

To the Bradford Bypass Project Team
Via email to info@bradfordbypass.ca
ATTN: Katie Easterling, H.B.Sc, Senior Aquatic Biologist

From: Rescue Lake Simcoe Coalition
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Re: [Bradford Bypass Final Fish and Fish Habitat Existing Conditions and Impact Assessment Report](#)
2023 AECOM¹

February 7, 2024

Dear Ms. Easterling,

The Rescue Lake Simcoe Coalition (the Coalition) is requesting a response from the Bradford Bypass team concerning the **Fish Habitat Existing Conditions reports**, the most recent of which is hyperlinked above. The Coalition, our members, and concerned citizens would like to draw attention to undertakings we feel have been inappropriately rushed with deliberate attempts to under-represent the presence of fish and fish habitat including the American Eel.

There is only so much that can be achieved through avoidance and mitigation strategies; harm must be avoided in the first place. We are concerned that the plan is to do detailed design first and get input from the Department of Fisheries and Oceans Canada (DFO) too late to influence the design of the project.

The American Eel² was flagged by members of the Williams Treaties First Nations. Given the multiple areas of Federal jurisdiction affected by this matter, we expect the Federal government to do its due diligence. We also expect Ontario to follow its endangered species legislation, the Endangered Species Act (ESA). We also have concerns about the absence of the Redside Dace (also endangered) in the final Fish Habitat Existing Conditions report.

¹https://www.bradfordbypass.ca/wp-content/uploads/2023/11/RPT_Fish-IA_BBP_60636190_2023-08-22_secured.pdf

² The American Eel is currently being considered by the Federal Government for inclusion in the Federal Species at Risk list. (Consultation period ends April 8, 2024)#. It was listed by COSEWIC as threatened in 2012#, and it is listed on Ontario's species at risk list and the species and its habitat have been protected under the ESA since 2007.

The Redside Dace populations in Ontario are threatened by urban development. It too has federal protections. It is shocking that the report does not mention the Redside Dace. This will be elaborated upon below.

It appears that the Bradford Bypass AECOM and Ministry of Transportation Ontario (MTO) teams are missing the forest for the trees by applying a deliberately reductionist approach to the background studies for the Bypass. The eight lane highway would most certainly result in landscape-level losses including significant damage to the terrestrial and aquatic habitats of a wide variety of interconnected species. This is why **we are requesting due consideration is given to both past and proposed future works and activities to ensure, at a minimum, no net loss is achieved or habitat gains are made possible.**

To evaluate fish conditions without looking at both the past and proposed future decimation of some of their food sources, such as frog eggs, and the water quality of their current and proposed future environment, is inadequate. As it stands, we feel strongly that the proposed project contravenes provincial and federal policies, regulations, and legislation including the Fisheries Act and the Lake Simcoe Protection Plan's Ecosystem Approach³. If the parties involved intend to move forward with this large-scale project, we insist on greater efforts being put towards the protection of natural heritage and the species that rely on these features.

Having reviewed the publicly available report in detail, we have identified a number of items and deficiencies for which we respectfully request you to provide further information on:

1. Habitat

In the [Final Environmental Conditions Report \(ECR\)](#)⁴ dated October 2022 (pg. 93), the preamble to table 2-10 says, "*The fish species identified below in table 2-10 have been recorded in the specific watercourses throughout the Fish and Fish Habitat study.*" There are numerous fish in almost every water body listed. But as the work moves closer to the design stage, as the following questions and descriptions reveal, it appears that care was not taken to make sure the AECOM team has confirmed the presence of fish. Sampling appears inadequate and rushed. Species that should be searched for disappear from lists. The end result is described in the following question.

³ Lake Simcoe Protection Plan's Principles to Guide Our Actions includes: An Ecosystem Approach will be used, one that treats Lake Simcoe and its watershed as an interconnected system, individual components of the system, including humans and our activities, affect and are affected by other parts of the system. The Ecosystem Approach uses best available science, considers cumulative impacts, and promotes watershed and subwatershed approaches. It recognizes that a healthy environment provides the foundation for healthy communities and a healthy economy. Pg 5. <https://www.ontario.ca/document/lake-simcoe-protection-plan>

⁴ Final Environmental Conditions Report, October 2022 https://www.bradfordbypass.ca/wp-content/uploads/2022/10/RPT_2022-10-27_BBP-Final-ECR_60636190_AODA.pdf

Q 1a. Given the abundance of fish identified in the Final ECR, we question how only 3 out of 40 watercourses are listed as “significant fish habitat” in the Fish Conditions appendix to the Final Environmental Impact Assessment Report. Where is corresponding and supporting data to confirm these findings?

