

TABLE 2 – RESPONSE 2 - IAAC INFORMATION REQUEST

PROPONENT:	Town of Erin
PROJECT TITLE:	Proposed Wastewater Treatment Plant & Collection System
PROJECT LOCATION:	Village of Erin and Community of Hillsburgh
PREPARED BY:	Joe Mullan, P.Eng. Ainley Group

The Environmental Study Report (ESR) for the Urban Centre Wastewater Servicing Class EA (October 2019) is cited throughout this response and can be retrieved from the Town of Erin website at https://wastewater.erin.ca/study_documents. The document is separated into 3 volumes.

Required Information	Response or Attachments
<p>1.Information about key project activities, maps and layouts of the location of project components, land tenure, zoning, and estimated timelines for planning, construction, operation, decommissioning and abandonment.</p>	<p>Please refer to Figure 1 – Study Area on page 4 of the main body of the ESR (Volume 1 of 3) for a layout of the project boundaries. These boundaries encompass the existing urban areas within the Town of Erin including the Village of Erin and the Community of Hillsburgh and also include areas designated for growth within the Town of Erin Official Plan. The growth areas identified through the ESR are in accordance with the growth policies set out by Wellington County Official Plan (Upper Tier Municipality) and in accordance with the Provincial Growth Plan and the associated Provincial Policy Statement (PPS)</p> <p>As part of the ESR a Technical Memorandum containing an evaluation of the existing private sewage systems (septic systems) within the two existing communities was completed and is included in Appendix B – Septic System Overview of the ESR (Volume 2 of 3). The following recommendation is contained on page 31 of this Technical Memorandum in Appendix B:</p> <p><i>Based on the analysis of the four determining factors it was found that all decision areas in Erin except for Northeast Erin and part of South Erin should be connected to the proposed communal wastewater collection and treatment system, as shown in Appendix D1. In Hillsburgh, all decision areas should be connected except for Upper Canada Drive as shown in Appendix D2. In addition to the four determining factors that were used to decide which areas are to be connected, it should also be recognized that both communities have a high density of septic systems many of which are in close proximity to surface waters.</i></p> <p>The Drawings D1 & D2 are also included on page 24 & 25 of the ESR (Vol. 1 of 3) highlighting the recommended areas of the existing communities of Erin & Hillsburgh that are to be serviced with the planned Municipal wastewater system.</p> <p>Section 13.1 - Wastewater Collection System Evaluation (Page 50 to 65) of the ESR (Vol. 1 of 3) includes a detailed evaluation of alternative servicing alternatives, with the preferred alternative for existing communities and growth areas shown on Figures 8 to 12 on pages 56 to 61 of the ESR. In conjunction with the completion of the ESR the Town retained Dillon Consulting to undertake a Growth Management Strategy for the Town of Erin. Within the Growth Management Strategy, Dillon Consulting and dated October 2019 reviewed all potential development areas and identified the Preferred Growth Scenario as shown on Figure 6 (see Attachment 4) which was amended in Dec 2019 as shown on the attached marked up Figure 2 (see Attachment 5). The servicing of the Preferred Growth Scenario with a communal sewage system remained the same as defined in the ESR.</p> <p>Section 11.4 (Page 41-45) of the ESR (Volume 1 of 3) contains a detailed evaluation of alternative sites for the wastewater treatment plant and</p>

