



**ONTARIO  
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ALLIANCE**

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Scott MacDonald, P. Eng.  
Project Engineer  
City of Cambridge  
50 Dickson Street  
P.O. Box 669  
Cambridge, ON  
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By Email: [MacDonaldScott@Cambridge.ca](mailto:MacDonaldScott@Cambridge.ca)

Re: Riverside Dam Class Environmental Assessment - Speed River  
Update to Preliminary Preferred Alternative

Dear Mr. MacDonald:

The Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for several stewardships, associations, individual and Indigenous members who have come together to protect, conserve and restore riverine ecosystems.

ORA is writing in response to the Riverside Dam Class Environmental Assessment - Update to Preliminary Preferred Alternative, and its call for feedback and comments on recent updates made to the Project File.

**Background:**

ORA is aware that Cambridge City Council recently rejected a recommendation by the Project Team consultants and City staff to Naturalize the Speed River at Riverside Park, as set out in the Municipal Class Environmental Assessment (Class EA) as the preferred alternative.

It is surprising that Council rejected a recommendation that was so well supported by the Project Team, staff and stakeholders, and in a unanimous decision voted to rebuild the dam. It is even more surprising that the Project Team was directed to revisit the Class EA evaluation criteria to align with the direction of Council and members of the public. *“Council has asked staff to identify a process that enables the City to rebuild or repair Riverside Dam.”*<sup>1</sup>

One must question the integrity of a Class EA that can be so easily rewritten to reach a totally different conclusion than the one just a little over two months ago – to go from recommending Naturalizing the river as the preferred alternative, to now recommending that it be rebuilt.

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<sup>1</sup> Riverside Dam Class Environmental Assessment, Report No: 18-066(CD), File No: T-04-060-RI, To: Council; From: James Etienne, P. Eng., City Engineer.



In fact, the cost of rebuilding the Riverside Dam in the 6 March 2018 Riverside Dam Class EA Study Completion to Council<sup>2</sup> was estimated to be \$8.5 million dollars, with Naturalization coming in at \$5.1 million; whereas, the 17 April 2018 staff report to Council<sup>3</sup> indicated an estimated capital cost of +/- \$5.4 million to rebuild, and +/- \$5.3 million to Naturalize. In that short space of time (42 days), the rebuild cost estimate went down by \$3.1 million and the estimated costs for Naturalization went up by \$.2 million.

Additionally, cultural heritage is only one of many required criteria. Consideration must also be given to the environment, water quality, endangered species, the fishery, habitat, hazards, risks, full life-cycle costs, Indigenous consultation and interests, public safety and liability issues.

It appears that the integrity of the Riverside Dam Class EA has been compromised.

### **Resilience to a Changing Climate:**

Naturalizing the Speed River meets all environmental objectives and legislation, would reinstate natural processes, allow transport of sediments downstream, remove a barrier to fish passage and boaters, lower water temperatures, improve water quality, improve fish habitat, restore the fishery to a more diverse and natural population, reduce flooding, increase public safety and improve the rivers resiliency to climate change.

According to a recent NASA and National Science Foundation funded study of more than half of the world's freshwater supply, climate change is rapidly warming lakes and rivers around the world and threatening freshwater supplies and ecosystems.<sup>4</sup>

*"Climate will interact with overexploitation, dams and diversions, habitat destruction, non-native species and pollution to destroy native freshwater fisheries."<sup>5</sup> "Climate warming will adversely affect water quality and water quantity, as well as the magnitude and timing of river flows, lake levels and water renewal times."<sup>6</sup>*

Our rapidly changing climate is a compelling reason to increase the resilience of our freshwater systems for the protection and safety of our communities. It is important to mitigate and adapt to the extremes of climate change as Paul Beckwith, who works on climatology in the Department of Geography at the University of Ottawa said, "We're getting a lot more extreme weather events around the planet, whether that be torrential rains leading to flooding, or really hot and dry temperatures leading to drought. These extreme weather events are much more severe, much more intense, they last longer, they're happening more frequently, and they're happening in areas where they didn't happen before."<sup>7</sup>

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<sup>2</sup> Riverside Dam Class Environmental Assessment Study Completion, Report No: 18-016 (CD), File No: T-04-060-RI, To: General Committee; From: Scott MacDonald, Project Engineer.