The definition of fish habitat under the Fisheries Act refers to “...water frequented by fish and any other areas on which fish depend directly or indirectly to carry out their life processes, including spawning grounds and nursery, rearing, food supply and migration areas.” Regardless of the significance of the fish habitat, greater consideration must be given to all habitat types that broadly fall under Fisheries and Oceans Canada’s definition and not be limited to just “significant fish habitat”.

Q 1b. “Significant fish habitat” is not defined in the Fisheries Act, or the Fish and Fish Habitat Existing Conditions Appendix, nor the ECR; therefore, it requires further explanation/elaboration. How does the consultant define significant? What is the purpose of the “Significant Fish Habitat” column in the Fish Conditions appendix to the Final Environmental Impact Assessment Report?

In the Fish Habitat Existing Conditions Appendix, 24 of 40 water bodies are classified as Indirect or Not Fish Habitat even when there is information about upstream and downstream habitats (which likely support life processes - see definition of fish habitat above). Many of these are tributaries to the rivers the reports acknowledge are direct fish habitat.

Q 1c. What is the justification for the determination that tributaries to fish bearing rivers are not fish habitat? Further, how can a permanent stream not be considered fish habitat? (I.e. See example directly below from the Appendix, Fish Habitat Existing Conditions.)

Waterbody ID	Date	Flow	Thermal Regime	Fish Habitat*	Substrate Type (in order of dominance)	Channel Morphology	Vegetation	Constraints and Opportunities	Significant Fish Habitat
Waterbody Name: Crossing Locations: C27-A-1, (WC-33)	2022-05-19	Permanent	Warm (MNRF, 2019a)	Direct Habitat: naturalized, meandering channel with a riffle run morphology. Clear water was flowing south to north. Some bank slumping was observed but the banks were well vegetated with water tolerant species. Woody debris was observed throughout the reach and shore cover was moderate (60-90%).	Silt (65%), sand (25%), boulder (5%), gravel (5%)	Run (95%), riffle (5%)	Unidentified submergent vegetation and various grass species	N/A	N/A

Q 1d. What justification and criteria are being used to characterise the various water bodies (i.e., intermittent, permanent)?

2. Field Investigations

Field investigations are described on page 91 of the Final Environmental Conditions Report. As per the Fish and Fish Habitat Existing Conditions Appendix, it appears field investigations were insufficient as at least 7 sites had only one site visit, but were labelled as “not fish habitat”. (Unable to provide page numbers; there are no page numbers in the report.) These investigations failed to take into account temporal variations and seasonality and call into question the validity of the findings.

Q 2a. According to the report, at least half of the field investigations occurred on Sept 16, 2020 and June 15, 2021. However, we question the feasibility in investigating all of the sites in two days as well as the thoroughness (or lack thereof) of the field investigations. How many people were sent out on each of those days to do the investigations?

Q 2b. What kind of backpack electrofishing happened?

For the following questions, please provide specific references to ensure transparency by providing the names and wording of the guides you have followed and the years the guides were most recently changed.

3. Concerns about the American Eel

The federal government is considering adding the American Eel to the List of Wildlife Species at Risk (Schedule 1) of the *Species at Risk Act* (SARA) which would afford it additional protections. It is already protected in Ontario by the ESA.⁵ Please note, below we have included some of those ESA objectives, one of which is to fill knowledge gaps. That has not happened here.

AECOM’s reports indicate that the source of the notification of the American Eel is the Williams Treaty First Nation, in 2022.⁶ American Eel appears as present in both the East

⁵ American Eel ESA recovery Strategy Objectives of note:

- Maintain strong Ontario participation and leadership in the development and implementation of coordinated inter-jurisdictional protection, management and recovery of the American Eel and its habitats at national and bi-national levels.
- Ensure ongoing understanding by scientists, managers, stakeholders, First Nations and the general public of the current status of the American Eel and the efficacy of recovery strategy actions.
- Address knowledge gaps to enable and enhance protection, conservation and recovery efforts.