TABLE 2 – RESPONSE 2 - IAAC INFORMATION REQUEST

Required Information	Response or Attachments
	<p>outfall locations, following which a preferred alternative was identified on Figure 6 on page 45 of the ESR.</p> <p>Since completion of the Provincial Class Environmental Assessment process and approval of the ESR by the Ministry of Environment, Conservation and Parks (MECP) the Town has proceeded to the implementation stage.</p> <p>The Town has expended considerable efforts to secure funding for all project components including servicing the existing communities and growth areas in support of the recommended alternative in the ESR. Through these negotiations the Town has recently executed Agreements with six (6) private development groups for the Design and Construction of Wastewater Treatment Plant and associated Trunk Collection System. In conjunction with the execution of these agreements the six developers have provided the Town with more than \$85 million in securities and in return the Town is bound to proceed with the design and construction required wastewater infrastructure and have it commission by the summer of 2023.</p> <p>Therefore, to comply with the commitments the Town proceeded, in the summer of 2020, to award a multi-million-dollar contract for Engineering Design of the Wastewater Treatment Plant which is currently proceeding. Further it is anticipated that a tender for the construction of the Wastewater Treatment Plant (with an estimated construction value of \$50Million) will be issued in the spring of 2021 with ultimately commissioned in early 2023. The Town is also in the process of awarding another multi-million-dollar contract for Engineering Design of the Wastewater Trunk Collection System and anticipates that the design will begin this summer with the construction be completed in the summer of 2023.</p> <p>With the Town proceeding with these critical initiatives for the engineering design and subsequent construction of the necessary wastewater infrastructure the Town will be in a position to service the existing communities and approved growth areas by the summer of 2023. As the existing communities are serviced with the new municipal wastewater system, the existing private septic systems and sewage holding tanks will be decommissioned in accordance with Provincial requirements.</p>
<p>2.A list of all regulatory approvals (federal, provincial, municipal, other) and any federal financial assistance that would be required for the Project and the associated project components or activities.</p>	<p>Please refer to the attached table for a list of approvals that will be required from federal, provincial and municipal authorities during the implementation stage of this project.</p>
<p>3.a)For each licence, permit, authorization or approval that would be required, please provide the following information:</p> <ul style="list-style-type: none"> i. Name of the licence, permit, authorization or approval, the associated legislative framework, and the responsible jurisdiction. ii. Whether it would involve an assessment of any of the effects outlined in Request #1, and if so, a general description of the assessment that you intend to undertake. Would conditions be set and if yes, what effects would those conditions address? iii. Whether public and/or Indigenous consultation would be required and if yes, provide information on the approach you intend to take (if any steps have been taken, please provide a summary, including issues raised as well as your 	<ul style="list-style-type: none"> i. The Town is presently in the early stages of implementation and has not yet applied for approvals required for the project but is in contact with approval authorities to ensure that applications are in line with their requirements. Please refer to the attached table for a list of approvals and the responsibilities of each authority. ii. The Town intends to proceed with the project as outlined within the recommended alternative in the Class EA. All mitigation measures outlined within the Class EA are included within implementation plans. Studies on protection of groundwater and the natural environment around the wastewater treatment plant, trunk sewers and sewage pumping stations are all included in the Town’s implementation plans aimed at minimising environmental impacts. Stage 2 archaeological studies are required as part of the implementation plan and this has already been conducted for the wastewater treatment plant site. iii. The Town plans to continue with a comprehensive public communications plan throughout the project implementation phase. The Town continues to update the public and interested parties through Council and the Town website. As the design of components progresses the implementation plans include full Public Information Centres (PIC) for both the Wastewater Treatment Plant and Trunk Sewer System. These PICs will address all potential impacts from the project as well as outlining how mitigating measure will be minimise the impact on the natural and social environment. Indigenous groups will form an integral part of this public consultation plan.

