petroleum Products Institute (CPPI)

Faith Goodman, Vice-President, Ontario Division



Canadian Urban Institute (CUI)

Glenn Miller, Director, Education & Research



Cement Association of Canada

Wayne Dawson, Vice President- Ontario Region



Council of Ontario Construction Associations (COCA)

David Frame, President



Greater Toronto Homebuilders Association-Urban Development Institute (GTHBA-UDI)

Neil Rodgers, Vice-President, Policy & Government Relations



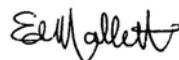
National Brownfields Association (NBA), Ontario Chapter

Ted Salci, President, Ontario Chapter and Mayor, City of Niagara Falls



Ontario Bar Association – Environmental Law Section (OBA-ELS)

Marc McAree, Chair



Ontario Centre for Environmental Technology Advancement (OCETA)

Ed Mallett, President and CEO



Ontario Environment Industry Association (ONEIA)
Alex Gill, Executive Director



Ontario Home Builders Association (OHBA)
Brian Johnston, President



Ontario Professional Planners Institute (OPPI)
Gregory Daly, Chair, Policy Development Committee



Seneca College
Bill Humber, Chair, Centre for the Built Environment



Toronto Economic Development Corporation
Jeffrey D. Steiner, President and CEO

c.c.

The Honourable Greg Sorbara, Minister of Finance

The Honourable David Caplan, Minister of Public Infrastructure Renewal

The Honourable Sandra Pupatello, Minister of Economic Development and Trade

The Honourable Laurel Broten, Minister of the Environment

The Honourable Dwight Duncan, Minister of Energy

The Honourable Leona Dombrowsky, Minister of Agriculture, Food, and Rural Affairs

The Honourable Madeleine Meilleur, Minister of Community and Social Services

The Honourable John Gerretsen, Minister of Municipal Affairs and Housing

The Honourable David Ramsay, Minister of Natural Resources

The Honourable Rick Bartolucci, Minister of Northern Development and Mines

The Honourable Donna Cansfield, Minister of Transportation

The Honourable Harinder Takhar, Minister of Small Business & Entrepreneurship

The Honourable Michael Bryant, Attorney General of Ontario

Peter Wilkinson, Chief of Staff to the Premier