Source: American Eel ESA recovery strategy: <https://www.ontario.ca/page/american-eel-recovery-strategy>

⁶ [Final Fish and Fish Habitat Existing Conditions and Impact Assessment Report, August 2023](#). pg. 11.

and West Holland Rivers in many of the documents reviewed in the preparation of this letter. For instance:

- In the Fish and Fish Habitat Existing Conditions Appendix, Table 2, American Eel is listed as “personal communication.” The [August 2023, Final Fish Conditions Report and Impact Assessment](#)⁷ says, “Records of American Eel were found in the Holland River and Holland River East Branch where the associated bridge works are located,” (Pg. 81). In the Fish and Fish Habitat Existing Conditions Appendix, Table 2, under the column heading “**species at risk present**” for both the East and West Holland Rivers it says **NO. Not MAYBE.**

Q 3a. We would like to know what you have done and will do to determine whether the American Eel species is present or not.

Q 3b. Have you consulted specifically with First Nations about the endangered species?

Final Environmental Conditions Report, Pg 111 says the following:

2.1.2.3.2 Aquatic Species at Risk

“Under the Ontario Endangered Species Act and the federal Species at Risk Act, only species listed as Threatened and Endangered receive *individual and habitat protection*. For the purposes of this Report, these species will be considered Species at Risk. *It is important to note that any Special Concern species potentially present within the Fish and Fish Habitat Study Area may be uplisted to Threatened or Endangered during the lifetime of the project. [emphasis ours]* Should this occur, relevant federal and provincial government agencies should be consulted immediately to determine how to proceed and avoid contravention of the Endangered Species Act and/or Species at Risk Act.

“... The only aquatic Species at Risk identified by Ministry of Environment,] Conservation and Parks as potentially occurring within the Fish and Fish Habitat Study Area was American Eel (*Anguilla rostrata*). The American Eel is an endangered freshwater eel (not currently listed under the Species at Risk Act; however, it is listed provincially as Endangered under the Endangered Species Act, and federally as Threatened under the Committee on the Status of Endangered Wildlife in Canada) found in Ontario. An American Eel was captured in the North Holland Canal on a previous Ministry of Transportation project, and the North Holland Canal is connected to the Holland River (WC-10) and Holland River East Branch (WC-25) approximately 11 kilometres upstream of the Holland River crossing. **Therefore, American Eel should be considered as**

⁷ Final Fish and Fish Habitat Existing Conditions and Impact Assessment Report, August 2023. https://www.bradfordbypass.ca/wp-content/uploads/2023/11/RPT_Fish-IA_BBP_60636190_2023-08-22_secured.pdf

potentially present in these two watercourses within the Fish and Fish Habitat Study Area”.⁸

And further:

“The **potential for American Eel (Endangered) to be present in the Holland River (WC-10) and Holland River East Branch (WC-25) will require further review once the design process has advanced.** Further discussions with Ministry of Natural Resources and Forestry and Ministry of the Environment, Conservation and Parks are recommended during the Detail Design stage to determine approvals that may be required under the Endangered Species Act.)⁹

Given the fact that the American Eel has been identified at the **East Holland River** (see above), a field investigation would be warranted. But this was not done.

ECR Table 2-10, Fish Species Records, WC-25 (watercourse 25, which is the **Holland River East Branch**) relies on a 2019 survey done by the MNRF and lists a number of species, but neglects to mention the American Eel. Pg. 95.

The first table of Appendix A, Fish and Fish Habitat Conditions Report, indicates **two** visits to this site, **WC-25 the Holland River East Branch**, but there is no mention of the American Eel.

Table 2 of the same Appendix report, referred to as “Fish Community Summary; Template D2B”, provides some additional information under the column “species at risk present”. No fisheries assessment was conducted specifically for the American Eel and, again, the consultant relies entirely on the 2019 study done by the MNRF.

Similarly, although there is potential for American Eel to be present in the **West Holland River at C17-A-1 (WC-10)**, no fish sampling was conducted. See below. We find it alarming that there were so few site visits, and that there was no sampling in some obvious and important locations.