TABLE 2 – RESPONSE 2 - IAAC INFORMATION REQUEST

Required Information	Response or Attachments
<p>responses). If there is an issues resolution process associated with the consultation, please describe it.</p>	
<p>3.b) Confirm whether any licence, permit, authorization or approval listed above would address any of the following matters raised by the requestor, and describe how they would address the matters, including the benchmarks or standards that you intend to meet (or would be expected to meet), and any planned mitigation or follow-up measures:</p> <ul style="list-style-type: none"> i. Potential impacts to fish and fish habitat (for instance in the West Credit River and Credit River), including <ul style="list-style-type: none"> a. impacts to Brook Trout and cold water habitat from effluent discharge (such as water temperature increase, dissolved oxygen depletion, ammonia and chloride toxicity); b. cumulative impacts to Brook Trout and cold water habitat from effluent combined with climate change, population growth and increased groundwater pumping; c. impacts to reintroduced Atlantic Salmon; and d. aquatic ecosystems in the Forks of the Credit Provincial Park and UNESCO Niagara Escarpment World Biosphere Reserve; ii. Potential impacts on aquatic species at risk and their habitat, including Redside Dace; iii. Potential impacts on terrestrial species at risk and migratory birds; iv. Potential impacts on social and economic conditions, including related to angling; v. Potential impacts on Indigenous peoples from changes to the environment; vi. Potential cumulative effects, in general; vii. Perceived lack of transparency and traceability in decision-making; and viii. Perceived lack of public consultation. 	<p>The MECP Environmental Compliance Approval (ECA) for Sewage Works will address potential impacts to fish and fish habitat by listing the effluent criteria (objectives and limits) that ensure that concentrations of un-ionized ammonia and dissolved oxygen will meet the Provincial Water Quality Objectives (PWQO) in the West Credit River outside of the mixing zone. Under 7Q20¹ conditions the predicted mixing zone extends some 152 m downstream of the outfall after which all PWQO's will be met within the river. The ECA will define monitoring of the effluent (parameters, frequency and approach), which will include, but not limited to, total ammonia, un-ionized ammonia, total phosphorus, chloride, temperature and dissolved oxygen. The effluent monitoring requirement is to ensure the plant is meeting the effluent criteria in the ECA.</p> <p>Based on the established agreed (MECP and CVC) effluent limits and the results of the assimilative capacity study:</p> <ul style="list-style-type: none"> i. The mixing zone of 152 m was predicted under 7Q20 flow conditions in the West Credit river, and represents worst case flow conditions. Flows will be higher 95% of the time, and therefore the mixing zone will be smaller 95% of the time. <ul style="list-style-type: none"> a. There will be no impact to fish and fish habitat beyond the mixing zone and minimum potential impacts within the mixing zone. b. The ESR and related documents outline a full build out worst-case scenario (7Q20 flow in the river including potential effects from climate change) and illustrate that there will be no direct impact to fish and fish habitat under this worst case scenario beyond the mixing zone. Additional groundwater pumping is not expected to affect groundwater recharge to the river as planned municipal wells are not close to the river. Hydrogeological studies and applications to MECP for additional municipal water wells will address this issue. c. It is not expected that this project will impact the plan to introduce the Atlantic Salmon to the upper reaches of the West Credit River. Impact of the effluent discharge will be very local, and the outfall design will allow fish to pass through the mixing zone which will be designed to maintain effluent free portions of the receiver. Downstream of the mixing zone all PWQO's will be met. d. The impact of the treated wastewater will be very localised. There is not expected to be any impacts on the aquatic ecosystems downstream of the mixing zone including the Forks of the Credit Provincial Park and UNESCO Niagara Escarpment World Biosphere Reserve ii. At the request of MECP and CVC, studies were conducted during the Class EA to identify potential species at risk in the aquatic environment and none were identified. A specific study to look for the presence of SAR Mussels which are sensitive to chlorides, revealed that they are not present within this stretch of the river. The localised impact zone before PWQO's are met mean that it is extremely unlikely that the outfall will place any species at risk in danger. iii. The Natural Environment report conducted as part of the provincial class environmental assessment identified several terrestrial species at risk and implementation plans will minimise the impact to all of these species. Construction timing especially along the Elora Cataract Trail will minimise any impact on breeding birds and amphibians. iv. The project will promote economic growth in the Town of Erin's urban areas allowing the downtown areas to prosper. The project is not expected to have any impact on angling either within the Town of Erin or in the downstream communities. v. The project is not expected to impact Indigenous peoples as a result of changes to the environment. vi. The Town does not foresee the project having any cumulative effects in general, beyond those already identified within the ESR and mitigated through the completion of the appropriate studies. vii. All project documentation was made available for review on the Town website at all times. This documentation clearly shows all the technical and background studies that formed the basis for all decision making. All project materials illustrate the transition from the previously conducted master plan through all of the detailed work and decision making.

