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To: Minister Jonathan Wilkinson EC.Ministre-Minister.EC@Canada.ca
Impact Assessment Registry CEAA.information.acee@Canada.ca
Mayor Allan Ails and Council: Allan.Ails@Erin.ca and Council@Erin.ca

Re: Need for a Federal Assessment, Erin Wastewater Treatment Plant Proposal

I do believe that the Town of Erin needs a wastewater treatment plant, but not the one proposed by the Town and its consultants. There appear to be a number of errors of omission in their Environmental Study Report and I will outline those below. I do believe that it is essential to have a separate independent assessment of this proposed plant in order to ensure the survival of the last healthy brook trout population and Redside dace population left in the Credit River watershed.

For my background, I have been involved in the study, assessment and management of the West Credit River in southern Ontario since I began my career in biology and ecology in 1979 with the Ontario Ministry of Natural Resources. I have walked, surveyed, electrofished and monitored the health of this stream in its entire length from the Forks-of-the-Credit to upstream of Hillsburgh, Ontario over the years. I was involved in the development of watershed planning in Ontario to help avoid the type of problem illustrated in this current proposed development. I also was involved in data collection and writing of the West Credit Subwatershed Study back in the 1990s and involved in doing a watershed wide study of the coldwater resources of the Credit called the Conservation Success Index several years ago.

Some key points for the need to undertake a Federal Environmental Assessment include:

- The Environmental Study Report failed to require effluent temperature limits and design objectives in spite of representatives from all three provincial regulatory agencies expressing the need. The stream will become too hot for these native species.
- The thermal signature of this temperature increase will not only affect the area immediately downstream of the outfall but will affect temperatures all the way downstream in the lower West Credit AND into the main Credit River.

- Sewage effluent will create an oxygen depletion zone and toxic plume that will likely extend on top of a major spawning site and several hundred meters downstream into Brook Trout nursery habitat.
- The Environmental Study Report reported that Brook Trout redds were extremely abundant in the study reach and the study area provides habitat for this critical life stage but the discharge characteristics do not account for the implications of discharge of 7 million liters per day (81 liters per second) into a small stream. As a result;
- Brook Trout habitat immediately downstream of the sewage discharge location will be made uninhabitable, including important spawning and rearing habitat. This will also have consequences all the way down the West Credit River to its confluence with the main Credit River.
- Cumulative effects discussed in the Environmental Study Report did not address any past, present and planned projects in the subwatershed on the environment, but instead only emphasized the benefits of the Project in replacing leaking septic systems in the community. As a result;
- The scope of the ESR was too narrow, despite biologists expressed concerns and as a result there was inadequate consideration of the expanded population growth of Erin and the toll it will take on the West Credit River's aquatic ecosystem AND human communities downstream. This appears to be planning by WWTP approach and not a proper planning process for reasonable growth for the community or its important and fragile environment. It needs a watershed approach as demonstrated by the Province as far back as the late 1980s with the development of the watershed planning process.

Southern Ontario has lost more than 80% of its resident, stream brook trout populations over the last 70 years (OMNRF report) and the populations of the Credit of Brook Trout and Redside Dace are slim in general and only healthy in this small sub-watershed. Reasonable growth is one thing but to again sacrifice our healthy environments as a result of a bad plan and inadequate design should not be allowed. A state-of-the-art design may not be required everywhere but we should not be destroying the last remaining healthy subwatershed for expediency. This small watershed and its human community deserve better.

For the reasons above, I am requesting the Minister consider designating this project for a proper Impact Assessment.

Sincerely,



Jack G. Imhof
Aquatic Ecologist/Watershed Scientist - retired