



Izaak Walton  
Fly Fishing Club



Greg Clark Chapter

15 March 2021

House of Commons Standing Committee  
Environment and Sustainable Development  
Sixth Floor, 131 Queen Street  
House of Commons  
Ottawa, ON, K1A 0A6, Canada

By email to:

Francis Scarpaleggia, MP, Chair, Lac-Saint-Louis, PQ – Francis.Scarpaleggia@parl.gc.ca  
Dan Albas, MP, Vice-Chair, Central Okanagan-Similkameen-Nicola, BC - Dan.Albas@parl.gc.ca  
Monique Pauze', MP, Vice-Chair, Repentigny, QC – Monique.Pauze@parl.gc.ca  
Yvan Baker, MP, Etobicoke, ON - Yvan.Baker@parl.gc.ca  
Lloyd Longfield, MP, Guelph, ON - Lloyd.Longfield@parl.gc.ca  
Raj Saini, MP, Kitchener Centre, ON - Raj.Saini@parl.gc.ca  
Ya'ara Saks, MP, York Centre, ON - Yaara.Saks@parl.gc.ca  
Peter Schiefke, MP, Vaudreuil-Solanges, PQ - Peter.Schiefke@parl.gc.ca  
Laurel Collins, MP, Victoria, BC - Laurel.Collins@parl.gc.ca  
Matt Jeneroux, MP, Edmonton Riverbend, AB – Matt.Jeneroux@parl.gc.ca  
Cathy McLeod, MP, Kamloops-Thompson-Cariboo, BC – Cathy.McLeod@parl.gc.ca  
Brad Redekopp, MP, Saskatoon West, SK – Brad.Redekopp@parl.gc.ca  
Isabelle Duford, Clerk of the Committee – ENVI@parl.gc.ca

Re: Request to appear before the Standing Committee on Environment & Sustainable Development  
West Credit River and Town of Erin Urban Centre Wastewater Treatment Plant

Dear Sirs and Madams:

The Coalition for the West Credit River is writing to you today to share our urgent concerns about an impending and grave threat to the ongoing health of the West Credit River and the sensitive coldwater environment and ecosystem that it sustains. The West Credit River flows through the Towns of Erin and Belfountain, a premium get-away for fly fishers and GTA urban dwellers seeking near-wilderness respite just a short drive northwest of Toronto.

The West Credit River is acknowledged as one of the last remaining wild and self-sustaining native Brook Trout fisheries in southern Ontario and is recognized for its environmentally significant ecosystem as part of a UNESCO World Biosphere protected area, well before it exits at the Forks of the Credit River.

Brook Trout are considered 'the Canary in the coal mine'. West Credit River Brook Trout are in grave danger of being irreparably harmed by 7.2 million liters of sewage effluent discharged daily from the proposed Town of Erin Urban Centre Wastewater Treatment Plant (the "Project"). This Project has received unconditional approval from the Minister of Environment, Conservation and Parks (MECP), through a streamlined process that was and continues to be deeply flawed. There is precious little time left to ensure the protection of this unique coldwater habitat and its temperature sensitive Brook Trout that rely on this cold and pristine riverine ecosystem for their very survival.

Permits and authorizations are imminent. There is little time left to Act. The federal government and Parliament have a key role to play in the future of West Credit River Brook Trout. If we do not act now, their populations will be decimated.

The Coalition is seeking to have this Project designated under the federal *Impact Assessment Act*. That process is now under way, and we await The Honourable John Wilkinson's decision.

We are confident that members of this Standing Committee (Committee) will share our concerns and view that federal government action must be taken to address what could truly be an environmental tragedy. As such, we would welcome the opportunity to appear before the Committee at the earliest date possible to outline our concerns and recommendations regarding measures to avoid any harm to the West Credit River. We would also welcome any action or support that members of the Committee are able to provide individually, including any advice you may offer as to other options we could pursue. What follows below is a brief overview of the situation, with links and references to documents that provide greater detail.

### **Background Summary:**

The Coalition for the West Credit River is made up of organizations consisting of the Belfountain Community Organization (BCO), West Credit River Watch (WCRW), Izaak Walton Fly Fishing Club (IWFFC), Trout Unlimited Canada - Greg Clark Chapter (TUC), Ontario Streams (OS), and Ontario Rivers Alliance (ORA).

On **25 February 2021, the Coalition made a Designation Request** for the proposed Project to be designated for a federal Environmental Assessment pursuant to subsection 9(1) of the *Impact Assessment Act (IAA)*. This greenfield Project may cause severe adverse and incidental environmental effects in an environmentally sensitive area of the West Credit River, in Peel Region. As described below, this Project has a number of potential adverse effects upon matters within federal jurisdiction and meets the criteria of public concern related to those effects.

