

FOR OFFICE USE ONLY		Attention: Regional Clerk Regional Municipality of Peel 10 Peel Centre Drive, Suite A Brampton, ON L6T 4B9 Phone: 905-791-7800 ext. 4582 E-mail: council@peelregion.ca	
MEETING DATE YYYY/MM/DD 2022/06/09	MEETING NAME Regional Council		
DATE SUBMITTED YYYY/MM/DD 2022/06/03			
NAME OF INDIVIDUAL(S) Mark Heaton			
POSITION(S)/TITLE(S) Senior Biologist			
NAME OF ORGANIZATION(S) Coalition for the West Credit River			
E-MAIL mark.heaton@ontariostreams.on.ca		TELEPHONE NUMBER (416) 993-1295	EXTENSION
INDIVIDUAL(S) OR ORGANIZATION(S) ADDRESS [REDACTED]			
REASON(S) FOR DELEGATION REQUEST (SUBJECT MATTER TO BE DISCUSSED) The Coalition is requesting the opportunity to delegate the region to identify the improvements that must be incorporated into the ECA as they are crucial to the health of this highly valued native Brook Trout population and the West Credit River ecosystem, which is a pristine Policy 1 coldwater stream.			
A formal presentation will accompany my delegation <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Presentation format: <input checked="" type="checkbox"/> PowerPoint File (.ppt) <input type="checkbox"/> Adobe File or Equivalent (.pdf) <input type="checkbox"/> Picture File (.jpg) <input type="checkbox"/> Video File (.avi,.mpg) <input type="checkbox"/> Other <input type="text"/>			
Additional printed information/materials will be distributed with my delegation : <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Attached			
Note: Delegates are requested to provide an electronic copy of all background material / presentations to the Clerk's Division if possible 72 hours, but not less than 24 hours, prior to the meeting start time. Delegation requests and/or materials received after 9:30 a.m. on the Wednesday prior to the meeting will not be provided to Members. Delegation requests received less than 72 hours prior to the meeting start time that relate to an item listed on the agenda will be added to the agenda only upon the approval of Council or Committee at the meeting. Delegates should make every effort to ensure their presentation material is prepared in an accessible format. Once the above information is received in the Clerk's Division, you will be contacted by Legislative Services staff to confirm your placement on the appropriate agenda. In accordance with Procedure By-law 56-2019, as amended, delegates appearing before Regional Council or Committee are requested to limit their remarks to 5 minutes and 10 minutes respectively (approximately 5/10 slides). Delegations may only appear once on the same matter within a one-year period, unless a recommendation pertaining to the same matter is included on the agenda within the one-year period and only to provide additional or new information.			
Please save the form to your personal device, then complete and submit via email attachment to council@peelregion.ca			

Notice with Respect to the Collection of Personal Information
(Municipal Freedom of Information and Protection of Privacy Act)

Personal information contained on this form is authorized under Section 5.4 of the Region of Peel Procedure By-law 56-2019, as amended, for the purpose of contacting individuals and/or organizations requesting an opportunity to appear as a delegation before Regional Council or a Committee of Council. The completed Delegation Request Form will be redacted and published with the public agenda. The Procedure By-law is a requirement of Section 238(2) of the Municipal Act, 2001, as amended. Please note that all meetings are open to the public except where permitted to be closed to the public under legislated authority. All Regional Council and Committee meetings are live streamed via the internet and meeting videos are posted and available for viewing subsequent to those meetings. Questions about collection may be directed to the Manager of Legislative Services, 10 Peel Centre Drive, Suite A, 5th floor, Brampton, ON L6T 4B9, (905) 791-7800 ext. 4462.

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Izaak Walton
Fly Fishing Club



Trout Unlimited Canada



Greg Clark Chapter

3 June 2022

Regional Municipality of Peel
10 Peel Centre Drive, Suite A
Brampton, ON L6T 4B9

Attention: Regional Clerk

By Email: Council@PeelRegion.ca

Re: Delegation Request - Erin Water Resource Recovery Facility

Dear Region of Peel Council Members:

The Coalition for the West Credit River (Coalition) is requesting an opportunity for Mark Heaton of Ontario Streams to delegate to Council, including a slide presentation, at your next Regional Council Meeting, which I understand will take place on 9 June 2022.

