



SENT BY EMAIL: Joshua.McCann@ontario.ca

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Mr. Joshua McCann
Inter-Governmental Policy Branch
Infrastructure Policy Division
Ministry of Economic Development, Employment and Infrastructure
900 Bay Street , 5th floor, Mowat Block
Toronto ON M7A 1C2

Subject: Asset Management Ontario's Response to the Draft Municipal Asset Management Planning Regulation (EBR Registry Number: 013-0551)

Dear Joshua:

Asset Management Ontario (AMONTario) supports greater consistency of practice, improved outcomes, and increased accountability for municipal infrastructure asset management in Ontario. The draft regulation moves municipal infrastructure asset management towards these ends although this response highlights several areas for further consideration.

AMONTario is uniquely positioned in that its membership is comprised of practitioners from across disciplines and professions (engineering, financial, strategic planning, etc.) and driven by municipalities as a leading community of practice.

AMONTario recognizes the multi-faceted challenges of building capacity in infrastructure asset management across Ontario. These include: varying capacities and governance structures to address asset management challenges and the need to identify metrics that can standardize and benchmark meaningful progress without burdening municipalities with excessive reporting. Part of the nuance in addressing these challenges is that effective asset management is inter-disciplinary; organizational cultures across municipalities also vary to the extent that they integrate technical and strategic expertise across disciplines.

1. **Municipal asset management capacity building in Ontario could be strengthened with further recognition of municipalities' limited capacity to do asset management effectively.**

The draft regulation stipulates different requirements for municipalities with populations over or under 25,000. To make the implementation of the regulation more effective, AMONTario encourages the Ministry to refine this categorization. Population is an imperfect proxy for a municipality's capacity and resources, but one way that this approach could be improved would be for the Ministry to establish reporting requirements for municipalities with populations less than 10,000; another for municipalities with populations between 10,001 and 75,000; and a third for municipalities with populations greater than 75,000.

These ranges are estimates. The Ministry should use evidence-based data and analysis to determine the appropriate population thresholds. The 25,000 threshold to demarcate 'smaller municipalities' smooths over capacity differences that, in practice, can be too great.

2. **The Ministry should consider amending its approval requirements for asset management plans.**

The requirement that asset management plans be signed by licensed engineering practitioners does not support the multi-disciplinary nature of asset management. As an alternative, AMONTario recommends that asset management plans be approved by the Senior Leadership Team of a municipality and then endorsed by Council.

A 'Senior Leadership Team' requirement would elevate the importance of asset management within municipalities and facilitate greater cross-disciplinary collaboration.

3. **A Proposed Levels of Service framework should be prescribed in regulation. However, greater flexibility is required for municipalities to determine the most appropriate metrics to represent their services provided.**

Municipalities should report on the prescribed metrics as listed in the Proposed Levels of Service framework. However, municipalities that can demonstrate more robust metrics for asset categories should be allowed to substitute those. This would allow municipalities to tailor performance measurement to higher standards, facilitate continuous improvement (as per Results-based Accountability), and avoid reporting outputs that could appear misleading. This would also recognize that the appropriate metrics can change as municipalities' level of asset management maturity improves.

Since the development of public sector focused asset management resources such as InfraGuide; the Leaders in Asset Management Program; the Ministry's *Building*

Together: Guide for Municipal Asset Management Plans (2012); and the passage of the *Infrastructure for Jobs and Prosperity Act (2015)*, the industry has progressed tremendously.

Asset Management Ontario is committed to helping municipalities address their capacity and planning gaps. Over the next four years and three phases of asset management planning requirements, increased collaboration with the Ministry will be necessary to boost asset management capacity. AMONTario is committed to collaborating with the Province, our member municipalities, and other organizations such as MFOA, AMO, OGRA, and AMCTO to realize the draft regulation's goals.

Thank you for the opportunity to comment and for involving Asset Management Ontario in the Ministry's consultation process.

Sincerely,

A handwritten signature in black ink, appearing to read "Curtis Ching". The signature is fluid and cursive, with a large loop at the end.

Curtis Ching
Chair, Asset Management Ontario
curtisching@amontario.ca

c. Maureen Johnson - Manager, Municipal Policy Infrastructure Unit