

Public Works

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Public Input Coordinator
Species at Risk Protection Policy Section
300 Water Street 5th Floor, North Tower
Peterborough, ON
Ontario Ministry of Environment, Conservation and Parks

Via email: ESAREg@ontario.ca

RE: ERO Posting #019-8016 Endangered Species Act – Species at Risk Program

The Regional Municipality of Peel appreciates the opportunity to provide comments on the above referenced ERO posting, and provide for your consideration the following comments as it relates to Red Side Dace (O. Reg. 832/21):

1. The proposed amendment to reduce the timeframe from 20 years to 10 years to qualify as “occupied” Redside Dace habitat under the regulation, will result in many potential stream reaches being removed from the protected list, including several watercourses in the Region of Peel. This proposed amendment seems to be clearly at variance with the statement “All areas currently occupied by the species will remain protected under the ESA.”
2. With respect to recovery habitat, the focus should not solely be on “directly adjacent” to occupied habitat, but also to reaches/tributaries within a watershed which through restoration and stewardship efforts could become over time Red Side Dace habitat.
3. It is recommended that criteria be included that specifies a certain amount of sampling before a reach is delisted. For example, if no sampling occurs over a 10- or 20-year period, the reach should not be removed since there is no data on which to base that decision. These criteria should be science-based and developed with input from provincial (MNRF, MECP) scientific staff.
4. For the long-term protection of endangered species and their habitats, a science-based standardized methodology and monitoring program is essential. This ongoing and up-to-date information, provided either by the Province or through funding to stakeholders, will ensure accessibility, accountability and transparency of data to support opportunities for the habitat enhancement/restoration and species survival.

Once again thank you for the opportunity to comment.

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If you have any questions, please do not hesitate to contact me.
Sincerely,



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