¹ The 7Q20 flow is the lowest 7 day flow that is expected to occur once in 20 years and will be exceeded at least 95% of the time

TABLE 2 – RESPONSE 2 - IAAC INFORMATION REQUEST

Required Information	Response or Attachments
	viii. As outlined in the part 1 response, the Town has conducted a comprehensive public consultation plan during the provincial class EA process. Significant input was received from members of the public liaison committee before each of public contacts that were conducted during the Class EA and from members of the public during the public information centres.
4. For all federal licences, permits, authorizations, approvals, and/or financial assistance that may be provided for the Project, describe any anticipated adverse direct or incidental effects (including changes to health, social and economic conditions) that may occur as a result, and how they will be managed including mitigation and follow-up measures.	See attached Permit and Approvals Table.
5.a) Describe the steps that you have taken to engage the public and any steps that you will take for engagement during all phases of the Project. To the extent possible, provide details on your plans. b) Indicate whether you are aware of public concerns in relation to the Project. If yes, provide an overview of the issues, including those raised in the enclosed letter, and indicate in general terms how you intend to address these matters.	<p>A comprehensive list containing 81 interested parties, local residents, Agencies and Indigenous Groups was developed at the initiation of the Class EA. The list of interested parties and local residents was updated throughout the study. This comprehensive list was used for the distribution of all notices/communications related to the Class EA. Copies of the list are included in the respective Appendices of the ESR for each point of contact described below.</p> <p>The following points of contact were arranged to provide information and obtain input from the public, Review Agencies and Indigenous groups</p> <ul style="list-style-type: none"> • The “Notice of Commencement” dated April 13, 2016 was published in the Erin Advocate and the Wellington Advertiser on April 13, 2016 and repeated on April 20, 2016 (both publications are released on the same day). In addition, the “Notice of Commencement” was emailed/mailed to the 81 interested parties, local residents, Agencies and Indigenous Groups on May 5, 2016. Copies of this information is within Appendix A of ESR (Volume 1 of 3). • The “Notice of PIC #1”, which was conducted on June 22, 2017, was published in the Erin Advocate and the Wellington Advertiser on June 7, 2017 and repeated on June 14, 2017. In addition, the “Notice of PIC #1” was emailed/mailed to the 81 interested parties, local residents, Agencies and Indigenous Groups on June 8, 2017. Copies of this information is within Appendix A of ESR (Volume 1 of 3). • The “Notice of PIC #2”, which was conducted on February 2, 2018, was published in the Erin Advocate and the Wellington Advertiser on January 3, 2018 and repeated on January 10, 2018. In addition, the “Notice of PIC #2” was emailed/mailed to the 81 interested parties, local residents, Agencies and Indigenous Groups on January 19, 2018. Copies of this information is within Appendix A of ESR (Volume 1 of 3). • The “Notice of Completion”, was published in the Erin Advocate and the Wellington Advertiser on May 9, 2018 and repeated on May 16, 2018. In addition, the “Notice of Completion” was emailed/mailed to the 81 interested parties, local residents, Agencies and Indigenous Groups on May 3, 2018. A follow-up email with a Drop Box link to the ESR was issued on May 15, 2018. Copies of this information is within Appendix A of ESR (Volume 1 of 3) <p>Both PIC’s #1 & #2 were conducted as a “drop-in” format to present the problem, describe the study area environment, identify and assess alternatives, discuss the preferred alternative, and to provide some preliminary design information. In addition, each PIC also included a formal presentation to the attendees, followed by a question and answer period.</p> <p>Throughout the study, the Town and the Project Team held Core Management Team (CMT) meetings which involved representatives of the MOECC, CVC, and County of Wellington. A total of 6 CMT meetings were held throughout course of the study.</p> <p>In addition to the CMT, the Town established a Public Liaison Committee (PLC) consisting of volunteers from the community, some of whom</p>