<sup>3</sup> Riverside Dam Class Environmental Assessment, Report No: 18-066(CD), File No: T-04-060-RI, To: Council; From: James Etienne, P. Eng., City Engineer.

<sup>4</sup> Study: *Climate Change Rapidly Warming World's Lakes*, 16 December 2015.

<sup>5</sup> Schindler, D.W., 2001. *The cumulative effects of climate warming and other human stresses on Canadian freshwaters in the new Millennium*. *Canadian Journal of Fisheries and Aquatic Sciences*. 58: 18-29.

<sup>6</sup> Schindler, D.W., 2001. *The cumulative effects of climate warming and other human stresses on Canadian freshwaters in the new millennium*. *Canadian Journal of Fisheries and Aquatic Sciences*. 58: 18-29.

<sup>7</sup> National Observer, 8 May 2017, [Here are the climate science benchmarks of the Quebec floods.](#)



Increased intensity of rain and melt events is already challenging manmade infrastructure such as dams like never before, and there is acknowledgement that old dams are becoming enormous liabilities, and significantly increase the risk to public safety.

Drought conditions can place additional stress on riverine ecosystems, while more extreme rainfall will heighten the risk of dam failures, as in October of 2015, when a South Carolina flood breached 18 dams and with rapid release of high volumes of water, resulted in 16 deaths.<sup>8,9</sup> There have also been recent dam failures right here in Ontario – the Gorrie Dam failure last year in Gorrie was the most recent, putting more than 150 property owners at risk.

It is crucial that we recognize the hazards of infrastructure that would put citizens at risk, degrade water quality, threaten our fisheries, or that jeopardize the ecosystem services that healthy rivers provide.

### **Conclusion:**

ORA understands the pressure municipalities are under when communities rally to maintain or rebuild their beloved mill ponds. However, it is up to all authorities and municipalities to take a leadership role that places public safety and landscape scale ecological integrity above local individual or group interests.

Anything we can do now to reduce that risk and any corresponding liability will be a positive for both local communities and the natural environment. Removing the dam would not only save taxpayer dollars in the short-term, but it would eliminate the long-term life-cycle costs of maintaining the dam.

The life-cycle costs associated with the Naturalize alternative are minimal, it avoids the substantial costs of the ongoing management of the contaminated sediment, and significantly reduces the City's short and long-term liability.

Naturalizing the Speed River is also in alignment with the City's Strategic Plan, and ranked highest in consultation with the regulators, agencies, Indigenous communities, and the City's Environmental Advisory Committee – who all expressed strong support for this alternative. There were only two stakeholders out of ten that expressed a desire to keep the Mill Pond.

ORA respectfully submits, that neither the public good, nor the environment are served in a decision to rebuild and maintain the dam. Naturalizing the Riverside Dam would be a strong action for the City of Cambridge to take in ensuring the Speed River and adjacent communities are more resilient to climate change and, most importantly, it would demonstrate that protecting the safety of its citizens is the top priority.

Naturalizing the Speed River at Riverside Park will improve its health and resilience and at the same time reduce public safety risks and liability.

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<sup>8</sup> [18 Dams Breached And Death Toll Rises in S.C. Flooding](#)

<sup>9</sup> [Colorado flood: Dams break in Larimer and Adams counties; overflowing in Boulder.](#)

[http://www.denverpost.com/environment/cj\\_24080336/dams-break-at-rocky-mountain-arsenal-and-larimer](http://www.denverpost.com/environment/cj_24080336/dams-break-at-rocky-mountain-arsenal-and-larimer)



ORA is asking the City of Cambridge to look beyond the pure aesthetics of the dam and pond feature, to the greater long-term health and vitality of a revived and healthy fishery and natural environment, both now and far into the future.

We ask that the decision to rebuild the Riverside Dam be reconsidered, and that the best advice of the City's Project Team and staff be followed – to Naturalize the Speed River.

We would be pleased to meet with you to discuss this further in the hopes of finding the best alternatives for the City, local communities, and the ecosystem of the Speed River.

Thank you for your consideration.

Respectfully,

Linda Heron  
Chair, Ontario Rivers Alliance  
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Dianne Saxe, Environmental Commission of Ontario