The West Credit River subwatershed supports headwater tributaries of the Credit River and is considered the crown jewel of coldwater Brook Trout fisheries in southern Ontario. The entire footprint of the Project, including the network of underground sewers, will result in numerous crossings of first, second and third order streams. Additionally, the West Credit River feeds into the main Credit River at the Forks of the Credit Provincial Park. This area is part of the UNESCO Niagara Escarpment World Biosphere Reserve (Reserve), home to several sensitive fish species, including the endangered Redside Dace and Atlantic Salmon. Atlantic Salmon, historically extirpated, are being reintroduced as part of the broader Lake Ontario Atlantic Salmon Recovery Program. This Reserve begins within 1 km downstream of the Project's effluent discharge, and Redside Dace (*Schedule 1, Species at Risk Act, 2002*) are known to occupy the West Credit River within 4 km downstream of the effluent diffuser.

Brook trout are a sentinel species that signal cool, pristine waters and wild and healthy natural spaces. This fishery significantly adds to the economic and social fabric of the province, with Ontario fisheries contributing a total of approximately \$2.5 billion annually to the provincial economy.<sup>1</sup> MNRF's own documents predict that climate change will reduce the number of watersheds in Ontario with Brook Trout by 50% by 2050.<sup>2</sup> Trout streams draw anglers, which means economic activity that provides benefits locally, regionally, and nationally. Losing what is considered the crown jewel of Brook Trout fisheries in southern Ontario would be a huge loss to the social, recreational and economic fabric of the community.

---

<sup>1</sup> *Ontario's Provincial Fish Strategy: Fish for the Future. OMNRF, Fisheries Policy Section. ISBN #978-1-4606-5622-8. PDF P-8/68.*

<sup>2</sup> *The Conservation and Management of Brook Trout in Ontario: Past, Present, and Future, by Jacqueline Wood, Ph.D., Latonnell Conservation Symposium, November 2017.*

The Town of Erin is located northeast of Guelph, Ontario, in Wellington County. The main urban centres within the Town, are Erin Village and Hillsburgh. Currently, almost all residences in these two communities are serviced by individual private septic systems. The existing residential population is approximately 4,500. The Project was proposed by the Town to “address the wastewater issues within the communities and to facilitate growth”<sup>3</sup>. More commonly referred to as “Planning by Pipeline”.

*“The Servicing and Settlement Master Plan established a servicing limit of 6,000 persons; however, based on the use of “best available technology” at the Wastewater Treatment Plant, the updated ACS and the new effluent criteria, we have the potential to service a higher population. The Town of Erin Official Plan has identified 267.3 Ha (660 acres) of land available for residential, commercial and industrial growth in the Town. We have identified that full buildout of these growth areas, would add an additional 9,943 residents to the existing population of 4,616 residents, giving a total full build out potential population of 14,559.”<sup>4</sup>*

The preferred greenfield site is a 200-acre farm property, owned by Solmar Development Corporation (Solmar), and it slopes down towards the West Credit River. This large tract of land will be stripped of a considerable amount of its trees and vegetation for the build and could be a potential source of sediment loading into the watercourse.

On 8 August 2019 the Minister of MECP granted unconditional approval of the Environmental Study Report (ESR). The Project will be a communal wastewater collection system with treatment in a single wastewater treatment plant to be situated southeast of Erin village, with treated effluent to be discharged to the West Credit River at Winston Churchill Boulevard, in the Town of Erin, Ontario. See Appendix 1 – Location Maps.

Part II Order requests were filed by Judy Mabee, BCO, and Ann Seymour, WCRW; however, their concerns were not addressed to their satisfaction.

There has been great public outcry in the area with a number of newspaper articles<sup>5,6,7,8,9</sup> citing concern and anger about the planned Project, as well as media releases<sup>10,11</sup> and a **Cut the Crap, Keep the Credit petition signed by well over 17,000 citizens**. There was also a highly creative drive-by Road Rally for Residents and River held recently with concerned citizens driving their cars repeatedly around the Town of Erin in protest of the Project.<sup>12,13,14,15</sup> **Here’s a YouTube video that sums up the appetite for the proposed Project and population increase**. These are but a few of the many attempts by local citizens to voice their concerns and disgust for the Project.

The Mayor, a few Councillors and the 10 developers<sup>16</sup> waiting to develop these two Villages are about the only parties excited about the Project. Local residents are opposed to such excessive population growth and the major threat the Project poses to Brook Trout and their coldwater habitat in this relatively tiny West Credit River.

