

# The Thames River Anglers Association

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## **Feedback from London area organizations & voters regarding Springbank Dam**

It is encouraging to hear that there is now an open dialogue and a committee tasked to work with our elected council and members of the community to decide what will happen next with Springbank Dam. Our organization, with the support of the many others representing thousands of passionate residents of London and surrounding communities feel this is the appropriate time to share our concerns regarding the future of the Thames River and Springbank Dam.

The Thames River Anglers has been dedicated to protecting and sustaining a viable multi-species fishery within the watershed for over 25 years through education, environmental advocacy and grassroots projects that help to rehabilitate the river. With Springbank Dam out of service we were given a rare opportunity to see exactly how the river and ecosystem would recover without a seasonal impoundment; and we have been very excited to see what is happening both above and below the water. The river itself is cleaner, the riparian shoreline has recovered, and fragile species that rely on a healthy river ecosystem are flourishing.<sup>1</sup>

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<sup>1</sup> <https://www.london.ca/residents/Environment/Rivers-Creeks/Documents/2014-Wharnclyffe-AODA.pdf>

## Ecological Recovery of a River System:

While a structure like Fanshawe Dam helps to protect public safety and property within the city; Springbank Dam serves no purpose other than to create a reservoir intended for recreational use. The Thames River itself is one of the most ecologically diverse systems in Ontario with over 90 species of freshwater fish, including 11 that are identified by the Committee on the Status of Endangered Wildlife in Canada as threatened or at risk. As quoted in a report published by Chris Bunt of Biotactic Research, Inc. the dam closure has potential to cause at least two major negative ecological impacts:

1. *River fragmentation and blockage for fish migrating upstream to spawn or feed.*
2. *The 55 hectare run-of-the-river impoundment may create conditions that encourage silt deposition and oxygen depletion that renders the river unsuitable for many fishes and decreases survival of fish eggs and larvae<sup>2</sup>*

If the stronger swimming common fish like Smallmouth Bass and White Suckers are avoiding or struggling with passage over the doors of the dam in a lowered position we must take into consideration how the low-flow summer reservoir is detrimental to the habitat requirements and passage capabilities of other more sensitive species like Bigmouth Buffalo, Spotted and Redhorse Suckers.

The City of London was informed in writing by the Ministry of Natural Resources and Forestry (MNRF) on November 25<sup>th</sup>, 2015 that plans to repair the dam may be premature and it would be beneficial to update and/or undertake the existing Municipal Environmental Assessment (EA) to allow for community consultation and reassessment of potential social, economic and environmental impacts, as well as potential alternatives. Any work will also require new approval under the Lakes and Rivers Improvement Act (LRIA) and Endangered Species Act of 2007, due to known occurrence of Species At Risk in the vicinity of Springbank Dam. According to the LRIA:

2. (1) *For the purpose of subsection 14 (1) and section 16 of the Act, approval is required,*
  - (a) *to construct or decommission a dam that holds back water in a river, lake, pond or stream to raise the water level, create a reservoir to control flooding or divert the flow of water;*
  - (b) *to make alterations, improvements or repairs to a dam that holds back water in a river, lake, pond or stream to raise the water level, create a reservoir to control flooding or divert the flow of water, if the alterations, improvements or repairs may affect the dam's safety or structural integrity, the waters or natural resources.<sup>3</sup>*

It has now been confirmed by both the Upper Thames River Conservation Authority (UTRCA), MNRF, and the Department of Fisheries and Oceans that this recovery was not limited to fisheries. Having the gates open year round allowed for a dramatic improvement in the overall river health that is visually evident with migratory birds, turtles, snakes and mollusks. <sup>4</sup>

The position of the UTRCA in this process is not without complexities and should be applauded for consistently focusing on conservation during the years of the dam not be operational without any certainty that their efforts would not be wasted:

*"Our board of directors has London members on it, and we've been aware for a long time that removal wasn't really something the city was interested in entertaining," says Ian Wilcox, general manager of the Upper Thames River Conservation Authority. "So our position defaulted to that." He admits, however, that the decision has backfired somewhat. "The Springbank Dam hasn't been great for our reputation locally," he says. "There have been questions as to why we didn't, as environmental advocates, push harder for the removal of the dam, recognizing there are environmental benefits. That's something we're reflecting on." He's been fighting the*

<sup>2</sup> [http://www.biotactic.com/Springbank\\_Dam\\_and\\_Fish\\_Movement\\_2008.htm](http://www.biotactic.com/Springbank_Dam_and_Fish_Movement_2008.htm)

<sup>3</sup> <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTExMDM4&statusId=MTcwNjM5>

<sup>4</sup> <http://www.ontario.ca/laws/statute/07e06>

Springbank Dam for more than three years. "I've always believed that when people are involved in conservation, they should do their job," he says.<sup>5</sup>

