

Public Input Coordinator

Conservation and Source Protection Branch
Ministry of the Environment, Conservation and Parks
300 Water Street North tower, 5th Floor
Peterborough, ON
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Re: ERO #025-1257 – Proposed boundaries for the regional consolidation of Ontario's conservation authorities

We, the Save the Oak Ridges Moraine (STORM) Coalition, are writing to express our opposition to ERO #025-1257. We are a grassroots charity that has worked for over 25 years to conserve the Moraine. As an appointee on the Oak Ridges Moraine Technical Working Committee that produced the first comprehensive long-term strategy for the Moraine and a member of the ORM Advisory Panel whose recommendations were vital in contributing to the Moraine's overall protection in 2001, our history of advocating for and protecting the Moraine as well as our knowledge of and experience with its unique hydrological and ecological features is longstanding and informed by decades of direct involvement. As a signee on Ontario Nature's letter on this proposal, written by Tony Morris, Conservation Policy and Campaigns Director, we echo the points that have already been made. We also wish to raise a number of points specific to the Moraine.

Under ERO #025-1257, coverage by nine conservation authorities would be reduced to just four across the Moraine, threatening to lose deep local knowledge and protection, strong community accountability, and policies tailored to the specific ecological and social conditions of each sub-watershed spanning the Moraine. This is particularly important for the Moraine for three core reasons.

1. Unique and rare habitats require local knowledge

The Oak Ridges Moraine contains ecosystems and species that are rare or provincially significant compared to many of its neighbouring regions. Forests, wetlands, meadows, and headwater streams along its length support biodiversity that cannot be protected effectively through a one-size-fits-most approach. Reducing conservation authority coverage risks weakening the locally tailored stewardship and monitoring programs that have maintained the most sensitive habitats for the most at risk species on the Moraine for decades.

2. Hydrological function varies across the Moraine

The Moraine's role as a hydrological feature varies along its length. Different sections recharge aquifers, feed distinct river systems, or regulate local flood and groundwater levels in ways that require location-specific knowledge. Consolidation under fewer authorities would likely undermine the detailed understanding needed to protect drinking water sources, maintain streamflow, and safeguard wetlands that are critical to both human and ecological communities.

3. Diverse communities with differing needs dot the landscape of the Moraine

Communities along the Moraine, perhaps unlike anywhere else in Ontario due to its location and protection, differ greatly in population density, development pressures, and cultural and recreational priorities. Each area covered by the current nine conservation authorities has unique social and environmental dynamics, and residents of the Moraine rely on their relevant conservation authority for locally tailored guidance, programming, and engagement. Reducing the number of authorities could sever these connections and reduce the capacity to respond to the specific needs of each community.

Thirty six conservation authorities tailored to the local needs of nature, wildlife, and people should not be viewed as a redundancy, but instead, as a strength unique to conservation in Ontario. As has been pointed out by numerous other parties, many conservation authorities are already quite efficient, likely much more efficient than a handful of mega-authorities spanning too geographically large of a region could be, as they allow effective programming, support, and protection to be delivered in ways that reflect local ecology, hydrology, and community needs. Issues with “differing policies, standards, fees and levels of staffing and technical capabilities” can and should be rectified by different means, like providing provincial templates or minimum standards, providing funding for technical enhancements, and more.

On a final note, we wish to highlight a particularly concerning point made by Ontario Nature. The amalgamation proposal has proceeded without adequate transparency, as the relevant ERO posting fails to disclose the legislative changes in Bill 68 that would enable it, effectively denying the public a meaningful opportunity to participate as intended under the Environmental Bill of Rights.

For the above reasons, we urge the province to heed the expertise of the many and varied organizations calling for an immediate halt to the proposed amalgamation of our conservation authorities. Instead of consolidation, the government should pursue measures that protect Ontario’s natural places and the communities that depend on them at the local level, consistent with the system’s original purpose.

Sincerely,

Save the Oak Ridges Moraine (STORM) Coalition