---

<sup>3</sup> [ESR, Volume 1 of 3, ES-1 Background and Objective, PDF P-5/526.](#)

<sup>4</sup> [ESR, Volume 1 of 3 – 10, PIC 1-Presentation Boards, Population and Flow Projections, P-277/526.](#)

<sup>5</sup> [Erin receives provincial approval for wastewater system, 4 September 2019, by Phil Gravelle, Wellington Advertiser.](#)

<sup>6</sup> [Groups concerned about Erin’s proposed wastewater plant effect on coldwater fish, 4 Nov. 2020, by Keegan Kozolanka, Guelph Today.](#)

<sup>7</sup> [My property is going to become an effluent corridor – Belfountain residents petition to halt Erin Wastewater Treatment Plant, 5 Nov. 2019, by Alexandra Heck, Toronto.com.](#)

<sup>8</sup> [Erin residents opposed to sewage plant take to the street in protest, 24 Feb. 2021, by Lorrie-Anne Little, Wellington Advertiser.](#)

<sup>9</sup> [Local coalition asks federal government to step in on Erin sewage plant, by Advertiser Staff, Wellington Advertiser.](#)

<sup>10</sup> [Media Release: Concerns over Brook Trout in the West Credit River, by Ontario Rivers Alliance, 29 October 2020.](#)

<sup>11</sup> [Media Release: Wastewater Treatment Plant spells doom for West Credit Brook Trout – Request for a federal review under the Impact Assessment Act, 25 February 2021.](#)

<sup>12</sup> [Erin man’s battle against wastewater plant leads to planned protest, 16 Feb. 21, by Keegan Kozolanka, Guelph Today.](#)

<sup>13</sup> [Erin’s residents protest proposed wastewater plant, 20 Feb. 2021, by Heather Sonora, CTV Kitchener News.](#)

<sup>14</sup> [Road Rally to Save the West Branch of the Credit, 20 Feb. 2021, by David Williams](#)

<sup>15</sup> [Erin Sewage Treatment Plant Protest, 20 Feb. 2021.](#)

<sup>16</sup> [Development Deal: Erin drafts deal with 10 developers to pay for entire wastewater treatment plant and trunk lines, 28 Oct. 2020, by Alexandra Heck.](#)

Unfortunately, many people and organizations were not aware of the proposed Project when it was going through the consultation and approvals process, due to inadequate outreach and consultation on the part of the proponent; however, there is great concern in the Town of Erin, and the downstream communities of Caledon over the potential affects it will have on this highly valued Brook Trout population in the West Credit River. This Coalition was formed as a result of those shared concerns, and the over **17,000 signatures on the Cut the Crap, Keep the Credit petition reflecting strong opposition to this Project.**

We have completed a thorough review of the ESR, with close examination of the proposed discharge of treated effluent into the West Credit River at Winston Churchill Boulevard, and a view to its potential impacts on Brook Trout and their coldwater habitat, both now and into the future. As we reviewed the ESR, there were several areas that we found lacked due diligence in addressing critical factors that will determine the fate of Brook Trout and Redside Dace, a Schedule 1 Species at Risk found just 4 km downstream of where 7.2 million litres of effluent would discharge daily into the relatively small West Credit River.

What our review found is detailed in the full **Designation Request**, and reports on serious areas of concern that if left unchecked will have deadly consequences. Areas of concern include:

- Inadequate mitigation of potential affects to fish and fish habitat,
- A SARA Schedule 1 species at risk,
- No provision for limits and design objectives for effluent temperature (thermal pollution),
- Dangerous effluent quality as it enters the stream (chemical pollution and oxygen depletion)
- Low ratio of stream flow to effluent flow,
- Inadequate attention to climate change and cumulative effects,
- Narrow and weak data used to predict future effluent temperature,
- Underestimated population growth capacity,
- Groundwater depletion leading to reduction in stream flows,
- Deficient notification and consultation with impacted landowners, and
- A basic lack of a clear and traceable path to understand how many key decisions and conclusions were made.