On December 23<sup>rd</sup>, 2015 Ian Wilcox mentioned in a radio interview with Crag Needles:

*I would say over the intervening time the rivers done an incredible job of repairing and healing itself and certainly if you walk along there now the banks are re-vegetated, even the river itself has changed. I mean it's not mud flats anymore, its gravel bars and new islands and certainly the wildlife and the aquatics have taken advantage of the new opportunities, the new habitat. So, from my point of view, a purely environmental perspective, it looks and is a lot healthier.<sup>6</sup>*

In 2015 the UTRCA identified a record 214 nests of spiny soft-shelled turtles, and incubated over 3000 eggs to be hatched and released. This species of turtle takes over 12 years to reach sexually maturity and it puts London on the map as one of the only communities in North America that is actually reversing the decline of this COSEWIC identified threatened species. Flooding the river valley during the summer with a repaired Springbank Dam would destroy their nesting grounds upstream thereby causing destruction of habitat and reversing the progress that has been made.<sup>7</sup>

According to the "Aquatic Species at Risk in the Thames River Watershed, Ontario" published in 2004;

*Habitat alteration is one of the greatest threats to freshwater mussels. Dams alter substrate composition, temperature regimes, water chemistry and dissolved oxygen concentrations in downstream areas, causing an accumulation of silt, which smothers mussels, in the impoundments and separate mussels from their fish hosts. Changes in the normal water temperature cycles can alter reproduction, cause loss of glochidia and delay mussel development."<sup>8</sup>*

### **The Economics and Social Impact of Springbank Dam.**

If we repair the dam there are already concerns being raised by city staff regarding whether there will need to be expensive changes made to the design of the doors to prevent future failures. City lawyer Geoff Belch has stated: "The city believes, based on what their experts have said, that the dam is a difficult fix because if you just fix the hinge, it is likely to fail and any of the gates could fail."<sup>9</sup>

The Springbank Dam rehabilitation has already far exceeded the budgeted cost to build it and the South Banks Erosion Works portion has not broken ground yet (est. \$500,000). There will be additional costs to restore fish passage and attraction to the status quo or better post construction (est. \$1,000,000).<sup>10</sup>

The great thing about this period without an operational dam, is that we have had an opportunity to see how the Thames can rebound when given a chance. The river ecosystem has improved, threatened species are recovering, thousands of Londoners have continued to enjoy the river and parks recreationally, businesses have prospered and the London Rowing Club have continued their success at the Fanshawe National Rowing Center.

<sup>5</sup> [http://www.thestar.com/news/2007/04/08/troubled\\_waters.html](http://www.thestar.com/news/2007/04/08/troubled_waters.html)

<sup>6</sup> <http://www.am980.ca/the-craig-needles-show/>

<sup>7</sup> <http://thamesriver.on.ca/2015/08/19/record-year-spiny-softshell-turtles-hatching-august-19-2015/>

<sup>8</sup> <http://www.dfo-mpo.gc.ca/Library/316802.pdf>

<sup>9</sup> <http://www.ourlondon.ca/news-story/4308039-springbank-dam-lawsuit-could-be-left-waiting-until-2015/>

<sup>10</sup> <http://thamesriver.on.ca/wp-content/uploads/FloodStructures/SpringbankDam/SpringbankDamRehabilitation-EA-Report-2003.pdf>

We trust that the City of London and agencies involved will thoroughly and impartially review the potential future economic, social and environmental costs associated with any future with Springbank Dam. We hope that Mayor and Council will take time to read some of the written comments from our digital petition<sup>11</sup> and ultimately decide that decommissioning Springbank Dam is in fact the most cost effective and environmentally responsible option that also delivers the greatest social benefit to the community for recreational use and so much more.

Our coalition of organizations would like to make a formal request that:

- a) The City of London initiate a series of public consultation sessions in the coming months to give Londoners, business and other groups, along with members of surrounding communities, including the Chippewas of The Thames First Nation, the opportunity to provide feedback on whether the City should repair or decommission Springbank Dam.
- b) The City of London provide disclosure of the direct and indirect costs to taxpayers to date including but not limited to initial planning and construction, recent inspection and upkeep, as well as legal fees.
- c) Should the decision be made to decommission Springbank Dam, that the City will consider investing the money saved towards preventing future untreated or partially treated wastewater bypasses

Yours in conservation,  
Robert Huber



**Thames River Anglers Association** (63 members)

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**World Wildlife Fund - Canada** (150,000 members)

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**Ontario Federation of Anglers & Hunters** (24,000 members)

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<sup>11</sup> <http://www.gopetition.com/petitions/decommission-springbank-dam/signatures.html>

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**519 Hunting & Fishing Group** (10,984 members)

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**Thames River Cleanup (2,000 Volunteers)**

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**Thames River Rally (50 volunteers)**

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