

The Thames River Anglers Association

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Nov. 2nd, 2016

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Feedback regarding (DRAFT) Terms of Reference and Problem Statement for “One River” Master Plan Environmental Assessment

Now that the much anticipated document outlining the drafts of the Terms of Reference and Problem/Opportunity statement for the “One River” Master Plan Environmental Assessment have been made publicly available our organization would like to provide a few comments and request some changes while this is still before the Civic Works Committee.

Community Engagement:

First and foremost; we would like to say that it is encouraging to hear that there will be numerous opportunities to engage the community through consultation sessions during the various phases of this process. We are optimistic that these meetings allow for open dialogue and an opportunity for the community to have real input into the decisions regarding the final outcome.

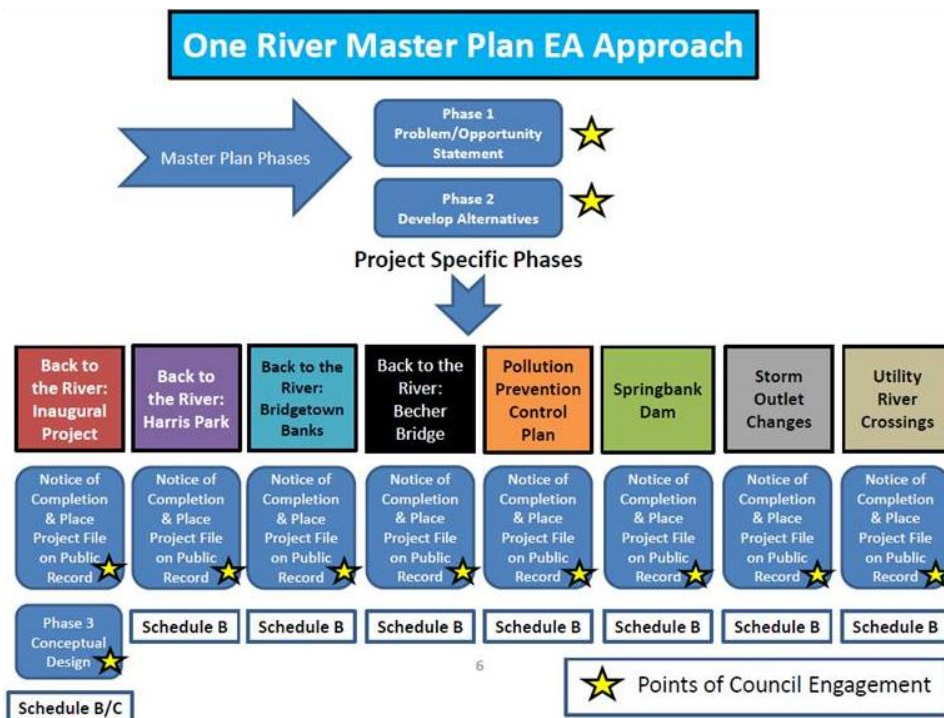
- We would like to formally request that any community consultation sessions throughout this process are arranged with at least 30 days advance public notice.
- We also ask that any venue for the community consultation sessions will accommodate a capacity of more than 150 attendees.
- Due to the complexity of a Master Plan EA we ask that the window available for formal written feedback be extended to 45 days for the Terms of Reference, Problem Statement and Consultant Selection and 60 days for Alternative and Preferred Alternative Selection.
- It is also mentioned that there is discussion around forming a technical committee that includes organizational representation and members of the community. We would also formally request that this happens and that our organization is invited to participate.

Hunt Weir:

As expected; we are also pleased to see that there is some initial consideration about whether to repair, decommission or repurpose the Hunt Weir behind the historic Labatt's Brewery.

Decision Flowchart & Timing:

It was also good to see that the change requested and supported by council that “a decision to move ahead with the “One River” Master Plan EA does not preclude a decision to decommission Springbank Dam” is clearly stated on page 1. In the council approved draft for the plan to move ahead with this approach it highlighted a chart that indicated when council would have opportunities to be involved:



- We would like to formally request that the Terms of Reference should also include these council engagement points as an important part of the process.
- The Terms of Reference should also clearly detail that council is permitted to make a decision regarding what to do with Springbank Dam at each of those engagement points should they feel that there is enough evidence and community support to do so.

First Nations Engagement:

There are numerous references to ongoing and future engagement with First Nations throughout this process. If the City of London is sincere in their efforts to respect the importance of Deshkan Ziiwing and Kahwy^hatati to our neighboring communities they will go beyond the constitutional obligation to consult and accommodate; and endeavor to have their full consent with the processes and projects moving forward.

West London Dyke Replacement:

The West London Dyke Replacement was removed from the draft “One River” EA Plan when it was before the Civic Works Committee and before being approved by council because the EA was completed for that project and construction is now underway. Including it again in this document is completely redundant and introduces unnecessary confusion to this process. Springbank Dam serves absolutely no purpose as a flood control structure and reintroducing that series of projects will mislead the public and muddy the waters of decision making.

- We would like to formally request that the West London Dyke Replacement project be removed from the Terms of Reference for this plan.

Fisheries, Habitat and Endangered/At-Risk Species Protection:

There are very minimal references to the importance of protecting the ecosystem of the Thames River within this document. During the consultation sessions for Back to the River and during the follow-up presentations protection of the riverine species and their habitat was a very high priority yet it is not even mentioned as a high level goal in Section 3.2. Along with the previously published 3 years of Biotactic studies that implicated the dam as a barrier to fish passage numerous scientific studies completed by the Upper Thames Conservation Authority were brought forward highlighting the recovery of many threatened and some endangered species of turtles, mussels, fish and birds within the Thames River watershed and the notable threat that a repaired Springbank Dam posed. The draft objective to “*maintain and enhance a healthy terrestrial and aquatic ecosystem within the context of an urbanized setting*” is not nearly sufficient. Whether the river runs through a city or a rural area doesn’t change the importance or necessity of protecting species at risk. This is an obligation that the city has to the Ministry of Natural Resources & Forestry, the Department of Fisheries and Oceans, the Upper Thames Conservation Authority, the Chippewa of the Thames First Nations, Oneida First Nations and Munsee-Delaware First Nations along with the people of the city of London and its downstream communities.

- Beyond the committee level change of including at-risk species protection in the problem opportunity statement we ask that the terms of reference include clear directives to build and deliver accountable plans to protect the species of the river and the habitat they require as part of any of the subsequent projects within the scope of the One River Master Plan EA.
- Completing additional inventories of species within the riverine ecosystem are important and should always be happening however we would ask that council and the consultants leverage the substantial amount of scientifically gathered and accredited data published during the last 20 years; including the studies on the spiny soft-shelled turtles that include a decade of research with the dam in place and a decade while not operational.

Objective versus Subjective Benefit Claims:

During this process scientific evidence will be brought forward regarding the rivers’ water quality, species within the ecosystem, how dams impact rivers and the economic and environmental costs associated with repairing Springbank Dam. We hope that the same level of accountable transparency and data is required of those who will claim social benefits, tourism opportunities, accessibility improvements or potential economic & job growth through the series of proposed shoreline projects. Saying that an enhanced riverfront will attract companies to London and create jobs requires substantiated proof or should otherwise receive a lower weighting in the selection of a preferred solution.

- We would formally ask that any claims of social or economic benefit from projects within the scope of the “One River” Master Plan EA require clear evidence that substantiate those claims.

Thanks again for the opportunity to provide input into this document and authorize it to be kept on public record and shared with committee members. Our organization is available for questions or feedback and we appreciate you taking the time to review this.



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