Background Information:

The Coalition is very appreciative of your strong support in recommending to the Honourable David Piccini, Minister of Environment, Conservation Parks (MECP) and Mayor Allan Aills, Town of Erin, that our draft Monitoring and Adaptive Management Plan be integrated into the Environmental Compliance Approval (ECA). As you are likely aware, the ECA for the Erin Water Resource Recovery Facility was approved on 3 May 2022 by Aziz Ahmed, P.Eng., MECP Manager of Municipal Water & Wastewater Permissions, appointed for the purposes of Part II.1 of the *Environmental Protection Act*.

The Coalition was extremely pleased and appreciative that Mr. Ahmed and his staff worked with our Technical Team and incorporated some of our recommendations into the approved ECA, which included requiring an effluent cooling system to cool and maintain effluent temperature at 19°C or below, to notify any downstream water users that could be adversely impacted by a Bypass Event, ensure quarterly sewage Bypass Event reports are available to the public, annual performance reports published to the Town of Erin's website, and real-time online effluent temperature monitoring. However, when we responded to Mr. Ahmed with some key revisions to their draft ECA on 2 May, we were disappointed and concerned that in spite of a comment deadline not being communicated, none of those revisions were included in the approved ECA that was issued the next day.

We feel these improvements must be incorporated into the ECA as they are crucial to the health of this highly valued native Brook Trout population and the West Credit River ecosystem, a pristine Policy 1 coldwater stream. We are again requesting Peel Council's support to recommend incorporating the following improvements into the ECA:

Recommendation 1: Section 11.1 - The effluent temperature objective be 17°C from July 1 to September 30 and 9°C from October 1 to November 30.

Rationale: The summer effluent temperature objective is set at or below 19°C; however, the cooling system should run continuously until the effluent entering the final pumping station reaches 18°C, but preferably even lower to 17°C to ensure stream temperature stays at or below 19°C. This will ensure Brook Trout and their sensitive biological temperature requirements are met. Additionally, our 2021 effluent temperature study of 5 local wastewater treatment facilities revealed that elevated effluent temperatures persist right through spawning season and into mid-November. This information can be shared with you and your staff upon request.

Recommendation 2: Section 11. 2 (a) and Schedule C - The Dissolved Oxygen compliance limit in the final effluent be increased from 4 mg/L to a minimum of 6 mg/L, but preferably 9.5 mg/L as per the [Canadian Council of Ministers of the Environment Guidelines](#).

Recommendation 3: Section 11. 2 (a) be amended by removing the crossed-out text and adding the underlined text to read as follows: *“If dissolved oxygen level in the effluent drops below 4 mg/L 9.5 mg/L, and ~~sustained for more than 12 hours~~, air shall be introduced into the effluent at the final effluent pumping station to bring the dissolved oxygen in the effluent above 4 ~~mg/L~~ 9.5 mg/L...”*

Rationale for Recommendations 2 & 3: Brook Trout cannot persist in water that has a dissolved oxygen concentration of 4 mg/L, let alone sustain themselves at an even lower dissolved oxygen level for 12 hours.

Recommendation 4: Section 10.6 - The ECA specify that CVC post all water quality and effluent temperature monitoring data to their website in real-time so the public can be assured of the health and safety of the Brook Trout and West Credit River ecosystem.

Rationale: The ECA currently allows a 2-week time delay to Quality Control the real-time monitoring data before it's posted to the Town's website. This is not real-time data for the public, nor does it provide transparency in the operation of the plant. The CVC currently provides all data at its water quality stations in real-time on its website and quality controls the data with an update after it is released. These stations should be no different.

