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Mayor Matt Brown and Councillors
City of London

Re: Springbank Dam

Media reports indicate that the legal action over Springbank Dam has been resolved. Now City Council faces an important decision regarding the future of the dam.

As council considers this issue, I urge you **not** to rely on the outdated information contained in the Environmental Assessment (EA) from 2003. Much has changed since that time. First and foremost, it is essential to recognize that the river has been flowing freely, without seasonal blockages since September 2006. The EA that was prepared in 2003 was done on the basis of the reservoir that was in place at the time. The EA actually predicted that in the absence of a dam and reservoir, there would be long-term improvement in water quality through natural sediment transport processes, and improved flow conditions. Now is the time to review conditions in the river, to confirm that improvements have occurred.

An especially important issue to consider is the presence in the Thames River of species protected under Ontario's Endangered Species Act 2007 (ESA 2007). Today's requirements for the protection of species and habitats under ESA 2007 are more stringent than those that were in place 13 years ago when the EA was prepared. The absence of water impoundment has provided improved habitat conditions for several protected species. Closing the gates of the dam will have an adverse effect on this habitat. Destruction of habitat used by species at risk will require costly mitigation and compensation by the city, and will result in increased costs to taxpayers. I am familiar with three of Ontario's species at risk that utilize the Thames River between the forks and Springbank.

- The spiny-soft-shelled turtle is classified as Threatened. No doubt these turtles have benefited from lower water levels that provide open sand or gravel nesting areas, and areas for basking;
- The Barn Swallow is classified as Threatened. It nests on structures above or near the river, and accesses nesting material from areas that are exposed with lower water levels;
- Map Turtle is classified as Special Concern, and also benefits from additional areas for basking.

I wonder what other species at risk may currently be utilizing this section of the Thames River?

In the absence of the reservoir above the dam, there has been a wonderful growth of natural vegetation along the banks of the Thames. A casual visitor will note the young Sycamore trees that are growing along the river's edge at locations extending from Cavendish Park downstream to the dam structure. The Sycamore is one of our most beautiful native trees, and these have grown at no cost to taxpayers. Closing the dam and flooding the banks would kill these healthy young trees. What other valuable trees and shrubs might be lost?

Water quality is an ongoing concern in the Thames River, especially in the area downstream of the Greenway Wastewater Treatment Plant. If the dam is reinstated, then once again, discharge from the Greenway plant will go directly into the reservoir, where the pollutants are stored in hot summer weather. Water quality problems are worsened by frequent bypasses, when untreated raw sewage from Greenway and other waste water treatment plants enters the river. A contaminated reservoir does not create a desirable environment for recreational canoeing.

I urge council to decommission the Springbank Dam. If Council has any hesitation about the wisdom of decommissioning the dam, then council must undertake a new, comprehensive EA to guide the decision-making process. It is essential for Council to fully understand all the implications of the Springbank Dam, in the context of today's river conditions and today's environmental laws, before making any decision.

Yours truly,

David Wake