TABLE 2 – RESPONSE 2 - IAAC INFORMATION REQUEST

Required Information	Response or Attachments
	<p>were representing community action groups within the Town. At the initiation of the Class EA members of the Public were invited to join the PLC. The Project Team held a total of 4 meetings to consult with the PLC to provide information on the progress of the Class EA and to receive feedback on the materials being prepared.</p> <p>The Town has included plans for public consultation at all stages of the project. Public Information Centres will be conducted prior to construction of all components of the wastewater system to seek input from any affected parties and to mitigate potential impacts.</p> <p>The Town is aware of all of the public concerns with the project and continues to consult with all parties to ensure a successful outcome for the Town and for the natural environment.</p> <p>The Town is very much aware of the concerns from residents over the cost of the project and the Town is placing considerable efforts to finance the project for the betterment of the existing residents. The Town has achieved agreement with developers in the growth areas to finance the wastewater treatment plant and trunk sewer system. This has the potential to considerably reduce the servicing costs for existing residents. The Town is continuing to secure financing for the existing communities.</p> <p>The Region of Peel , Centre Wellington and the Town of Caledon were included as contacts on all notices and comments were only received from the Region of Peel (refer to Appendix N of ESR - Volume 3 of 3, page 814-817 of the PDF for comments and response). In addition, residents from the Belfountain area including Ms. Judy Mabee were aware of the ongoing Class EA process and actually attended the Public Information Centre (PIC) #2 in Feb 2018. During the provincial Class EA process, three Request for Part II Orders were received by MECP. The issues raised in the Request for Part II Orders are essentially the same as in the referenced letter received by the Town and other authorities. Project documentation clearly demonstrates that all of the issues raised in the letter were adequately addressed by the Town. Comprehensive responses were provided to MECP by the Town related to the Part II Orders and these were reviewed by MECP and the Class Environmental Assessment was approved by the Minister without conditions. Subsequently the Town has proceeded with implementation.</p> <p>The opinion of the Town is that the issues raised in the letter have been adequately addressed and will continue to be addressed through the project implementation stages.</p> <p>Project documentation clearly demonstrates characterization of the existing brook trout population and what is required to protect the brook trout.</p> <p>Project documentation clearly shows that the potential effect of climate change was taken into account in agreement with the local conservation authority based on the worst case low flow scenario in the river. Any warming of the river from climate change will proceed independently of, and will not be influenced by, the project.</p> <p>Project documentation clearly shows that the temperature effect from the effluent was adequately researched and that approval authorities (MECP and CVC) agreed with the analysis and did not intend to impose a temperature limit on the effluent. It is likely that approvals by these authorities (and potentially DFO) will impose monitoring criteria related to effluent temperature to protect the fisheries resources. Technologies exist to extract heat from the effluent if this is required.</p> <p>Project documentation clearly shows that the Town made all project materials available to the public at all times</p> <p>Project documentation clearly shows that the Town conducted a comprehensive public consultation process during the Provincial Class EA process and that this process was accepted by and approved by MECP</p>

