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Izaak Walton  
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Trout Unlimited Canada



Greg Clark Chapter

31 August 2021

Mayor Allan Alls  
Town of Erin  
5684 Trafalgar Road  
Hillsburgh, ON  
N0B 1Z0

By email: [Allan.Alls@Erin.ca](mailto:Allan.Alls@Erin.ca)

Re: Proposed Erin Wastewater Treatment Plant  
13 July 2021 - Meeting Follow-up

Dear Mayor Alls:

As a follow-up to our meeting of July 13, the Coalition for the West Credit River has identified the following list of questions that remain outstanding (the meeting was taped with the permission of Mayor Alls):

Mark Heaton shared the Impact Assessment Agency Canada (IAAC) Analysis Report, Annex 1, under Effects and Mitigation Proposed by the Proponent and the Agency's Findings, where it listed several commitments, including, "*The Proponent would mitigate the potential effects of effluent through project design and standard measures including: a commitment to adhere to a recommended upper temperature limit of 19°C in effluent discharge*"<sup>1</sup>.

Mayor Alls responded, "*I don't think we made any commitment on it, did we Nick?*" Nick Colucci responded, "*No, we don't have an effluent requirement but, recommended doesn't mean we are going to adhere to 19, it's a recommended number. So, in our documentation there is something about the dissolved oxygen, where at a certain level of dissolved oxygen then that's the temperature to maintain the level of dissolved oxygen, it's a certain temperature. So, that could be where that is coming from. I will have to confirm with WSP about that*".<sup>2</sup>

**Q-1:** How did the IAAC get the confirmation that the Town of Erin made a commitment to adhere to a recommended upper temperature limit of 19°C in effluent discharge?

Mark, "*At the end of the day we need to protect the brook trout. All we're looking for is a commitment from the Town of Erin to work together with the Coalition, the Town of Caledon and the Credit Valley Conservation Authority to shoot for 19°C. If we start hitting above 19°C we need to start thinking about Plan B – that's got to be something – some sort of thermal mitigation. It may not happen for 5 years, but that's what we're looking for, a commitment*".<sup>3</sup>

Mayor Alls responded, "*Well, I don't see why we would not address the issue for that. Now I probably won't be here, but any Council or responsible legislative body would have to look at that*".<sup>4</sup>

Mayor Alls, "*Yes, I don't see why we couldn't work together*".<sup>5</sup>

**Q-2:** Will the Town of Erin commit to working with the Coalition, the Town of Caledon and the CVC to come up with a thermal mitigation plan in the event stream and/or effluent temperatures start hitting above 19°C?

Mark, *“So, back to the Addendum. The ESR said the Addendum would be required after site selection, and Town Council Minutes of August 2020 said they were going to do an Addendum. So, what’s the status of the Addendum?”*<sup>6</sup>

Colucci, *“Ah, from the best of my knowledge it was determined that we don’t need one because we picked the preferred site. So, from our discussion with MOECP, we don’t need one.”*<sup>7</sup>

Mark, *“Is there any correspondence in the project file to confirm that?”*

Colucci, *“Ah, I’m not sure, I’ll have to check.”*<sup>8</sup>

**Q-3:** As the Solmar site was not selected until a year after Ministerial Approval of the ESR, has the Town of Erin confirmed with the MECP whether correspondence exists in the project file confirming that there is no requirement for an Addendum to the ESR, as per compliance with the *Environmental Assessment Act* and the Municipal Class Environmental Assessment?

Mark, *“I’m just looking at commitments from the Town in terms of engaging the Coalition, as well as the Town of Caledon and the Credit Valley Conservation Authority in its Adaptive Management framework that’s going to be part of your ECA? So, your ECA is what’s required for the facility from the MOE, and it has got to have an adaptive management framework. That hasn’t been fleshed out yet, and it’s been identified, so this collaboration would be on that, for the agencies and the Coalition. Would you be willing to commit to that at this time?”*<sup>9</sup>

Colucci, *“I don’t think we can. I mean, you know, our approval body is the MOE. Anything that’s part of the ECA, they will be approving it. So, we can’t allow any other approval body.”*<sup>10</sup>

**Q-4:** How can the Town of Erin, the Town of Caledon, the CVC and the Coalition work together to develop an adaptive management plan to protect the West Credit River brook trout?

Colucci, *“Part of the outfall is in the [CVC] regulated area, but a lot of it is not, so we are working with them to obtain those approvals. I will have to talk to our consulting team to see if there is a possibility to have some review of that process with you guys, and I’ll have to get back to you about that.”*<sup>11</sup>

**Q-5:** Has Mr. Colucci met with the consulting team to determine whether it is possible for the Coalition to have input into the Adaptive Management Strategy and framework process?

**Q-6:** Is the Town moving forward on the following IAAC recommendations?

- Natural Resources Canada recommended that *“additional brook trout spawning surveys could be carried out to identify potential changes relevant to protecting brook trout populations that could help inform mitigation strategies”*<sup>12</sup>; and
- Environment and Climate Change Canada recommended *“that a focused follow-up thermal risk study be considered to verify the predictions of the models to ensure that Brook Trout and other important species are protected”*<sup>13</sup>?

**Q-7:** The WSP final plant design must be complete if the Town has put the wastewater treatment plant out to tender. Will the Town of Erin make the final plant design available to the Coalition?

We look forward to your response.

Regards,



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Chair, Coalition for the West Credit River  
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<sup>1</sup> Analysis Report – Whether to Designate the Erin Wastewater Treatment Plant Project in Ontario Pursuant to the Impact Assessment Act, May 2021, Annex 1, Analysis Summary Table, P-10.

<sup>2</sup> 13 July 2021 Meeting between Mayor Allan Ails, Nick Colucci, Judy Mabee and Mark Heaton – audio recording at 28:52.

<sup>3</sup> 13 July 2021 Meeting between Mayor Allan Ails, Nick Colucci, Judy Mabee and Mark Heaton – audio recording at 32:55.

<sup>4</sup> 13 July 2021 Meeting between Mayor Allan Ails, Nick Colucci, Judy Mabee and Mark Heaton – audio recording at 33:26.

<sup>5</sup> 13 July 2021 Meeting between Mayor Allan Ails, Nick Colucci, Judy Mabee and Mark Heaton – audio recording at 37:20.

<sup>6</sup> 13 July 2021 Meeting between Mayor Allan Ails, Nick Colucci, Judy Mabee and Mark Heaton – audio recording at 47:39.

<sup>7</sup> 13 July 2021 Meeting between Mayor Allan Ails, Nick Colucci, Judy Mabee and Mark Heaton – audio recording at 48:00.

<sup>8</sup> 13 July 2021 Meeting between Mayor Allan Ails, Nick Colucci, Judy Mabee and Mark Heaton – audio recording at 48:10.

<sup>9</sup> 13 July 2021 Meeting between Mayor Allan Ails, Nick Colucci, Judy Mabee and Mark Heaton – audio recording at 50:46.

<sup>10</sup> 13 July 2021 Meeting between Mayor Allan Ails, Nick Colucci, Judy Mabee and Mark Heaton – audio recording at 51:43.

<sup>11</sup> 13 July 2021 Meeting between Mayor Allan Ails, Nick Colucci, Judy Mabee and Mark Heaton – audio recording at 52:13.

<sup>12</sup> From NRC – Federal Authority Advice Record for the Designation Request of the Erin WWTPP – Ref. 11.

<sup>13</sup> From ECCC – Additional Information for the Designation Request of the Erin WWTPP – May 5, 2021, Ref. 25.