C17-A-1 (WC-10): West Holland River	■ NA	<ul style="list-style-type: none"> ■ Fish sampling not attempted due to sufficient background information available for the West Holland River ■ MNRF, 2019a: Rock Bass, Brook Stickleback, Northern Pike, Johnny Darter/ Tessellated Darter, Pumpkinseed, Largemouth Bass, Emerald Shiner, Yellow Perch, Black Crappie, Walleye, Common Carp, Golden Shiner, Bluntnose Minnow and Spottail Shiner. ■ Pers Comm: American Eel. 	■ N
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Q 3c. Although the North Holland Canal was listed as the site of the American Eel, it was not apparently investigated. It doesn’t appear in these documents. Can you please explain why?

⁸ Final Environmental Conditions Report, Pg 111.

⁹ Final Environmental Conditions Report, Pg 115.

Q 4c. The [August 2023, Final Fish Conditions Report and Impact Assessment](#),¹⁰ references to American Eel are made on page 10 and state, “Historical Records of the American Eel Were returned in the Holland River and Holland River East Branch,” pg. 10. What does that mean?

Q 4d. Table 5-5 of the [August 2023, Final Fish Conditions Report and Impact Assessment](#), acknowledges that the American Eel “has the potential to be present in the West Holland River” (Pg 64). We question why it does not say the same about the East Holland and the North Holland Canal. How were these two water bodies ruled out as potential habitats?

Q 4e. There is a pattern of too much reliance on the 2019 study done by the MNRF instead of field investigations. How representative is the study? What types of assessments were done? Does it account for temporal variations and seasonality? Please provide a longer term dataset to better determine baseline conditions for future monitoring and assessments to be compared to.

Q 4f. What efforts were made through field investigations to confirm the presence/absence of the American Eel in the watercourses cited?

Q 4g. What is the reference document and year for this: An American Eel was captured in the North Holland Canal on a previous Ministry of Transportation project”?

4. Concerns about the Redside Dace

The executive summary of Canada’s Species at Risk registry¹¹ says, “The Redside Dace was assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) as endangered in 2007 and again in 2017; the species was listed as endangered under the Species at Risk Act (SARA) in 2017. This recovery strategy and action plan is considered one in a series of documents for this species that are linked and should be taken into consideration together, including the COSEWIC status report, a recovery potential assessment, the action plan for the Rouge National Urban Park, which includes Redside Dace, and possibly further action plans. **Recovery has been determined to be biologically and technically feasible.**” The population status is listed as poor, but not extirpated in Table 2. The threat from residential and commercial development is high (Table 3). This is clearly a species that needs protection. We are concerned that not enough is being done to find and protect this species.

¹⁰ [Final Fish and Fish Habitat Existing Conditions and Impact Assessment Report, August 2023.](https://www.bradfordbypass.ca/wp-content/uploads/2023/11/RPT_Fish-IA_BBP_60636190_2023-08-22_secured.pdf)
https://www.bradfordbypass.ca/wp-content/uploads/2023/11/RPT_Fish-IA_BBP_60636190_2023-08-22_secured.pdf