TABLE 2 – RESPONSE 2 - IAAC INFORMATION REQUEST

Required Information	Response or Attachments
	<p>Project documentation clearly shows that the Natural Environment Report conducted as part of the Provincial Class EA process defined species at risk and that this was considered in developing mitigating measure to minimise any impact including migratory birds. Implementation plans will continue to mitigate any potential impacts.</p> <p>Project documentation clearly shows that cumulative effects from the project were taken into account through consideration of worst case scenarios used to develop effluent criteria using the 7Q20 river flow after 10% reduction to correct for potential climate change effects. The absence of significant effects from the project undertaking itself means that a formal cumulative effects assessment is not required (IAA 2012).²⁾</p>
<p>6.a) Describe the steps that you have taken and will take to consult with Indigenous groups (please list the groups included). Provide a record of engagement as well as planned engagement. Provide general information about your commitments to work with Indigenous groups to mitigate any potential impacts.</p>	<p>Please refer to our response within Request 1 for an outline of contacts with Indigenous groups during the provincial class environmental assessment process.</p> <p>Please refer to Section 5.0 pages 14-21 of the ESR (Volume 1 of 3) for a record of these contacts.</p>
<p>6.b) Indicate whether you are aware of general concerns from Indigenous groups in relation to the Project. If yes, provide an overview of the key issues and indicate how you plan to address these matters. If applicable, describe how you intend to keep Indigenous groups involved during project implementation.</p>	<p>The Town is not aware of any issues or concerns raised by Indigenous groups with respect to the project.</p> <p>Please refer to our response to Request 1 for the Town plan to keep Indigenous groups involved in the project.</p>
<p>7. Do you have any other comments in relation to environmental effects or impacts to the public or Indigenous peoples and how you intend to address and manage those, or have addressed and managed them?</p>	<p>Potential impacts to fish and fish habitat (including brook trout, Atlantic salmon, and aquatic species at risk were addressed through the ACS (HESL 2018) and the Natural Environment Report (HESL 2018) Refer to ESR Appendix D (Volume 2 of 3). Specifically:</p> <ol style="list-style-type: none"> 1. The ACS was completed following MECP's published policies and guidelines, and in consultation with MECP and CVC, who reviewed the draft reports and approved the final reports. 2. Water quality predictions in the ACS were compared to Provincial and Federal water quality guidelines. These are developed to protect sensitive species under continuous, long-term exposure, such that minor exceedances over the 7-day low flow period will not be harmful to aquatic life. CCME (2007) states " Guidelines are meant to protect all forms of aquatic life and all aspects of the aquatic life cycles, including the most sensitive life stage of the most sensitive species over the long term, from the negative effects of anthropogenically altered environmental parameters (e.g., pH, temperature, and dissolved oxygen) or exposures to substances via the water column. The ACS shows that water quality meets water quality guidelines outside of a small mixing zone (152 m maximum) downstream of the outfall. Therefore, all aquatic life, including brook trout, Atlantic salmon, Redside Dace and "aquatic ecosystems" will not be threatened by dispersal of treated effluent from the Erin WWTP. It should be noted that Redside Dace habitat located > 4 km downstream is well outside the mixing zone. Water use downstream of the mixing zone by members of the public, Indigenous peoples and recreational activities will not be affected by the discharge of the treated effluent. 3. Modelling and water quality predictions in the ACS were completed using a conservative assessment, which included: <ol style="list-style-type: none"> a. 7Q20 low flow condition. The 7Q20 flow is the lowest 7-day flow that is expected to occur once in 20 years and will be exceeded at least 95% of the time. It is not a typical or average condition. The 7Q20 flow was calculated at the 10th line, ~1.3 km upstream of the recommended outfall location at Winston Churchill Blvd. The ACS documented that groundwater inputs increase flows in the West