Recommendation 5: Sections 5.7 & 6.7 be amended by removing the crossed-out section and adding the underlined text, to read as follows: *“The Owner shall develop a notification procedure in consultation with the District Manager, SAC and CVC, and notify ~~the public and downstream water users that may be adversely impacted by~~ all those who have registered on the Town of Erin website to receive Bypass Event emails in real-time in the event of an Overflow or Bypass Event.”*

Rationale: The wording of the current text allows the “Owner” a judgement call on whether downstream water users may be adversely impacted by a Bypass or Overflow event. Only the property owner and the Brook Trout will know whether he/she has been adversely impacted by a bypass. A highly effective model for the Town of Erin to follow is the [City of Sudbury Bypass Alerts](#), where the public can register on the City's website to receive email notification of sewer Bypass Alerts or wastewater overflows in real-time. It is a very successful model and has been in use since 2014.

Recommendation 6: The two downstream monitoring stations be located at Winston Churchill Boulevard (WCB), at the downstream edge of the culvert, and 200m downstream.

Rationale: The current planned locations for downstream monitoring stations in Schedule D, Surface Water, are at 150m and 700m downstream of the effluent diffuser. At 200m downstream, the effluent should be fully mixed. A prime Brook Trout spawning and nursery habitat lies between the downstream edge of the WCB culvert, at approximately 35m from the diffuser, and extends

to approximately 200m downstream of the diffuser. Therefore, the monitoring stations will be more relevant if positioned to effectively monitor and protect this sensitive spawning and nursery habitat located within 200m of the diffuser. Our technical experience and knowledge from working and fishing in the West Credit River is why our understanding of this system can be very valuable as a participating and commenting stakeholder.

Recommendation 7: The Coalition be included in the drafting of the Operations & Maintenance Manual (OMM) as a commenting and participating stakeholder.

Rationale: The Coalition's Technical Team (Team) is a value-added commenting stakeholder, with a proven track record of working with the MECP on technical issues that have resulted in a number of recommendations in our draft Monitoring and Adaptive Management Plan being incorporated into the ECA in one form or another. The Team also collected effluent temperature data at 5 local wastewater treatment facilities over the summer of 2021, and that data was used by MECP and CVC in the preparation of the ECA. The CVC has encouraged our Team to approach the Town of Erin for our involvement in the OMM. We would appreciate any support from Peel Councillors to encourage the Town of Erin to invite our Team to participate fully in the OMM.

The new effluent cooling system is an appropriate means to alleviate concerns regarding the long-term implications of the new wastewater treatment plant on Brook Trout in the West Credit River. As it will be a new approach for effluent temperature mitigation, we recommend that all outside clarifier tanks also be shaded to help keep effluent cool during the treatment process. This will improve cooling efficiency and save on chiller operating costs.

We thank you for your consideration and look forward to your response.

Respectfully,



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

Cc: Mayor Allan Thompson, Town of Caledon
Tom Adams, Chair, Credit Valley Conservation
Quentin Hanchard, CAO, Credit Valley Conservation

Erin Wastewater Treatment Plant Update

Coalition for the West Credit River

9 June 2022



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Greg Clark Chapter



Izaak Walton
Fly Fishing Club





Photo: Steven Noakes

Goals

Working to address the Erin WWTP:

- ▶ Potential to impact water quality of the West Credit River
- ▶ Protection and improvement of habitat and stream resilience
- ▶ Conservation of West Credit River Brook Trout



Photo: Steven Noakes

Current Project Status

- ▶ **Environmental Compliance Approval issued by MECP**
 - ✓ Chiller system required for effluent prior to discharge
 - ✓ Effluent discharge temperature objective is 19°C
 - ✓ Real-time water quality monitoring program with CVC
- ▶ **Construction initiated**
- ▶ **Effluent Cooling System design underway**
 - ▶ Addendum to ECA required for Effluent Cooling System
- ▶ **Operations and Maintenance Manual development underway**

ECA Consultation

Insufficient stakeholder consultation turn-around time:

- ▶ Coalition was provided draft ECA on April 19th
 - ▶ Submitted recommendations on May 2nd to ensure Brook Trout's sensitive biological requirements are met
 - ▶ None of these recommendations were included in the ECA
- ▶ Region of Peel was provided draft ECA on April 20th with a comment deadline of April 27th
- ▶ MECP issued ECA on May 3, 2022

Coalition Recommendations

Recommendation 1:

Effluent temperature objective be 17° C from July 1 to September 30 and 9° C from October 1 to November 30.

