



Greater Ottawa Home Builders' Association
Association des constructeurs d'habitations d'Ottawa

#108 – 30 Concourse Gate, Nepean, ON K2E 7V7
Tel: (613)723-2926 Fax: (613)723-2982

December 18, 2025

Ministry of the Environment, Conservation and Parks
Conservation and Source Protection Branch
300 Water Street North tower, 5th floor
Peterborough, ON K9J 3C7

Re: ERO 025-1257 Proposed boundaries for the regional consolidation of Ontario's conservation authorities

Please accept the below from the Greater Ottawa Home Builders' Association (GOHBA) and its members as a submission to the government's request for feedback on 'Proposed boundaries for the regional consolidation of Ontario's conservation authorities' (ERO 025-1257).

Our comments follow on and complement points in our previous submissions on:

- ERO# 019-2927 - Proposed updates to the regulation of development for the protection of people and property from natural hazards in Ontario;
- ERO #019-6141 - Legislative and regulatory proposals affecting conservation authorities;
- ERO #019-6160 - Proposed Updates to the Ontario Wetland Evaluation System; and,
- ERO #019-6161 - Conserving Ontario's Natural Heritage.

GOHBA has been the proud voice for the Ottawa home building community since 1951. Our 440+ members include builders, developers, professional renovators, trade contractors, suppliers and manufacturers serving the residential construction and professional renovation industry.

Our comments are complementary to and in concert with those of the Ontario Home Builders' Association as the provincial voice of the residential construction industry.

Specific Comments

GOHBA has strongly supported the provincial government's efforts to clarify roles and responsibilities of Conservation Authorities (CAs) in order to streamline the approvals process to support the building of more homes faster.

In previous submissions GOHBA also supported the establishment of province-wide rules and regulations to provide consistency between different CAs subject to geographic specific contexts also being considered.

Previously we have recommended that the province consider re-organizing some CAs to ensure that adequate resources are available to deliver core programs. Recognition of regional context and natural features is critical to appropriate decision-making.

Our industry supports a continued role for watershed-based planning to protect people and property from hazards and flooding. Consolidation between some CAs and watersheds will create administrative efficiencies and allow for consolidation of staffing resources while supporting retaining appropriate technical experts that may not have realistically been possible with some smaller CAs.

Ottawa is currently divided into three different CAs: Rideau Valley, Mississippi Valley and South Nation River. It is not appropriate that a home builder in Ottawa may have to deal with different CAs depending on which part of the City or CMA it was building in, and larger operations are dealing with all three CAs separately for their individual projects.

GOHBA members continue to be frustrated by inconsistent interpretation and application of policies between different CAs.

Consolidation will help provide much needed consistency and predictability in:

- handling of files
- streamlining the approvals process for home builders working in multiple jurisdictions
- expediting service delivery review timelines
- encouraging internal efficiencies
- application of a net benefit approach to environmental protection.
- formal and informal compensation methods
- implementation of natural heritage policies
- policies and approaches for offsetting while accounting for specific geographic conditions

Additional Considerations

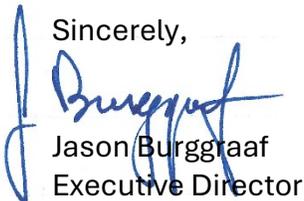
We wish to also take this opportunity to register a number of issues with local CAs that our members are dealing with. While more on the technical side they remain relevant, particularly as we move toward consolidation:

- Application Reviews:
 - CA participation in development application pre-consultation would be beneficial, to determine requirements for deliverables and strategy, to save time addressing new requests sent to developers in the form of comments related to the 1st development application submission.

- If information in the development application is unclear or missing, CAs should reach out to the applicant, rather than request clarification in the formal comments. This could reduce the number of application re-submissions, by allowing for simple clarifications to be submitted during review.
- CA development application review comments should be coordinated internally and with other agencies, to reduce/eliminate contradictory comments.
- Water budget / balance:
 - Guidelines specific to the assessment and determination of the pre-development water budget and establishing post development water budget targets are needed.
- Flood risk management / floodplain mapping:
 - CAs generally accept 1D modeling, but not 2D modelling. It is understood that this may be a result of a shortage of internal CA expertise with 2D modelling. A strategy to accommodate the adoption of 2D modelling is needed.
 - Flood risk management should NOT be connected to the review of ecological systems.
- Municipal Drains
 - Somewhat related but a significant issue locally with development applications is Ottawa's reliance on municipal drains. Ottawa has the second highest number of municipal drains. The municipal drain process has become the critical path for most projects brought into the urban boundary or those without a legal outlet. As a result, this process is delaying the delivery of several thousand housing units to the market.

We thank the Ministry for the opportunity to comment on this proposal. We are pleased to answer questions or provide further information as requested.

Sincerely,



Jason Burggraaf
Executive Director