



To: Public Input Coordinator
Species at Risk Protection Policy Section
Peterborough, ON
Ontario Ministry of Environment, Conservation and Parks
Date: February 20, 2024
Re: **ERO #019-8016** (<https://ero.ontario.ca/notice/019-8016>)

Thank you for the opportunity to provide comments on the proposed changes to the Ontario Endangered Species Act. Credit Valley Conservation staff have been involved in many aspects of Redside Dace recovery, including monitoring and stewardship for over two decades. We are also a member of the Redside Dace Recovery Implementation Team. Please find Credit Valley Conservation's comments and suggestions on the proposed changes below.

Comments

- In the Redside Dace section, the proposal states, "All areas currently occupied by the species will remain protected under the ESA." Please clarify how that would be the case if the window to confirm occupied habitat changes from 20 years to 10 or reaches currently identified as recovery habitat get re-designated because they are no longer directly adjacent to occupied habitat areas and are determined to be unsuitable for Redside Dace to carry out its life processes.
- NatureServe uses a 20-year period to assess occupancy and all the provinces biodiversity data centres follow the NatureServe guidelines, including Ontario's Natural Heritage Information Centre. The International Union for the Conservation of Nature uses a 10 year or 3 generation period for assessing population change. Assessing population change, however, differs from assessing occupancy and CVC recommends continuing to follow the 20-year standard used by NatureServe and all the provinces to assess occupancy.
- CVC recommends including criteria that specifies a certain amount of sampling before a reach is delisted. These criteria should be science-based and developed with input from MNR science staff. CVC also suggests that 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.
- Please clarify which data source is being used to determine the last confirmed record of Redside Dace in a watercourse and how records from camera detections are being tracked since there is no requirement to submit a record to the province as part of a Scientific Collection Permit.
- For recovery habitat, please clarify what criteria will determine whether a stream or watercourse is "directly adjacent" to occupied habitat?

- For recovery habitat, what scientific criteria will determine whether a reach is “currently suitable” to carry out the species life processes?
- Please clarify if recovery habitat will need to meet both criteria (i.e. recovery habitat is focused on streams or other watercourses directly adjacent to occupied habitat and areas that are currently suitable for Redside Dace to carry out its life processes) or just one.
- Redside Dace reaches and watersheds currently mapped as occupied or recovery habitat are generally consistent with mapping of Critical Habitat in the Federal Recovery Strategy and Action Plan. Given the protections afforded to the species under the federal Species at Risk Act, how will the province address inconsistencies in the identification of habitats between the two acts?

Please let me know if you have questions or require clarification.



Jon Clayton
Aquatic Ecologist

Cc: Phil Bird, Scott Sampson, Christine Wilson, Chelsea McIsaac, Redside Dace Recovery Implementation Team