

# ONTARIO FEDERATION OF ANGLERS & HUNTERS

P.O. Box 2800, 4601 Guthrie Drive, Peterborough, Ontario K9J 8L5  
Phone: (705) 748.6324 • Fax: (705) 748.9577 • Visit: [www.ofah.org](http://www.ofah.org) • Email: [ofah@ofah.org](mailto:ofah@ofah.org)



*Ontario Conservation Centre*

OFAH FILE: 420/420S

April 8, 2021

The Honourable Jonathan Wilkinson  
Minister of the Environment and Climate Change  
House of Commons  
Ottawa, Ontario  
K1A 0A6

Dear Minister Wilkinson:

Subject: Reference Number 81434 - Town of Erin Urban Centre Wastewater Treatment Plant

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, fish and wildlife conservation-based organization, representing 100,000 members, subscribers and supporters, and 725 member clubs. We are writing today to extend our support of the request by the Coalition for the West Credit River (the "Coalition"), a coalition of concerned organizations (including the Belfountain Community Organization, West Credit River Watch, Izaak Walton Fly Fishing Club, Trout Unlimited Canada – Greg Clark Chapter, Ontario Streams, and the Ontario Rivers Alliance), for the proposed Town of Erin Urban Centre Wastewater Treatment Plant being designated for a federal Environmental Assessment under Subsection 9(a) of the Impact Assessment Act.

The OFAH's interests in the Credit River and, in particular, the West Credit River, are relevant to this proposed development and the request for it to be reviewed by the federal government in detail. OFAH Zones H, G, and J include or border the location of the proposed wastewater treatment plant (WWTP), and OFAH members are passionate anglers of Brook Trout in Ontario, many of whom include the Credit River in their fishing travels. The OFAH was an invited participant in a 2012 Credit River Brook Trout workshop hosted by the local conservation authority (Credit Valley Conservation) and at provincial Brook Trout workshops developing long-term conservation plans for this important native species.

Further, the OFAH is a founding and lead partner in the Lake Ontario Atlantic Salmon Restoration Program, an effort to restore this historic species to the Lake Ontario basin after its extirpation in the late 1890s. Since 2006, the OFAH, the Ontario Ministry of Natural Resources and Forestry (MNR), and many other partners have been active in a number of watersheds, including the Credit River, to bring this native species back through stocking, habitat restoration, research and monitoring, and outreach and education. The West Credit River includes Atlantic Salmon stocking sites and prime potential spawning habitat is only a few kilometres from the proposed WWTP location. We also use the West Credit River in the village of Belfountain to stock Atlantic Salmon raised by local schools. We were not, however, consulted as a stakeholder during the long process leading up to the approval of the project by the province.

The Coalition has already provided you and your Ministry with a detailed statement of its concerns; we will not repeat it here, but we do ask you take it into consideration during your decision-making process. We will, however, highlight the OFAH's most significant concerns:

First, the assessment of Brook Trout in the West Credit River and the proponent's understanding of the potential negative impacts to Brook Trout, are inadequate. Previously, the status of wild Brook Trout in this tributary did not support the discharge of wastewater into the West Credit River; it is not transparent as to what, if anything, has changed to now allow this major development to occur.

Second, water temperature and its consequences on water quality have not been addressed sufficiently, including the risk of extreme events. Brook Trout, and the entire stream ecosystem, can be vulnerable to a single event of short duration, and they cannot easily recover from these impacts, if they can recover at all. These extremes were not modelled during the planning process, and we live in a time of climate extremes.

The project's publicly available documentation appears to show the province repeatedly raising these issues, and the proponent's consultants dismissing them, until in the end the province appears to surrender on the issues. Requests from the public for more information on the decision-making process have not produced answers. The proponent also appears unwilling to address how this project will interact with the cumulative effects of increased water-taking by a larger population base and climate change, which is not what a government acting in the public's interests should be doing in 2021.

The consequence of this process to date is a proposed project that is not doing its utmost to consider alternatives to minimize its impacts on sensitive and flagship species and habitats. The OFAH is not opposed to sustainable development, but we take seriously the impacts to fish habitat of such development, including water quality as covered under Section 36(3) (Deposition of Deleterious Substances) of the Fisheries Act. While public comments have been made by the proponents that temperature and other parameters will be monitored throughout the construction and operation of the WWTP and adjustments made if needed, since such technologies are available a sounder, more precautionary and ultimately more cost-effective approach for taxpayers is to install the technologies proactively and be a leader in wastewater treatment.

To that end, we expect a more thorough review by the federal government will consider requiring the municipality to adopt measures to ensure an appropriate water quality for effluent from the proposed WWTP into the sensitive West Credit River. We urge a maximum temperature threshold of 19 degrees Celsius be adopted, with an average temperature of 17 degrees Celsius as the target to ensure an appropriate thermal regime of the effluent to support coldwater species such as Brook Trout. We recommend additional measures be taken to ensure this appropriate thermal regime of the effluent, such as housing WWTP processing tanks indoors where they can be cooled, subsurface discharge, insulating infrastructure, and/or other mitigative measures as based upon comprehensive thermal modelling; other jurisdictions and the Markdale (ON) WWTP have demonstrated these technologies. Facilitating a cooler water effluent will also reduce the effects of other water quality parameters such as ammonia. Additionally, this maximum thermal threshold will help buffer future effects of climate change to mitigate the levels of impacts on the West Credit River. The OFAH also recommends the use of aerators to increase the level of dissolved oxygen to 9-10 mg/L to support healthy coldwater stream function, and de-chlorination to ensure this water quality parameter is not at a level to cause harm to aquatic life.

Additionally, the OFAH also recommends a review consider requiring the municipality to mitigate the two dams within the Town of Erin (Charles Street and Churchill Lane) to improve the thermal regime, assimilative capacity, aquatic connectivity and stream processes such as sediment transport to benefit coldwater species such as Brook Trout. This proactive measure will enhance Brook Trout habitat and population health to compensate for any potential negative effects of the WWTP effluent and climate change, and would improve the health of the West Credit River prior to it reaching the WWTP outfall. These recommendations to Erin are particularly necessary as the impacts of the WWTP extend into another municipality, the Town of Caledon, where the effluent will be discharged.

We hope the federal government will use its mandate and tools under the Impact Assessment and Fisheries Acts to give this project the review it warrants. We believe a better WWTP project is possible, one that addresses both the growth needs of the municipality and the short- and long-term health of the West Credit River.

Thank you for taking these comments under consideration. I am available to discuss this further at 705-761-1276 or [chris\\_robinson@ofah.org](mailto:chris_robinson@ofah.org).

Yours in Conservation,



Chris Robinson, M.Sc.  
Fish and Wildlife Conservation Programs Manager

CR/jb

cc: Honourable Jeff Yurek, Minister of the Environment, Conservation and Parks  
Honourable John Yakabuski, Minister of Natural Resources and Forestry  
Michael Chong, MP, Wellington-Halton Hills  
Ted Arnott, MPP, Wellington-Halton Hills  
Mayor Allan Alls and Council, Town of Erin  
Mayor Allan Thompson and Council, Town of Caledon  
Judy Mabee, Chair, Coalition for the West Credit River  
OFAH Board of Directors  
Angelo Lombardo, OFAH Executive Director  
Matt DeMille, OFAH Fish and Wildlife Manager  
Mark Ryckman, OFAH Fish and Wildlife Policy Manager  
Adam Weir, OFAH Fisheries Biologist  
OFAH Lake Ontario Atlantic Salmon Restoration Program Staff