



Bruce Trail CONSERVANCY

Bruce Trail Conservancy Comments on ERO# 025-1257 – Proposed Boundaries for the Regional Consolidation of Ontario’s Conservation Authorities

The Bruce Trail Conservancy (BTC) welcomes the opportunity to comment on the province’s proposal to amend the boundaries and consolidate the governance of Ontario’s conservation authorities. The Niagara Escarpment and its associated watersheds form the ecological foundation of the Bruce Trail and the lands the BTC stewards and protects.

At present, the Bruce Trail crosses **seven conservation authority watershed boundaries** containing **45 conservation areas**. Any changes to watershed governance, hazard management and conservation planning will therefore have a direct impact on trail continuity and trail management, ecological restoration, land securement, community partnerships, and long-term conservation outcomes. In this context, we value the longstanding relationship BTC has maintained with the province and are grateful for the opportunity to provide input on these important matters.

The proposal, together with the information included in the supplemental documentation provided in the consultation’s posting indicates a desire to transition toward larger, regionally amalgamated conservation authorities. This approach is intended to enhance efficiency by reducing administrative burden and complexity, reducing red tape, while also streamlining permitting processes.

However, what remains unclear based on the current information available is how this restructuring may affect many of the existing agreements, operational relationships, and coordinated management approaches BTC has developed in tandem with respective conservation authorities to enable the routing and maintenance of the Bruce Trail across various conservation authority lands.

As BTC is recognized as the longest and oldest marked footpath in Ontario and Canada at large, ensuring continuity of these long-standing arrangements is essential to maintaining the Trail’s natural heritage and integrity. BTC also recognizes this to be vital in assuring the Bruce Trail continues to fulfil its provincially recognized role within the Niagara Escarpment landscape. The points below reflect some considerations as the province undergoes this major transition.



Bruce Trail CONSERVANCY

1. Alignment with the Niagara Escarpment Plan and the mandate for permanence of the Bruce Trail

The Niagara Escarpment Plan (NEP) and the Niagara Escarpment Parks and Open Space System (NEPOSS) together establish a coherent framework for protecting the ecological integrity of the Escarpment and ensuring the long-term continuity of the Bruce Trail. These instruments articulate a clear provincial commitment to maintaining “the permanence of a continuous public footpath” along the Escarpment, supported by coordinated land management across jurisdictions. We would ask that conservation authority boundaries reinforce the integrated governance approach that NEP and NEPOSS depend upon. Because the Bruce Trail crosses seven conservation authority watersheds, continuity of mandate, land access, stewardship, and hazard management is essential to fulfilling the legislated vision for a permanent, connected footpath. The BTC therefore emphasizes that boundary realignment should only proceed in ways that maintain full alignment with the Niagara Escarpment Plan, uphold the intent of NEPOSS, and protect the permanence of the Bruce Trail as a provincially recognized objective.

2. Ensuring Watershed-integrity can remain a top priority

The province’s supplemental document proposes boundaries that consolidate multiple distinct watersheds and subwatersheds into large regional units. From BTC’s review of the document, we understand that hydrologic systems influenced boundary decision where feasible, while also recognizing the need to balance watershed considerations with broader administrative efficiency and coordination.

From an implementation perspective, we believe this approach may present some challenges including the increased likelihood that natural watershed boundaries could become fragmented across larger administrative areas if not prioritized.

Following the undergoing of these changes, we therefore would strongly encourage that any following changes work to ensure subwatersheds that influence the escarpment continue to remain prioritized within broader regional decision-making structures. We also would advise that as hazard management programs become more generalized, there is greater efforts to ensure responsiveness to site-specific watershed behaviour as lack thereof would result in a significant risk to the integrity of many watersheds across the province.

As BTC’s conservation work is fundamentally tied to protecting connected ecological systems along the Escarpment, we would be happy to consult further on this specific topic as we acknowledge that any governance model that weakens the primacy of watershed science would undermine this mission.



3. Ensuring BTC and the province can work together to protect the Niagara Escarpment

It is our understanding that future governance models are still undefined, and we are unclear on how representation will be structured or how the voices of smaller municipalities will be weighted in an amalgamated authority.

Under the current framework, municipalities fund a significant proportion of conservation authority programs, and local priorities are currently reflected through accountable, watershed-based boards. As governance structures evolve, it will be important to ensure that communities most affected by natural hazards, land-use pressures, and ecological change continue to have a meaningful role in decision making.

For the BTC, strong localized decision-making is essential to trail planning, land securement, stewardship, and partnerships that depend on deep knowledge of local landscapes and community conditions. The BTC would welcome the opportunity to participate as a stakeholder in future discussions to help inform governance models that support both provincial objectives and the long-term protection and management of the Niagara Escarpment.

4. Transition costs, operational impacts, and implementation risks are not defined

The BTC is interested in learning more with respect to the costs associated with the merging of land holdings, IT systems, visitor services, staff structures, or asset management systems. We are also interested to learn how existing programs such as monitoring, restoration, education, and hazard management will be maintained during the transition.

There is some concern that the continuity of the Bruce Trail itself could be affected if existing agreements were to lapse, require re-approval, or become misaligned with the priorities of a newly consolidated authority. Such outcomes could introduce avoidable risk to a recreational and conservation corridor of national, provincial and regional significance.

As we believe that a consolidation of this magnitude is extremely complex and expensive, the BTC is committed to working collaboratively with the province and relevant authorities to ensure the landholdings, existing agreements, monitoring programs and partnerships that the BTC relies on are not affected by governance uncertainty and resource diversion during a period of desired restructuring.

5. More targeted, low-disruption alternatives exist

We believe there are examples of improvements that could be made within the current framework, including modernizing permitting systems and IT infrastructure, developing



Bruce Trail CONSERVANCY

consistent provincial standards and performance benchmarks, supporting shared services between neighbouring authorities, improving provincial financial support for watershed science, hazard programs, and land management, and enhancing provincial data systems and inter-agency coordination.

BTC supports these measures as viable, evidence-based improvements that do not jeopardize watershed integrity or local governance.

Conclusion

The BTC supports the province's efforts to strengthen watershed management, improve efficiency, and ensure consistent, science-based decision-making across Ontario. Based on the information that has been provided we would welcome further consultation to ensure the continuity, free public access, and long-term vision of the Bruce Trail conservation corridor will remain maintained and will not be interrupted.

As the creators and caretakers of Canada's oldest and longest marked footpath, which is a widely cherished, free public recreational resource enjoyed by more than one million people annually, the BTC would welcome the opportunity to be included in targeted improvements within the existing watershed-based conservation authority model, an approach that strengthens Ontario's long-standing and highly effective conservation framework.