The Town of Erin, Ministry of Natural Resources & Forestry (MNRF), MECP and Credit Valley Conservation (CVC) all agree that *“the most productive Brook Trout spawning reaches and the best Brook Trout populations in the West Credit River are located downstream of Erin Village and the longest contiguous Brook Trout habitat in the Credit River watershed is the West Credit River between Erin and Belfountain.”*<sup>17, 18</sup> In fact, the ESR reports 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.”*<sup>19</sup>

This quote from a Ministry 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 home to a thriving*

---

<sup>17</sup> *ESR, Volume 2 of 3, Part 1, Appendix D, West Credit River Assimilative Capacity Study & Thermal Impact Assessment, by Hutchinson Environmental Sciences Ltd., December 6, 2017, Section 1.1, Study Area, PDF P-106/317.*

<sup>18</sup> *ESR, Volume 2 of 3, Part 2, Appendix H, Natural Environment Report by Hutchinson Environmental Sciences Ltd., April 23, 2018, Executive Summary, PDF P-68/334.*

<sup>19</sup> *ESR, Volume 2 of 3, Part 2, 4.2.1 Aquatic Ecology, PDF P-157/334.*

*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.”<sup>20</sup>*

The Coalition reached out by telephone and email to the Haudenosaunee Confederacy, Mississauga of the New Credit First Nation and the Six Nations of the Grand River Territory to notify them of our concerns; however, after three times leaving voice messages and email contact, no response was received.

Ontario’s provincial regulatory process has been streamlined and gutted over the last few years, which has limited the regulatory agencies in their scope and abilities to mitigate. The environmental assessment process is in a downward spiral and the public have lost confidence in the entire process. The Municipal Class Environmental Assessment (MCEA) process is not being applied with any rigor as it follows this government’s “Cutting Red Tape” mentality. This has placed well-meaning Agency staff under great pressure to bend to political will, and what comes out the other end of the process is a blind approval of any project that appears able to create a few jobs and tick another development win for this government.

A federal Designation and review would ensure a much more rigorous and comprehensive environmental assessment, tailor made to address many of our concerns about impacts within federal jurisdiction. A federal environmental assessment would include proper consultation of stakeholders and ensure that Brook Trout and Redside Dace have adequate mitigation and protection, unlike the very narrow and flawed MCEA process. It would also ensure proper monitoring, adaptive management and compliance limits.

If this provincial government gets the message that gutting environmental policy and legislation only erodes public confidence and slows down development, perhaps they will start reversing some of these more severe measures to bring back public confidence in the entire process.

The Impact Assessment Agency has acknowledged receipt of our Designation Request and it is now available for comment on the **IAA Registry portal here – Reference No. 81434.**

Please do not hesitate to contact the Coalition for the West Credit River if you have any questions or require additional information. We look forward to your response.

Yours in conservation,



Judy Mabee, Chair  
Belfountain Community Organization  
[Judy.Mabee@gmail.com](mailto:Judy.Mabee@gmail.com)



Doug Forder, General Manager  
Ontario Streams  
[Doug.Forder@OntarioStreams.on.ca](mailto:Doug.Forder@OntarioStreams.on.ca)



Ann Seymour  
West Credit River Watch  
[ASeymour@live.ca](mailto:ASeymour@live.ca)



Linda Heron, Chair  
Ontario Rivers Alliance  
[LindaH@OntarioRiversAlliance.ca](mailto:LindaH@OntarioRiversAlliance.ca)

---

<sup>20</sup> 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.

*David Williams*

David Williams  
Izaak Walton Fly Fishing Club  
[Taterhead3148@gmail.com](mailto:Taterhead3148@gmail.com)



John Monczka  
Trout Unlimited Canada – Greg Clark Chapter  
[J.Monczka@gmail.com](mailto:J.Monczka@gmail.com)

Cc: Agency - [CEAA.information.acee@Canada.ca](mailto:CEAA.information.acee@Canada.ca)  
Honourable John Wilkinson, Minister of ECCC - [EC.Ministre-Minister.EC@Canada.ca](mailto:EC.Ministre-Minister.EC@Canada.ca)  
Honourable Catherine McKenna, Minister of Infrastructure – [Inf.Minister-Ministre.Infc@canada.ca](mailto:Inf.Minister-Ministre.Infc@canada.ca)  
Honourable Bernadette Jordan, Minister of DFO – [Min@dfo-mpo.gc.ca](mailto:Min@dfo-mpo.gc.ca)  
William Glass, Fish and Fish Habitat Protection Program, DFO - [William.Glass@dfo-mpo.gc.ca](mailto:William.Glass@dfo-mpo.gc.ca)  
Michael Chong, MP, Wellington-Halton Hills – [Michael.Chong@parl.gc.ca](mailto:Michael.Chong@parl.gc.ca)  
Kyle Seeback, MP, Dufferin-Caledon – [Kyle.Seeback@parl.gc.ca](mailto:Kyle.Seeback@parl.gc.ca)  
Jagmeet Singh, MP, NDP Party Leader - [Jagmeet.Singh@parl.gc.ca](mailto:Jagmeet.Singh@parl.gc.ca)  
Annamie Paul, Green Party Leader – [info@annamiepaul.ca](mailto:info@annamiepaul.ca)