

597 Kildare Road
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February 27, 2016

Civic Works Committee
City of London

Re: Springbank Dam

I have reviewed the staff report provided with the Civic Works Committee agenda for February 2, 2016. I have also reviewed the Environmental Assessment that was prepared in 2003.

I urge councillors **not** to rely on the outdated information contained in the Environmental Assessment (EA) from 2003.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 undertake a thorough review of water chemistry and aquatic biology to confirm that improvements have occurred. 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.

I note that the staff report makes reference to species protected under Ontario's Endangered Species Act 2007 (ESA 2007). The requirements for the protection of species and habitats under ESA 2007 are far 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 complex and costly mitigation and compensation by the city, and will result in increased costs to taxpayers.

In the absence of the reservoir above the dam, there has been regeneration of natural vegetation along the banks of the Thames. For example, 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. These trees have grown at no cost to taxpayers. Closing the dam and flooding the banks would kill these healthy young trees. What other valuable native plants 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. A contaminated reservoir does not create a desirable environment for recreational canoeing, or for Londoners who wish to enjoy walking beside the river.

I urge city council to decommission the Springbank Dam. If, for some reason, council is tempted to repair the dam, then I ask that you undertake a new comprehensive EA, focused only on the Springbank Dam and reservoir. Combining a Springbank EA with other projects will result in confusion. The success of the Back to the River project does not depend on an operating Springbank Dam.

Yours truly,

David Wake