

597 Kildare Road
London ON N6H 3H8
March 15, 2016

City Council,
City of London

Re: Springbank Dam

I attended the Civic Works Committee meeting on March 8. Having listened carefully to the submissions, the comments by staff, and the debate among members of the committee, I offer the following comments.

I urge Council to reject the recommendation of the Civic Works Committee for a One River Master Plan EA, encompassing Springbank Dam and Back to the River projects at the Forks.

I write to you as one who has 35 years of professional experience, managing, conducting and reviewing Environmental Assessments. It is clear to me that the most cost-effective approach in this case would be for Council to, first of all, make a decision that the **Springbank Dam will not be repaired**. With the Thames River flowing freely in all seasons, future water levels at the Forks will be within a predictable range. Those who undertake EA studies for Back to the River projects will be able to use this base line information with confidence.

Separating the decision-making process for Springbank Dam from the studies required for Back to the River will simplify the effort required for both. Each of these projects has its own purpose and rationale. To leave the dam "as is" (non-operating) would not require an EA. To convert the dam to a pedestrian bridge would have minimal EA requirements. Decommissioning the dam (i.e. removing all components) would require an EA, but the focus would be limited. On the other hand, a study that combines a Springbank Dam EA with those for Back to the River projects would be more complex, resulting in confusion and delay.

The staff report for the Civic Works Committee acknowledges that the Thames River upstream of the Springbank Dam provides habitat for a number of species at risk. These turtles, fish and mussels are protected by federal and provincial legislation. It is clear that by operating Springbank Dam and reinstating an impoundment above the dam, the City would destroy nesting habitat for protected turtles, isolate fish populations, and create unacceptable habitat conditions for at-risk mussels. I am familiar with the very stringent requirements for the protection of species and habitats under Ontario's Endangered Species Act. Destruction of habitat used by species at risk would require complex and costly mitigation and compensation efforts to be undertaken by the City. In addition to the unnecessary environmental damage, the mitigation and compensation would result in increased costs to taxpayers.

I ask Council to give clear direction that the EA for Back to the River be separated from studies for Springbank Dam. I also ask that you direct staff to report back on options for the Springbank Dam that will provide for a free-flowing river.

Yours truly,

David Wake