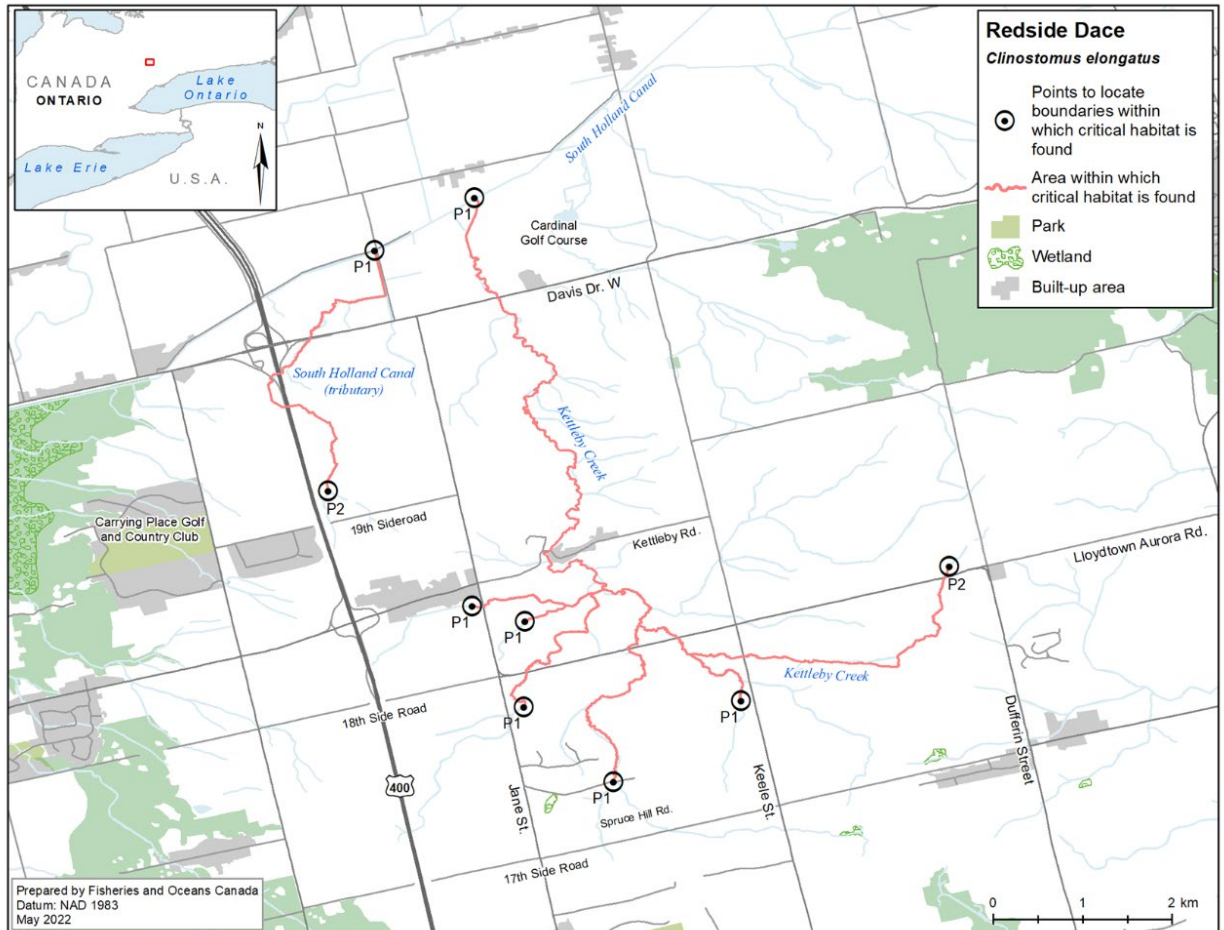
¹¹ Redside Dace Recovery Plan and Strategy <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/recovery-strategies/redside-dace-proposed-2024.html>

The following, from the Bradford Bypass Final Environmental Conditions Report, p. 111, indicates that the Redside Dace fish is in numbers of creeks close to the Bypass: “Redside Dace (*Clinostomus elongatus*) have been known to reside in both the Holland River East Branch and Holland River subwatersheds. However, captures of Redside Dace have only been noted in Sharon Creek, Kettleby Creek, and the 400 Creek, all of which occur outside the Fish and Fish Habitat Study Area (Lake Simcoe Region Conservation Authority, 2010 and Lake Simcoe Region Conservation Authority, 2010b). The only aquatic Species at Risk identified by Ministry of Environment,] Conservation and Parks as potentially occurring within the Fish and Fish Habitat Study Area was American Eel (*Anguilla rostrata*).”

Strangely, the Final Fish and Fish Habitat Existing Conditions and Impact Assessment report, Aug 2023, does not mention redside dace. The proposed federal 2024 Recovery Plan and Strategy for Redside Dace¹² mentions that The Holland River watershed is one of 17 watersheds named with respect to population and distribution objectives (section 6 of the Recovery Plan and Strategy). The Strategy is premised on protecting and recovering extent and historic populations. The Holland River is identified as having areas of critical habitat for Redside Dace (section 8.1.3). There's a description, coordinates and a map, copied below (Figure 18). It does not appear that the proposed highway cuts through these rivers but it should be double checked with appropriate map tools. The streams identified as critical habitat found for Redside Dace in the Holland River watershed in figure 18 flow into the other rivers affected by the Bypass.

