

Recovery Team for BC Non-Game Freshwater Fish
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SARA Secretariat
Department of Fisheries and Oceans
200 Kent St.
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Re: Public comments on the National Recovery Strategy for Nooksack Dace

As the scientific authors of this Recovery Strategy, we are pleased that DFO has chosen to include a description of critical habitat in the Recovery Strategy that largely reflects the technical description that we outlined in our assessment¹ submitted for peer-review to the Pacific Salmon Advisory Research Council (PSARC). However, we would like to clarify key aspects of Critical Habitat identification and protection that were not made sufficiently explicit in our PSARC document.

In the PSARC document we identify riparian habitats of specified widths as necessary components of Critical Habitat for Nooksack dace and Salish sucker. This riparian habitat is necessary to provide specific functional attributes that are critical to the maintenance of instream habitat quality, including shade, bank stability, and a supply of large woody debris. The riparian zone must therefore be forested or have the appropriate site-potential vegetation type (as identified using the Riparian Area Regulations Assessment Methods) to provide these functions. Permitted activities within the riparian portion of critical habitat must therefore not impair the ability of riparian habitat to confer these functions.

Our identification of activities that should not be permitted in critical habitat was incomplete in the PSARC document as it did not explicitly identify the necessity for riparian critical habitat to be forested (or to have the appropriate site-potential vegetation type as identified in the Riparian Area Regulations, which is generally forest in the watersheds where dace are present), although this was our intent. Activities that prevent re-establishment of the natural riparian community at a site, or interfere with re-vegetation should not be permitted in the riparian part of critical habitat. This would include, for example, activities such as agriculture, livestock grazing, and application of herbicides and pesticides, which will clearly degrade the riparian portion of critical habitat and prevent it from providing the ecological functions necessary to protect instream critical habitat for Nooksack dace and salish sucker.

We recognize that measures to protect the riparian portion of Critical Habitat will require time and considerable negotiations to implement, and we fully support the efforts of agencies to achieve these goals. However, activities that prevent the timely re-establishment of full natural riparian vegetation within the designated riparian Critical Habitat area will not achieve the goal of protecting critical habitat for Nooksack Dace as defined by the Recovery Team.

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¹ Pearson, M.P. 2007. An assessment of potential critical habitat for Nooksack dace (*Rhinichthys cataractae* ssp.) and Salish sucker (*Catostomus* sp.). Pacific Scientific Advice Review Committee. Fisheries and Oceans Canada, Ottawa.