



Nature London

The McIlwraith Field Naturalists of London Ontario Inc.
P.O. Box 24008, London, Ontario N6H 5C4

September 29, 2017

Ashley M. Rammeloo
Acting Division Manager
Stormwater Engineering
City of London

Dear Ms. Rammeloo,

I am writing in response to the City's invitation for input with regard to the One River Environmental Assessment, specifically the fate of the Springbank Dam.

It is the position of Nature London that the ecological integrity of the river is optimized if it is allowed to flow freely. As such, we are of the opinion that the Springbank Dam should NOT be repaired / reactivated.

Numerous studies have demonstrated the ecological benefits of having rivers flow freely. Four local examples are offered for your consideration:

- In its evaluation of various alternatives for the Harrington Dam in Zorra Township, the Upper Thames River Conservation Authority (UTRCA) in its Harrington Dam Class EA Draft Report stated: A Class Environmental Assessment study was initiated by UTRCA with the intent of identifying the preferred alternative for addressing the failure of Harrington dam to meet dam safety guidelines with respect to its spillway and embankment. Review of existing conditions through background review and field studies demonstrated environmental impacts of the pond on water quality, fish species diversity, and channel function . . . Through the evaluation process, **Alternative 4 (remove dam, create off-line pond, naturalize channel) was determined to be preferred.**
<http://thamesriver.on.ca/wp-content/uploads//FloodStructures/OtherStructures/HarringtonDamEA-report-Jn09-17.pdf>
- In highlighting conservation measures that have improved the health of the Grand River in recent years, the Grand River Conservation Authority notes on its website some examples of the work done to improve its waterways: **"Unneeded dams such as Beattie Dam in Fergus, Chilligo Dam in Cambridge, Wilkes Dam in Brantford and Taquanyah Dam near Cayuga have been removed. This allows fish to reach their natural spawning areas and expand their range. Removing dams can also result in cooler water temperatures."**
https://www.grandriver.ca/en/our-watershed/resources/Documents/Fishery/Fishery_ManagementPlan_Update2013.pdf
- From the Scanlon Creek CA Management Plan (2015): In 2011, the LSRCA (Lake Simcoe Region Conservation Authority) completed a Class Environmental Assessment for the Scanlon Creek Reservoir to identify alternative solutions to improve the chemical and physical components of fish habitat, while maintaining or enhancing recreational and educational values in the conservation area. The assessment process was used as a vehicle for reviewing and evaluating stewardship options for this system **and it was found that the preferred alternatives would involve i) removing the existing dam on Scanlon Creek; (ii) re-establishing a free-flowing creek channel; (iii) establishing adjacent wetland habitat in the newly exposed area; and, (iv) environmental monitoring of the construction process**¹⁴.
<http://www.lsrca.on.ca/Shared%20Documents/reports/scanlon-management-plan-2015.pdf>

- In his presentation entitled *Effects of Barriers and Low Flow on Species At Risk Along the Upper Thames River* to the City's Strategic Priorities and Policy Committee on April 3, 2017 UTRCA's Scott Gillingwater, a Species at Risk biologist, stated that ***“Creating artificial reservoirs along the (Thames) river is contradictory to natural processes, which can result in significant disturbance and mortality to aquatic and semi-aquatic species that depend on the river for survival.”*** He then adds, “Fanshawe Dam is necessary, as it provides flood protection for the City of London, though even this barrier is not appropriate for river-adapted wildlife, especially species at risk within the watershed. **Thus, it is important to limit the number of such barriers to only those that are deemed essential.”**

Since the dam has become inoperable, there have been both quantitative and qualitative indicators of improved river health.

A recent analysis of the City's Thames River benthic data by a Master's candidate at Western University revealed improved water quality (decrease in the Family Biotic Index), slightly higher biodiversity and fewer sites with high levels of algae. The analysis was made by comparing the mean of results from 2006-2008 (dam operable) with the mean of 2009 – 2012 (dam inoperable).

A recent report of a muskie landed by angler Matt Elias (London Free Press, September 12, 2017) lends further support to the river's improved health since the dam became inoperable. Said Rob Huber, president of the Thames River Anglers Association, “Big muskie can only make it upstream if water levels are high enough downstream of the dam, **the dam is open** and there are plenty of other fish species to dine on.”

While the dam previously created recreational boating opportunities on the river, it is not a requirement to enjoy the river as a paddler as highlighted in the September 18, 2017 article by reporter Randy Richmond. He reports: “Not only is the Thames River in London healthier without a working dam, it's just fine for canoeing,” says Christopher Johnston, co-founder of the Thames River Paddling Routes campaign. . . . “I feel that many paddlers who paddle a free-flowing river are being unfairly grouped with the ‘pro-dammers,’ ” he said. . . . “I've seen the river bounce back since the dam broke.”

Aside from maintaining the ecological improvements that have occurred since the dam became inoperable, leaving it so will save London taxpayers the considerable time and expense that would be involved in trying to reactivate the dam (London Free Press, September 21, 2017 article by Megan Stacey). As you know from the agencies involved with the potential reactivation of the dam, it would be “a considerable undertaking” and “extremely difficult to impossible” given that the Ministry of Natural Resources and Forestry has identified ten species at risk within the One River EA area, six of which are classified federally as “Endangered”.

In summary, for the reasons stated above, Nature London encourages the City NOT to reactivate the Springbank Dam. Thank you for your consideration of our views as part of your EA process. Should you require further clarification of our position or should you have any further questions, please do not hesitate to contact me. Following the clarification of the dam's future, we look forward to the consideration of the broader EA.

Sincerely,

Bernie VanDenBelt



President, Nature London
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