² Refer to page 21 of Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012

TABLE 2 – RESPONSE 2 - IAAC INFORMATION REQUEST

Required Information	Response or Attachments
	<p>Credit River by ~15% between 10th Line and the proposed outfall location. The flow in the river at the point of discharge (Winston Churchill) will be higher than the one used in the ACS to predict effects as the river between these two points is a gaining stream . Flows were also reduced by 10% to account for climate change, which added another element of conservatism to the assessment.</p> <ol style="list-style-type: none"> b. 75th % background concentrations - enriched (75th percentile) conditions were used to describe background water quality in the West Credit River, and therefore predicted downstream water quality was enriched compared to “average” or typical conditions. c. Effluent limits (e.g. maximum effluent concentrations) were used to predict downstream water quality, however the WWTP will be designed and constructed to operate at the effluent objectives (Table 28 ACS), which are more restrictive than the effluent limits, therefore predicted downstream water quality was more greatly impacted than would be observed under “average” or typical conditions. Under all conditions other than 7Q20 flow the mixing condition will be less than the 152 m. <ol style="list-style-type: none"> 4. An assessment of the effluent discharge on SAR mussels provided in Appendix H³ of the ACS (ESR Volume 2 of 3). The survey was completed in in response to MECP’s concerns regarding increased chloride concentrations in the WCR on species at risk (SAR) mussels. The survey found no SAR mussels within the surveyed reach, or review of background information for the West Credit River. Based on the investigation, the report concluded that the increase in chloride concentrations would not result in impacts to SAR mussels 5. An assessment of the thermal impacts of effluent on the West Credit River and Brook Trout was provided in Appendix J of the ACS. Brook Trout were selected as the sentinel species to assess effluent impacts on water temperature as they are ranked as the most sensitive fish species in Toronto -area streams⁴. The predicted increases in temperature in West Credit River downstream of the outfall was assessed through mass-balance and CORMIX modelling. The assessment found that discharge of effluent is not expected to cause any adverse effects on the survival, growth, and reproduction of the Brook Trout population. 6. The assessment of the proposed outfall location (WWTP, forcemains, and outfall locations) was evaluated based on the presence of provincially and/or federally designated SAR, sensitive species and significant habitat. The Winston Churchill Blvd outfall location was selected as it was downstream of brook trout spawning habitat, and 2 m upstream of a large culvert that represents degraded aquatic habitat due to shading, limited macrophyte growth and channel morphology. 7. Impacts will be mitigated through a variety of recommended mitigation measures related to installation of the gravity sewers, effluent outfall, WWTP site and forcemain routes as listed in the Natural Environment Report (HESL, 2018). Mitigation measures include adherence to recommended effluent treatment limits as developed in the Assimilative Capacity Study (HESL, 2018), construction timing windows, Erosion and Sediment Control, construction techniques, site selection, stormwater management, and landscaping/restoration. Implementation plans include the preparation of environmental management plans for all facility sites including the WWTP and sewage pumping station sites and sewers and forcemains. Implementation plans also include the appointment of an environmental inspector for all assignments to ensure that all mitigation measures are enforced. 8. A monitoring plan was recommended in the Natural Environment Report (HESL, 2018) to assess the response of the river to the effluent discharge. The monitoring plan will ultimately be reviewed by CVC and regulated through the ECA and should include an assessment of fisheries, benthic invertebrates and aquatic habitat with sufficient effort to allow for natural variability to be controlled and allow for a sensitive determination of any impact. The Town is working with these approval authorities to ensure that the final solutions incorporate the ability to monitor water quality. <p>The potential for the project to impact groundwater flow to the river through increased population will be considered in any Permit To Take Water for new groundwater wells. Wells have been located and their capacity rating must demonstrate no long term drawdown of the aquifer from</p>

³ Natural Resource Solutions Inc., 2017. Re: West Credit River Freshwater Mussel Survey, Town of Erin, Ontario.

⁴ Wichert, G.A. and H.A. Regier. 1998. Four Decades of Sustained Use, of Degradation, and of Rehabilitation in Various Streams of Toronto, Canada. Pp. 189-214 in Rehabilitation of Rivers: Principles and Practice. Edited by I. de Waal, A.R.G. Large, and P.M. Wade. John Wiley and Sons, London.