Q 4a. Given that the Redside Dace is in the below tributaries of the Holland River, what protection should be afforded to the habitat of the Redside Dace?

¹²Redside Dace Recovery Plan and Strategy <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/recovery-strategies/redside-dace-proposed-2024.html>



Source: Figure 18 Redside Dace Recovery Plan and Strategy

5. Timing concerns

Now we turn to the issue of timing. When exactly are decisions affecting the highway route made? The assumption in the work done by AECOM / MTO for the Bypass appears to assume that permissions will be granted and that remediation is all that is required. We argue that this is not the purpose of Federal review. The DFO's review should INFORM the route, and indeed whether this project is feasible.

On page 115 of the ECR, it states impacts to fish will be evaluated in relation to preliminary design. Then in the [August 2023, Final Fish Conditions Report and Impact Assessment](#),¹³ which WAS released in the preliminary design set of reports, (see image below), it refers to doing the mitigation at the detailed design stage.

¹³ [Final Fish and Fish Habitat Existing Conditions and Impact Assessment Report, August 2023.](https://www.bradfordbypass.ca/wp-content/uploads/2023/11/RPT_Fish-IA_BBP_60636190_2023-08-22_secured.pdf)
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BRADFORD BYPASS

[OVERVIEW](#)[STUDY PROCESS](#)[EARLY WORKS](#)[REPORTS](#)[SCHEDULE](#)[CONSULTATION](#) ▾[FAQ](#)[CONTACT](#)

Preliminary Design:

- [Final Environmental Conditions Report](#)
- [Final Environmental Impact Assessment Report](#)
- [Final Groundwater Protection and Well Monitoring Plan](#)
- [Final Stormwater Management Plan](#)
- [Final Noise Report](#)
- [Final Terrestrial Ecosystems Existing Conditions and Impact Assessment Report](#)
- [Final Fish and Fish Habitat Existing Conditions and Impact Assessment Report](#)
- [Final Fluvial Geomorphology Impact Assessment Report: Holland River Crossings](#)
- [Final Fluvial Geomorphology Impact Assessment Report: Bradford Bypass Crossings](#)
- [Final Air Quality Impact Assessment Report](#)
- [Final Cultural Heritage Resource Assessment Report](#)
- [Final Land Use Factors Report](#)
- [Final Agricultural Impact Assessment Report](#)
- [Final Human Health Implications Scoping Report](#)
- [Final Waste and Excess Materials Management Plan](#)

Source: Project website: BradfordBypass.ca

In Table 5-5 in the [Final Fish Conditions Report and Impact Assessment \(2023\)](#), it states, with respect to the American Eel, “Works may be subject to approvals under the Endangered Species Act. This shall be confirmed during the Detail Design stage. Further discussions with MNRF and MECP are recommended,” (Pg 64). It goes on to describe that this should occur “early in the detailed design phase to confirm ESA permitting requirements,” (Pg 74).

This project is already at the preliminary design phase and, as such, the impacts to fish should have already been evaluated, and these assessments should have influenced the project design long ago. There is only so much that can be achieved through avoidance and mitigation strategies. Harm must be avoided in the first place. With the potential for American Eel and possibly the Redside Dace to be present in some of these locations and, coupled with insufficient monitoring and field investigations, further studies are warranted before the project or approvals proceed.

Q 5a. Is it possible that provincial and federal endangered species permits would be issued before the final design phase?

Q 5b. Could federal fisheries authorizations or letters of advice be issued before the final design phase?

There are numerous references to trout in the Final Fish and Fish Habitat Existing Conditions and Impact Assessment report, Aug 2023. There appears to be just an email

confirmation of critical information that informs the permissions for in water works timing, with major ramifications for all species (See pg. 122).

