

The Corporation of the City of London
Civic Works Committee
300 Dufferin Avenue
London, Ontario
N6A 4L9

Attention: Councillor Virginia Ridley – Chair

Dear Ms. Ridley:

**Re: One River Master Plan Environmental Assessment Study
Phase 2 Stage 1 – Recommended Option for Springbank Dam**

The Upper Thames River Conservation Authority has received a “Notice of Public Participation Meeting” related to the above-noted project, scheduled for January 9, 2018 at the Civic Works Committee meeting. We have reviewed the Stage 1 Environmental Assessment Report prepared by CH2M as well as the staff report prepared for the Civic Works Committee’s consideration next Tuesday. As the Committee prepares to consider this matter, the UTRCA provides the following comments.

First, we commend the City of London for the commitment made to proceed with the Class EA exercise to help determine the fate of Springbank Dam as a critical first stage of the One River Master Plan. We would also specifically like to thank City staff including Scott Mathers and Ashley Rammeloo for their work on this challenging project. We have also been pleased with the work completed to date by the consulting team for this project, led by CH2M.

The UTRCA appreciated being invited to participate in the meetings of the “Agency Advisory Committee” during which agency representatives presented various regulatory perspectives. We feel that a clear direction was provided by this committee to the City and the consulting team. In reading the consultant’s report in December, we believe CH2M and the balance of the team understood the nature and intent of the information provided by the various agencies represented on the advisory committee.

The Civic Works Committee may also be aware that our General Manager, Ian Wilcox had prepared a written statement for local media in September of 2017 which read in part:

The new normal is a free flowing river. Vegetation and aquatic species have moved in to the former reservoir and by every measure it is a healthier system than existed while the dam was in operation. Given this significant improvement in the health of this section of the river, we cannot advocate for an outcome that would reverse this trend by re-creating an artificial impoundment. As things stand currently, Springbank is no longer a liability for our flood control operations, water quality has improved, new aquatic habitat has been created, and numerous species have benefited. While this outcome is in fact the result of an accident (failure of the dam), it has been one of the

single most significant, measurable improvements in any stretch of the Thames River Watershed. This has been proven by the science and it is our role in the EA process to ensure this science is shared with decision makers.

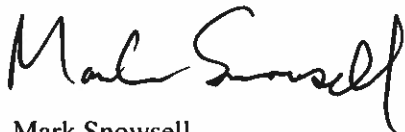
We believe the Stage 1 Environmental Assessment Report prepared by CH2M and the staff report prepared for your consideration January 9 provides affirmation of Mr. Wilcox's earlier statement. Clearly, the UTRCA is supportive of the recommendation to opt for a free-flowing river.

One additional potential benefit of "the new normal" not documented to any degree is that vegetation is now providing additional stability to the banks of the Thames River, in a reach of the river where erosion has been documented over time and where both private and public lands have been negatively impacted. We consider this a *potential* benefit as it remains to be proven whether the vegetative protection will reduce occurrences of bank erosion and instability over a prolonged period. Experiences across our watershed over many decades give us reason to be optimistic.

Moving forward, the Conservation Authority hopes to work closely with the City of London, the consulting team and other agencies as the EA process continues, offering advice and direction regarding the need for UTRCA approval(s) pursuant to Section 28 of the Conservation Authorities Act. Conservation Authority approval will be required for any works undertaken at Springbank Dam, including efforts to decommission the structure, if this is the direction taken by the City. The UTRCA should also be involved in any subsequent consideration of "re-purposing" of the dam infrastructure, to help ensure our regulatory responsibilities are satisfactorily addressed.

In closing we would like to again extend our thanks to the City of London for committing to address the Springbank Dam issue through the EA process and we look forward to working with all parties in subsequent stages of the One River Master Plan Environmental Assessment.

Yours truly,
UPPER THAMES RIVER CONSERVATION AUTHORITY



Mark Snowsell
Land Use Regulations Officer

c.c. Kelly Scherr – City of London
Scott Mathers – City of London
Ashley Rammeloo – City of London
Tom Mahood – CH2M
Ian Wilcox – UTRCA
Tracy Annett – UTRCA
Chris Harrington – UTRCA
Chris Tasker - UTRCA