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December 17, 2025

The Honourable Todd McCarthy
Ministry of the Environment, Conservation and Parks
777 Bay Street, 5th Floor
Toronto, Ontario
M7A 2J3

Dear Minister McCarthy,

Re: Proposed Boundaries for the Regional Consolidation of Ontario's Conservation Authorities (ERO #025-1257)

On behalf of Tercot Communities, we write to express our support for the proposed consolidation of Ontario's 36 Conservation Authorities (CAs). While CAs play an essential role in watershed management and natural hazard protection, under the current system, CA policies, technical capacity, and review timelines can vary considerably from one jurisdiction to another. This variability creates significant uncertainty for developers, landowners and municipalities alike, even when dealing with similar proposals.

By shifting to a more regional structure, the consolidation presents an opportunity to meaningfully enhance consistency, efficiency and predictability in the development review and permitting processes. It would help standardize regulations across broader geographic areas, mitigating the inconsistencies applicants encounter between different CAs. A consolidated structure would also enable more effective allocation of staffing and technical resources, reducing duplication and improving access to specialized expertise across the province. This is particularly beneficial for smaller or under-resourced municipalities that depend on CAs for technically sound application reviews.

In addition, the consolidation would complement the province's recent legislative efforts to streamline the development approvals process. In 2022, amendments to the CA Act were adopted to limit CA jurisdiction to flooding and erosion hazards and to eliminate duplicative permitting requirements for developments already approved under the Planning Act. While the statute created an exemption from CA permits in these circumstances, the exemption was made conditional on municipalities being prescribed by regulation - a step that has not yet been taken. As a result, landowners are often required to undergo what is effectively a secondary approvals process to obtain a CA permit, even where municipal planning approvals have already been granted, leading to unnecessary costs and delays. Given the proposed restructuring of CA boundaries and governance, consolidation presents an opportunity for the province to fully implement the intent of the 2022 amendments by enacting the necessary regulations to prescribe municipalities where CA permits are no longer required for developments approved under the Planning Act.

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Ultimately, the consolidation represents an important step toward modernizing Ontario's watershed management framework in a manner that aligns with broader provincial objectives, including increasing housing supply, infrastructure delivery and the development of complete communities. By supporting a more consistent and standardized regulatory framework, consolidation can help ensure that environmental protection is achieved while supporting responsible and coordinated growth. We look forward to seeing the implementation of these changes and the benefits they will bring.

Sincerely,

Filipe M. Dias

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CC: Paula Tenuta, Chief Advocacy Officer, BILD