The Final Environmental Conditions Report says, “Due to the warm/coolwater designation for all the fish-bearing watercourses identified in the Fish and Fish Habitat Study Area, the in-water work timing window (when work can occur) for direct and indirect watercourse locations is from July 16 to March 14 of any year. **No records of fall-spawning species were retrieved from background data collection or observed during field investigations for all other watercourse features. The impact assessment (to follow under separate cover) conducted by certified Fisheries Assessment Specialists will assess in detail the potential impacts to fish and fish habitat based on the Preliminary Design, provide the mitigation measures and Ontario Provincial Standard Specifications required to avoid or mitigate the risk of harm, and identify the appropriate steps of the Fisheries Protocol (2020) applicable to the project and associated notification, assessment or regulatory review required.**”¹⁴

Q 5c. The lack of any records with respect to fall spawning in any area of the route of the Bypass is alarming. The absence of such important information essentially permits in-water works to occur July 16 to February 28th or March 14, 8 months of the year. Do you have any external expert opinion confirming the appropriateness of this course of action? This strikes us as a conclusion we would like outside opinions on.

Q 5d. Has the AECOM team engaged the Lake Simcoe Fisheries Committee meaningfully in this consultation? Have consultations occurred with other experts, for instance fish specialists on COSEWIC?

Conclusion

In conclusion, we find that inadequate efforts have been made to determine the presence of fish and their spawning times, which affect the in-water works timing. There has been no clear attempt to provide overall benefit to affected species, and there is no assurance that mitigation will be adequate. It appears that there has been a willful attempt to not look for fish in locations where species at risk have been known to occur; the cavalier treatment of the American Eel and the absence of information about the Redside Dace is particularly egregious. These endangered species need to be fully investigated and the project should not proceed until these reviews are complete. We would also like to see a peer review or a second opinion on the presence or absence of fall spawning, as this one claim has a significant impact on the water bodies affected by this proposed Highway, and all the fish and life within.

¹⁴ Final Environmental Conditions Report p 115.

As you know, as we all know, this project would serve the two fastest growing municipalities in Canada, Bradford West Gwillimbury and East Gwillimbury. The entire justification for the project is to support existing and planned urban / suburban growth in the area. The environmental impacts that this highway will deliver will be massive, in that it will serve a big expansion of urban boundaries and sprawl, which is the driver of pollution at Lake Simcoe. Pretending that there are no impacts after the project is built is frankly myopic and ridiculous. Thus we request due consideration is given to both past and proposed future works and activities to ensure, at a minimum, no net loss is achieved or habitat gains are made possible.

We look forward to your detailed response to these questions.

Sincerely,



Claire Malcolmson

Executive Director, Rescue Lake Simcoe Coalition

The Rescue Lake Simcoe Coalition is a lake-wide member-based organisation, representing 30 groups in the Lake Simcoe watershed, that provides leadership and inspires people to take action to protect Lake Simcoe. www.rescuelakesimcoe.org

Document guide:

Final Environmental Conditions Report, October 2022 https://www.bradfordbypass.ca/wp-content/uploads/2022/10/RPT_2022-10-27_BBP-Final-ECR_60636190_AODA.pdf

[Final Fish Conditions Report and Impact Assessment, 2023](#)

Final Fish and Fish Habitat Existing Conditions and Impact Assessment Report, August 2023.

https://www.bradfordbypass.ca/wp-content/uploads/2023/11/RPT_Fish-IA_BBP_60636190_2023-08-22_secured.pdf

Final Environmental Impact Assessment Report, November, 2023

https://www.bradfordbypass.ca/wp-content/uploads/2023/11/RPT_2022-11-16_BBP_FinalEIAR_60636190_AODA_secured_web_resized-compressed.pdf

[Appendix A – Fish and Fish Habitat Existing Conditions](#), November, 2023

https://www.bradfordbypass.ca/wp-content/uploads/2023/11/Appendix-A_FishExistingConditions_secured-1.pdf

CC:

Minister Prabmeet, MTO

Minister Khanjin, MOECP

Minister Grayson, MNRF

Lake Simcoe Fisheries Committee

Williams Treaties First Nations

First Nations consulted on the Bypass

NDP Highways critic Jennifer French

NDP Environment critic Sandy Shaw

Liberal MECP critic Mary-Margaret McMahan

Liberal Critic, Indigenous Affairs, Adil Shamji

ESA American Eel consultation contact

Bill Foster, Forbid Roads Over Green Spaces (FROGS)

Margaret Prophet, Simcoe County Greenbelt Coalition

Laura Bowman, Ecojustice

Adam Weir, Ontario Federation of Anglers and Hunters

Rob Baldwin, LSRCA