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**Re: Redside Dace Recovery Strategy (Holland River)**

September 13, 2024

Dear SARA office,

We are writing to express our interest in seeing the Critical Habitat Order for the Redside Dace released as soon as possible. We were very happy to see its Recovery Strategy released recently: <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/recovery-strategies/redside-dace-proposed-2024.html#toc13>

As you know the Redside Dace is present in the Holland River, upstream of the proposed Bradford Bypass, a 16 KM highway planned by the Ontario government which would span the Holland River valley. It is clear from the Recovery Strategy that highway building and urban development will harm this species habitat making their recovery likely impossible. Its population status is currently “poor”. As the proposed Bradford Bypass is some distance downstream of the Redside Dace’s known current habitat, we are wondering how the Recovery Strategy would apply to the Bradford Bypass.

The proponent has piecemealed this project and already got a DFO letter of advice in order to destroy fish habitat - permanently - at the now underway interchange where the Bypass would go under Yonge St. The Ontario government plans to do more research into the presence of fish at the Detailed Design stage of this project. Had the Environmental Assessment considered alternatives in the past two decades, this location would likely not have been selected, and then perhaps doing this research at the detailed design stage would have been appropriate. But by waiving provincial laws requiring updates of decades old EA’s, this is the chosen route. It negatively affects multiple areas of Federal jurisdiction, including First Nations rights, fish, water, migratory birds, and endangered species. The Federal government should not reward the piecemealing of a significant infrastructure EA by delaying the delivery of the Critical Habitat Order.

Respectfully, we would like to know your timeline for the Critical Habitat Order?

In the meantime, would you please confirm our understanding that the measures outlined in Section 8.4 *Proposed measures to protect critical habitat*, are to be followed where the Redside Dace is found, now? (Figure 18.) Section 8.1.1 “including the entire bankfull channel width, the meander belt width and the riparian vegetation within it, and associated riparian vegetation extending 30 m out from the meander belt width.”

The Reside Dace is a canary in the coalmine for southern Ontario’s waters. We must protect its habitat now. The need is urgent.

We look forward to your response. Thank you.

Sincerely,

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