

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 337  
February 1, 2017

Ms. Dina Lundy, Clerk  
Town of Erin  
5684 Trafalgar Road  
Hillsburgh, Ontario  
NOB 1Z0

Dear Ms. Lundy:

Subject: Station Street Dam and Bridge EA

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, conservation-based organization, representing 100,000 members, subscribers and supporters, and 740 member clubs. Our organization is heavily invested in the conservation of Ontario's native fish species such as Brook Trout (*Salvelinus fontinalis*). As such, the OFAH is concerned with the Town of Erin's recommended preferred alternative of rehabilitating the Hillsburgh Dam (Alternative B1). The results of the Natural Environment Report included in the Environmental Assessment indicated that the best course of action from an ecological perspective would be to decommission the dam, rehabilitate or repair the bridge, and either remove the pond or create an offline pond (Alternatives C and D), which the OFAH fully supports.

Brook Trout in Southern Ontario are under significant stress from a population perspective, primarily through the loss of habitat. This species thrives in cold-water tributaries of the Great Lakes such as the Credit River. The pond created by the Hillsburgh Dam warms the water during the summer months, and has a significant negative downstream impact on the thermal regime of the stream. This in turn, impacts the survival of Brook Trout in those areas. The West Credit River is being managed for Brook Trout by the Credit Valley Conservation (CVC) according to the Credit River Fisheries Management Plan (CRFMP), and this plan calls for the removal of dam structures in this reach of river with specific reference to this Hillsburgh Dam. Therefore, it is confusing that the town would plan to rehabilitate the Hillsburgh Dam.

From a cost perspective, the current recommendation is not rational. Firstly, Trout Unlimited Canada (TUC) and the Ministry of Natural Resources and Forestry (MNR) indicated that they would provide in-kind contributions to assist with the decommissioning of the dam and even the construction of an offline pond, should it be necessary. Secondly, the Town of Erin maintains that the reconstruction of the bridge and dam, the operation and maintenance of both the dam and pond over the effective life of the design of the dam will be less than the removal of the dam. This is contrary to the MNR's assessment of the situation in their June 30, 2016 letter to Triton Engineering Services Ltd.

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The ecological benefits of returning the West Credit River to its natural course are numerous and include the restoration of a natural thermal regime to the West Credit River, the restoration of the natural hydrology of the area, as well as improvements to the aquatic ecology and the cold-water fish community of this reach of the river. Given these concerns, the OFAH requests that the Town of Erin re-evaluate their selected course of action in reconstructing the Hillsburgh Dam, and re-assess the decommissioning options that were removed from the comparison of alternatives in this assessment.

We appreciate the opportunity to comment on this regionally significant decision and will be maintaining our involvement during the remainder of this project.

Yours in Conservation,

A handwritten signature in dark ink, appearing to read 'Tom Brooke', with a stylized flourish at the end.

Tom Brooke, M.Sc.  
Fisheries Biologist

TB/gh

cc: OFAH Zone J Executive  
Matt DeMille, OFAH Manager, Fish & Wildlife Services