



October 22<sup>nd</sup>, 2017

Feedback from Thames River Anglers Association regarding: STAFF REPORT - One River Environmental Assessment  
Update: Agency Advisory Committee Report

Via email:

Jackie Martin [jmartin@london.ca](mailto:jmartin@london.ca) City Clerk's office

Members of the Civic Works Committee:

Councillor M. van Holst (Chair), Councillor B. Armstrong, Councillor P. Squire, Councillor P. Hubert, Councillor V. Ridley

Coped: Daniel Hsia, Ashley Rammaloo, Scott Mathers, Kelly Scherr,

Presented By:

Robert Huber – (President, TRAA)

The Thames River Anglers Association (TRAA) has been dedicated to protecting and sustaining a viable multi-species fishery within our namesake watershed for over 25 years through education, environmental advocacy and grassroots projects that help to rehabilitate the river.

Objective:

To provide feedback on the Staff Report – One River Environmental Assessment Advisory Panel Report submitted to the Civic Works Committee agenda for September 26<sup>th</sup>, 2017.

Comments:

Our organization is encouraged to see the progress with the agency reports. We appreciate the opportunity extended to the stakeholders and members of the public to review and consider the preferred options for Springbank Dam along with the more extensive One River Municipal Class Master Environmental Assessment. Having reviewed the documents submitted in detail there are a few concerns and questions that we would like to submit for your consideration.

a) Enhanced clarity regarding preferred options:

For the upcoming PIC sessions, we would ask for a better breakdown of the different options<sup>1</sup> to be communicated regarding the different approaches that may be considered within the options of “decommissioning” or “doing nothing” with Springbank Dam. It would be helpful to have a brief summary to clarify what decommissioning could potentially include - does it mean a full removal of the structure or repurposing as a bridge. If simply removing the metal doors and hydraulic arms is what is meant by the phase “salvage appropriate dam components”, then please communicate which preferred option this would be aligned with to eliminate any confusion.

b) More emphasis needed on fisheries impact

When Springbank Dam was repaired under the 2003 Environmental Assessment, a requirement to maintain the status quo for fish passage was included.

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<sup>1</sup> Appendix 'A' – Agency Advisory Committee Report, One River Environmental Assessment Agency Advisory Committee Report. Section 1.4.

*As a condition of approval for a Work Permit from Ministry of Natural Resources for the dam rehabilitation, a stated requirement is to maintain “status quo” regarding fish passage. This was required since the new gate installation will increase the bottom elevation of the river slightly at the dam. The overall footprint of the dam remains unchanged.<sup>2</sup>*

Subsequent reports resulting from a 3 year post-construction study commissioned by the City of London and completed by Biotactic Inc. indicated that fish passage over the lowered doors of Springbank Dam negatively impacted tagged smallmouth bass, white sucker and shorthead redhorse.<sup>3</sup>

**Passage Efficiency**

<b>Fish Species</b>	<b>2006 (Pre- construction)</b>	<b>2010 (Post- construction)</b>	<b>2008, 2009 and 2010 (Post- construction)</b>
White sucker	94% (74% - 99%)	68% (46% - 85%)	48% (34% - 62%)
Shorthead redhorse	94% (72% - 99%)	35% (18% - 57%)	53% (41% - 65%)
Smallmouth bass	89% (69% - 97%)	50% (30% - 70%)	44% (31% - 58%)

The report also stated,

*There was evidence in 2008 and 2009 that flow reversals and back-eddys created by the movement of water over the downstream lip of each gate may have negatively affected fish passage. In 2010 a sand wedge formed downstream from each gate that may have negated the back-eddy and flow reversal conditions previously observed. White suckers and shorthead redhorse were observed foraging on invertebrates that have colonized algae growing on the gates in 2010.<sup>4</sup>*

Additionally, Section 4.1.9 Fisheries Act states,

*The Fisheries Act contains three key provisions on conservation and protection of fish habitat essential to sustaining freshwater and marine fish species. The DFO administers section 35, the key habitat protection provision, prohibiting any work or undertaking that would cause the harmful alteration, disruption or destruction of fish habitat. The DFO also administers Section 20, which requires a fish-pass to be provided by the owner of any obstruction across or in any stream, should the minister determine it to be necessary for the free passage of fish.*

*The Department of Environment and Climate Change Canada (ECCC) administers Section 36, the key pollution prevention provision, prohibiting the deposit of deleterious substances into waters frequented by fish, unless authorized by regulations under the Fisheries Act or other federal legislation. A deleterious substance can be any substance that, if added to any water, would degrade or alter its quality such that it could be harmful to fish, fish habitat, or the use of fish by people.*

In particular, fixing the dam may require the building of a costly fish ladder to mitigate passage issues. The Thames River has a vast array of species; therefore, it could be very complex to design a fish ladder structure that works effectively with warmwater species, as compared to the trout & salmon fish ladders that are common. The TRAA would like to see additional information presented to committee for the PIC sessions, to demonstrate that this is still an important issue when considering the preferred options of whether to repair the dam or do nothing.

<sup>2</sup><http://council.london.ca/CouncilArchives/Agendas/Environment%20and%20Transportation%20Committee%20Agendas/ETC%20Agendas%202006/2006-10-30%20Agenda/item%204.pdf>

<sup>3</sup> [http://www.biotactic.com/Springbank\\_Dam\\_and\\_Fish\\_Movement\\_2010.htm](http://www.biotactic.com/Springbank_Dam_and_Fish_Movement_2010.htm)

<sup>4</sup> ditto.

- c) Further Involvement of Upstream and Downstream Stakeholders in feedback and decision process.  
As illustrated by the maps outlining critical and general habitat areas with identified threatened and endangered species at risk, there is a substantial amount of the watershed throughout the core of the city and upstream into Oxford county that needs to be protected.

*Current critical habitat mapping for the stretch of the Thames in much of the study area from just below the dam to the upstream sections of the river at the forks are not based on an assessment of critical habitat that has developed since the dam failed.<sup>5</sup>*

We would like to see continued effort to act on previous recommendations to inventory, monitor and enhance the habitat and protection of the river corridor. It is important to engage groups and communities outside of London in this process including the Oxford Stakeholders Association, communities in Chatham-Kent, and First Nations, that continue to share a common interest in the health of the Thames River and the species within it.

In Conclusion:

We would like to thank the staff, consultancy firms and members of council, in their availability and responsiveness to questions and concerns expressed by stakeholders. Our organization will continue to be actively involved in the One River Municipal Class Environmental Assessment after the fate of Springbank Dam is determined and appreciate the opportunity to be engaged directly in the process.

Thank you,  
Robert



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<sup>5</sup> Appendix 'A' – Agency Advisory Committee Report, One River Environmental Assessment Agency Advisory Committee Report, Prepared for the Agency Advisory Committee, September 2017. P 5-1