Rationale:

Cooling system should run continuously until the effluent entering the final pumping station reaches 18° C, but preferably even lower to 17° C to ensure summer stream temperature stays at or below 19° C.

Elevated effluent temperatures persist right through spawning season and into mid-November.

Coalition Recommendations

Recommendation 2:

Dissolved Oxygen compliance limit in the final effluent be increased from 4 mg/L to a minimum of 6 mg/L, but preferably 9.5 mg/L as per the [Canadian Council of Ministers of the Environment Guidelines](#).

Recommendation 3:

If dissolved oxygen level in the effluent drops below 9.5 mg/L, air shall be introduced into the effluent at the final effluent pumping station to bring the dissolved oxygen in the effluent above 9.5 mg/L

Rationale:

Brook Trout cannot survive in water with dissolved oxygen at 4 mg/L. Induced responses include respiratory gasping, avoidance and feeding cessation when below 5 mg/L



Photo: Steven Noakes

Coalition Recommendations

Recommendation 4:

ECA specify that CVC post all water quality and effluent temperature monitoring data to their website in real-time so the public can be assured of the health and safety of the Brook Trout and West Credit River ecosystem.

Rationale:

ECA currently allows a 2-week time delay to Quality Control the real-time monitoring data before it's posted to the Town's website. This is not real-time data for the public.

Coalition Recommendations

Recommendation 5:

ECA be amended to read as follows: “The Owner shall develop a notification procedure in consultation with the District Manager, SAC and CVC, and notify all those who have registered on the Town of Erin website to receive Bypass Event emails in real-time in the event of an Overflow or Bypass_Event.”

Rationale:

Wording of the current text allows the “Owner” a judgment call on whether downstream water users may be adversely impacted by a Bypass or Overflow event. A highly effective model for the Town of Erin to follow is the [City of Sudbury Bypass Alerts](#), where the public can register on the City’s website to receive email notification of sewer Bypass Alerts or wastewater overflows in real-time.



Coalition Recommendations

Recommendation 6:

The two downstream monitoring stations be located at Winston Churchill Boulevard (WCB), at the downstream edge of the culvert, and 200m downstream.

Rationale:

Monitoring stations will be more relevant if positioned to effectively monitor and protect the sensitive spawning and nursery habitat located within 200m of the effluent discharge location.



Coalition Recommendations

Recommendation 7:

Coalition be included in the drafting of the Operations & Maintenance Manual as a participating and commenting stakeholder.

Rationale:

Coalition's Technical Team (Team) is a value-added commenting stakeholder, with a proven track record of working with the MECP on technical issues that have resulted in a number of recommendations in our draft Monitoring and Adaptive Management Plan being incorporated into the ECA in one form or another.

How Peel Region Can Help

1. Write a letter to the Minister of Environment, Conservation and Parks supporting the Coalition's recommendations to improve the ECA
2. Write a letter to the Town of Erin requesting that the:
 - a. General public has access to monitoring data in real-time through the CVC website portal consistent with other real-time stations
 - b. Coalition be considered a participating and commenting stakeholder in the preparation of the draft OMM
 - c. Region of Peel be notified, in real time, of Overflow or Bypass-Events

An aerial photograph of a river winding through a dense forest of evergreen trees. The river is dark and reflects the surrounding greenery. The trees are a mix of deep green and lighter, yellowish-green, suggesting a mix of species or perhaps the onset of autumn. The river flows from the top center towards the bottom of the frame, with several bends. The forest is thick and covers the entire area surrounding the river.

THANK YOU