

March 14, 2016

Mayor Matt Brown and Councillors
City of London
City Hall
300 Dufferin Ave
London, N6A 4L9

Dear Mayor Brown and City Councillors:

Re: Future of Springbank Dam

I do not support restoration of Springbank Dam. My preference is for the dam to be decommissioned, which I understand will require a Schedule B Municipal Class EA. Restoring the dam would be an action contrary to modern-day views on how healthy rivers should be protected and sustained. A restored Springbank Dam would serve no other purpose than to provide recreation to a small proportion of one species (humans) for a few months of the year, while ignoring the health and sustainability of the other species in and alongside the Thames River. Dams for such non-essential and limited purposes are no longer environmentally appropriate. London has the large Fanshawe Dam on the Thames River, which is essential for flood control. However, it contributes to water-quality problems upstream of the dam wall and disrupts the movement of aquatic species. We do not need to compound this harmful impact on the Thames River by restoring the Springbank Dam. Fanshawe Dam already provides boating and canoeing opportunities, and canoeing on the Thames is possible when water levels permit it during several months of the year. If full decommissioning would be prohibitively expensive, I would support removal of only the hydraulic gates and all operating equipment, leaving the concrete structure in place, as suggested by Councillor Armstrong.

I wish to express my dismay about the very one-sided, anthropocentric, Staff Report, "*One River*" - *Master Plan Environmental Assessment*, which was prepared by John Braam and presented to the Civic Works Committee at its meeting on March 8, 2016. Staff wants to see both the Springbank Dam and 'Back to the River' projects "considered together in a Municipal Environmental Assessment (EA) study using the Master Plan approach". Staff failed to take into account a strong call from many Londoners and organizations for a different option, viz. decommissioning and an EA for Springbank Dam that is separate from an EA for the 'Back to the River' project. Why does Staff suggest, on page 4 of its *One River - Master Plan Environmental Assessment* Report, under the bullet "Combining the projects for substantial cost efficiencies", that both the Springbank Dam and 'Back to the River' projects will involve "completing an Environmental Study Report"? The Class Environmental Assessment Process chart shown in Appendix A of the Staff Report clearly indicates that only EA Phases 1 and 2 are required for a Schedule B project (p. 2 of the report classifies the Springbank Dam EA as Schedule B), which does **not** require an Environmental Study Report (Phase 4), and should be much more economical than the Schedule C EA needed for the 'Back to the River' project, which would require EA Phases 1 through 5. The Staff Report does mention that an EA for Springbank Dam has been recommended by the Ministry of Natural Resources and Forestry. Too much importance is given to justifying the 'Back to the River' project, and not enough to removing the dam.

Such a biased report from Staff does not represent a democratic approach to the contentious issue of what should be done with the failed dam, and seems to be more concerned with the short-term accommodation of human recreational activities than the long-term protection and ecological health of our Thames River. Consideration of a reasonable range of alternative options, identification and consideration of the effects of each alternative on all aspects of the environment, and systematic evaluation of alternatives in terms of their advantages and disadvantages to determine their net environmental benefits, have not been given sufficient attention in the Staff Report. I would argue that the purpose of the Ontario Environmental Assessment Act (OEAA), viz. “. . .the betterment of the people of the whole or any part of Ontario by providing for the protection, conservation and wise management in Ontario of the environment“, is not being fully respected in this report, which puts social, cultural, built, and economic environments ahead of protection of the river and its associated plant and animal life. The OEAA lists air, land, water, plant and animal life (which includes humans) as the first two bullets of the list of what qualifies as “environment”. Restoration of the dam would appear to be contrary to the objective in Section 3E of London’s 2019 Strategic Plan – “Strong and Healthy environment through protection of the natural environment.”

The Endangered Species Act 2007 has come into effect since the 2003 EA for Springbank Dam was done, and species at risk and their habitats in the vicinity of the dam are now protected under the Act. The Staff Report acknowledged that the area is habitat for species at risk, and that the protection required by provincial and federal legislation for species at risk will have implications on the future public use of the area.

In summary, I see the Springbank Dam project as quite distinct from the ‘Back to the River’ project, and it is my opinion that the ‘Back to the River’ project should not require restoration of the dam. The two projects should have separate Municipal Class EAs, even though their areas of influence overlap. Removal of the dam will benefit the river into the future, whereas the ‘Back to the River’ project will bring about considerable human pressures on the river, which will require ongoing monitoring. If Londoners have been able to accept lower levels of water in the Thames through the majority of months in a year in the absence of a functioning Springbank Dam, I think they should be able to accept varying river water levels throughout the year, as is the current state of affairs. As a result of the failure of the dam’s hydraulic gates, the river has been flowing freely in the projects’ study area and several natives species, including Sycamore trees, have been able to re-establish themselves on the banks where the dammed water would have otherwise swamped them, and have increased biodiversity along the river.

I wish to thank Council for the opportunity to comment, and I hope my comments will receive careful consideration.

Sincerely,

Anita Caveney
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