TABLE 2 – RESPONSE 2 - IAAC INFORMATION REQUEST

Required Information	Response or Attachments
	<p>which they are drawing. The hydrogeological study for the new wells also shows the zone of influence of each well as part of provincial regulations for source water protection. It is not anticipated that water taking for municipal use will have any significant impact on the flow in the west credit river. The project implementation plans include hydrogeological studies to examine the potential to affect groundwater and suitable mitigation will be developed resulting from these studies.</p> <p>In their letter dated March 9, 2018 Volume⁵ referenced within Appendix N of the ESR (Volume 3 of 3) the MECP, stated that an effluent criterion will not be required for chloride, however they stated:</p> <p><i>we intend to advise our approvals staff to include a condition in any future approval under Section 53 of the Ontario Water Resources Act that chloride be monitored in the influent, effluent, and receiving water. The Ministry recommends that a contingency plan be developed for the management of chloride when it exceeds the long-term Canadian Water Quality Guideline of 120 mg/L in the receiving water. Costs associated with the implementation of the contingency plan should be estimated and included as part of the total project cost.</i></p> <p>The Natural Environment Report (HESL 2020) recommended that the ECA include a requirement for the development and execution of a monitoring plan in consultation with the CVC. The monitoring program is to include an assessment of fisheries, benthic invertebrates and aquatic habitat with sufficient effort to allow for natural variability to be controlled and allow for a sensitive determination of any impact.</p> <p>Growth areas identified in the Class EA process (and the prior studies completed by the Town) were all established within provincial guidelines such as the “Places to Grow” legislation. The CVC indicated that they did not wish these growth areas to be serviced by individual private systems. The potential impact on the West Credit River from the existing communities and growth areas would be greater than from a municipal system designed to meet strict effluent requirements. In fact the Ministry of Environment in Ontario has recognised for many years that wastewater issues within the urban areas of Erin should be addressed. Because of these issues, the two urban areas have not been able to grow and the wastewater project is seen as a key issue in securing a prosperous future for the Town.</p> <p>Subsequent to the Class EA, the Town completed a growth management study to assist in setting planning guidelines to manage growth to 2041. The Town continues to conduct studies to control the impacts of growth and members of the public have access to these studies. The Town intends to continue to consult with residents concerning growth planning.</p>
<p>8.Explain your views on whether the Project should be designated under the IAA.</p>	<p>The Project should not be designated under the IAA. The Town has completed a comprehensive Class Environmental Assessment process in accordance with the Provincially regulated Class Environmental Assessment Act for water and wastewater projects. This process resulted in the approval of the Class EA by Minister Yurek on Aug 29, 2019 on behalf of the MECP, along with the support of the local conservation authority (Credit Valley Conservation). The Town is committed to all of the environmental mitigation measures identified with the environmental assessment process and to obtaining all of the necessary approvals from the applicable federal, provincial, and municipal authorities. The Town is committed to environmental sustainability.</p> <p>The concerns of the requestor have been fully addressed through the Class Environmental Assessment process including the Requests for Part II Orders which raised many of the same issues which was comprehensively considered and dealt with first by the Town and then by Minister</p>

⁵ Letter dated March 9, 2018 from Barbara Slattery, Ministry of Environment and Climate Change Re: Review of December 6, 2017 Assimilative Capacity Study, Town of Erin Proposed Wastewater Treatment Plant

TABLE 2 – RESPONSE 2 - IAAC INFORMATION REQUEST

Required Information	Response or Attachments
	<p>Yurek on Aug 29, 2019 on behalf of the MECP,</p> <p>In reliance on having fully complied with the Provincial Class Environmental Assessment Process, undertaken in consultation with relevant Federal Ministries and Agencies, the Town entered into legally binding contractual agreements and taken securities totalling more than \$85 million. These agreements and the associated security is critical to finance the construction of the WWTP and associated infrastructure and to reduce the cost burden on existing residents of the Town as much as possible. In accordance with those agreements the Town is required to proceed with design and construction of the WWTP according to specified timelines. The WWTP is a generational infrastructure project for the Town which could be jeopardized as a result of any unnecessary delay that a designation under the IAA would cause.</p> <p>Therefore, the Town does not consider that the project should be a designated project under the IAA, having complied with all Provincial requirements and a continuing commitment to comply with all relevant and applicable provincial and federal regulations.</p>