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Izaak Walton
Fly Fishing Club



Trout Unlimited Canada



Greg Clark Chapter

12 May 2021

The Honourable Bernadette Jordan
200 Kent St., Station 15N100
Ottawa, Ontario
K1A 0E6

By email: Min@DFO-mpo.gc.ca

Re: Erin Wastewater Treatment Plant – Impact Assessment Agency Reference No: 81434
Designation Request under Subsection 9(1) of the *Impact Assessment Act*
Request for a meeting

Dear Minister Jordan:

The Coalition for the West Credit River is writing further to our letter dated 9 March 2021, in which we requested an opportunity to meet with you to discuss our [25 February 2021 request](#) to Minister Jonathan Wilkinson to designate the Town of Erin Urban Centre Wastewater Treatment Plant as a “Project” under subsection 9(1) of the *Impact Assessment Act*. Minister Wilkinson has committed to providing his response to our request by May 26, 2021.

The proposed Erin Wastewater Treatment Plant (Project) would release over 7 million liters of sewage effluent daily into the West Credit River, which is a relatively tiny receiver stream. This large volume of sewage effluent would be released downstream at the Wellington County Line into one of the last remaining native Brook Trout Populations in southern Ontario. This self-sustaining Brook Trout population is thriving because of the West Credit River’s unique and pristine coldwater habitat.

Last year, in the reach of river between the villages of Erin and Belfountain, there were over 400 redds sites in and around where the effluent discharge outfall pipe would be located. In fact, the Environmental Study Report indicated that “*Brook Trout redds were extremely abundant in the study reach and the study area provides habitat for this critical life state. The number of redds within the mixing zone, and within reach of dissolved oxygen sag were evaluated.*”¹

This quote from a Ministry of Environment (MOE) staff representative during a Local Planning Appeal Tribunal hearing provides a clear window into our concerns:

“By way of necessary background, the Town of Erin has approached the MOE several times in the past to discuss the potential of a municipal sewage treatment plant that would discharge to the West Credit River. Proposals have not been supported by MOE, due in large part to consideration of the need to protect the high-quality aquatic ecosystem in this branch of the Credit River. This branch of the Credit River provides cold water habitat to one of the few remaining self-sustaining wild brook trout populations in southern Ontario. The Credit River above Inglewood up to the bottom of the Niagara Escarpment World Biosphere Reserve is

¹ *Town of Erin Urban Center Wastewater Treatment Plant, ESR, Volume 2 of 3, Part 2, 4.2.1 Aquatic Ecology. PDF P-157/334.*

home to a thriving population of resident brown trout. Rainbow Trout and Atlantic Salmon are also at the Forks Provincial Park. Water quality in this branch of the Credit River is exceptional.”²

Here is a short [video of the West Credit River](#) showing the beauty and abundance of this unique Brook Trout population within a short drive of the GTA.

A high level of outrage has been expressed by the public in multiple forums:

- A [Road Rally Protest in the village of Erin](#),
- A Zoom [Public Community Meeting Event](#) with over 400 participants,
- A [Change.org petition with over 21,000](#) signatures,
- Letters of concern and support to the Impact Assessment Agency by:
 - The [Ontario Federation of Anglers and Hunters](#) (a membership of over 100,000),
 - [Jack Imhoff](#), a renowned Ontario Aquatic Ecologist and Watershed Scientist,
 - Gordon Miller (previously, the Environmental Commissioner of Ontario), and
 - 673 comments submitted to the Impact Assessment Agency in a one-week period.

The Coalition is again requesting an opportunity to meet with you online to answer any questions you may have, and to discuss how this Project could be improved to protect Brook Trout and their coldwater habitat. In the meantime, our ask of you, is to discuss this issue with your federal colleagues, and to reach out to Minister Wilkinson to request that he support our Designation Request.

Respectfully,



Judy Mabee
President, Belfountain Community Organization
Chair, Coalition for the West Credit River
(416) 670-3879

² LPAT, Wellington County Hearing Documents, 22 February 2013 letter from Dwayne Evans, Municipal Services Office-Western, Ministry of Municipal Affairs & Housing to Mark Van Patter, County of Wellington Planning and Development. P-174/653.