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Barbara Slattery, EA Planning Coordinator
Ministry of Environment, Conservation and Parks
119 King Street West, 12th Floor
Hamilton, Ontario
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By email: Barbara.Slattery@Ontario.ca

Re: Town of Erin Urban Center Wastewater Servicing Class Environmental Study Report
Concerns over Brook Trout and Fish Habitat on the West Credit River

Dear Ms. Slattery:

The Ontario Rivers Alliance (ORA) is writing further to our [25 March 2021 response](#) to your [3 December 2020 email](#) response to our [23 June 2020 submission](#). We refer you again to the issue of the Culvert, in which you stated that “*the 45m long culvert represents degraded habitat because it is permanently shaded, does not permit macrophyte growth and limits the form of the stream bed and width of the channel*”.

We responded that “*Even though the culvert is 45m long and 100% shaded, it has a natural substrate of cobbles and gravel. The substrates allow for production of invertebrates which is an important food source for Brook Trout. Macrophyte growth is not important to the species. We submit that the habitat within the culvert is not degraded and likely supports Brook Trout throughout the year*”.

You also suggested that the habitat within the culvert is degraded when you said, “*According to modelling, Brook Trout’s upper tolerance threshold temperatures are met at the diffuser from January to June. During July, background 75th percentile West Credit River water temperatures exceed the upper tolerance threshold value of 19°C, therefore the threshold will not be met downstream in that month. From August to December the distance to the point where effluent temperature declines to the upper tolerance threshold ranges from -2.5 m (backflow from the diffuser) to 32 m. These distances are in the degraded habitat within the culvert.*”

To confirm our position that the habitat within the culvert is not degraded and supports Brook Trout throughout the year, we draw your attention to a video by Steven Noakes, a local videographer, entitled, [Brook Trout fry at proposed outfall location Erin WWTP](#), taken on the 30th of April 2021 in and around the culvert at the proposed effluent discharge site. The video confirms that Brook Trout fry are abundant in and around the culvert and demonstrates that the culvert habitat is not degraded, removing any question that it supports Brook Trout. In addition, Brook



Trout spawning activity occurs a short distance above and below the culvert, where redds are abundant within 75 to 100m of it. There is no question that this area supports Brook Trout in various life stages.

We would also like to point out two tributaries entering the West Credit River on the west side of the culvert, that are very important groundwater sources providing thermal cooling and fry nursery habitat. The tributary approximately 80m upstream of the culvert on the south side had a dozen or two fry in it at the beginning of April, and the other tributary is on the north side, approximately 15 to 20m from the culvert.

We submit that not doing proper Brook Trout spawning and fry emergence surveys was a grave error in the decision-making process for the outfall location; and that both Winston Churchill Blvd. and 10th Line sites are equally sensitive and inappropriate for sewage effluent discharge.

The ORA strongly recommends that an alternative location be found for the Erin Wastewater Treatment Plant outfall.

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance
Partner, Coalition for the West Credit River
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