ONTARIO RIVERS ALLIANCE

EST. 1986 ANGLERS.ORG THAMES RIVER ANGLERS ASSOCIATION

26 October 2018

Ashley M. Rammeloo, P. Eng
Manager, Engineering
Rapid Transit Implementation Office
City of London
300 Dufferin Ave., PO Box 5035
London, ON N6A 4L9
By Email: ARammeloo@london.ca

Tom Mahood, P. Eng
Project Manager
Jacobs
72 Victoria Street South, Suite 300
Kitchener, ON N2G 4Y9
By Email: Tom.Mahood@jacobs.com

Dear Ms. Rammeloo & Mr. Mahood:

Re: Recommendation of Preferred Alternative for One River Environmental Assessment Stage 2 Springbank Dam Decommissioning

The Thames River Anglers Association (TRAA), the Ontario Rivers Alliance (ORA), and those supporting partners listed below, are pleased to provide our feedback on the recommendations of the preferred Alternative for the decommissioning of Springbank Dam, as set out in the One River Stage 2 Master Plan Environmental Assessment (EA).

Recommendation:

Our organizations recommend choosing Alternative 3 - the Full Removal of Springbank Dam and the naturalization of this section of the Thames River. We submit that full dam removal and naturalization are the preferred solutions from an environmental perspective and would likely prove to be the most cost-effective over the long-term when Life-cycle costs and available provincial and federal funding are considered.

We will go into additional detail below; however, the following must be considered in any preferred option:

- Life-cycle costs (maintenance and repairs over the expected life of the structure, including costs of its eventual removal) must be included in the estimate for any Partial Dam Removal project; whereas, these costs would be eliminated with a Full Dam Removal.
- Fish and boat passage mitigation measures must also be included in any Partial Dam Removal costing.
- The scoring matrix results were very close between the Full Dam Removal and Partial Dam Removal; however, when life cycle costs and fish and boat passage are properly accounted for, we would likely see a very different result in the Scoring matrix.
- Significant provincial and federal funding is available for dam decommissioning and naturalization projects, which would significantly offset the costs associated with full dam removal.

One River Master Plan EA (Presentation of the EA Process):

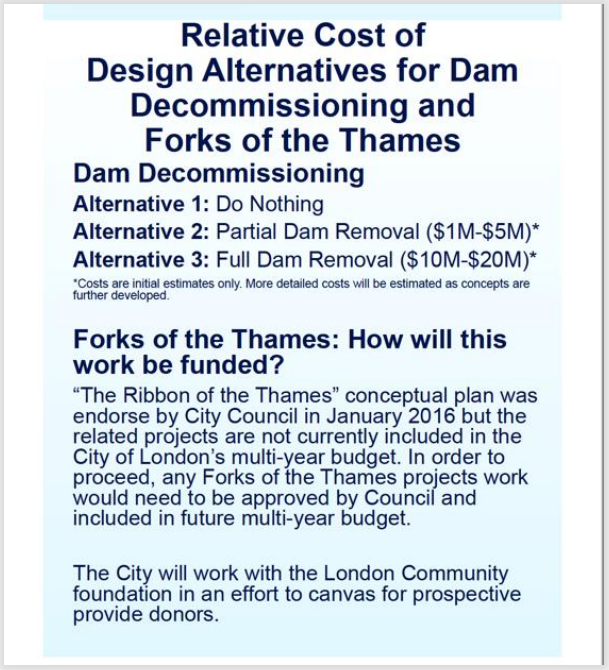
Our organizations have actively participated in this process right from the beginning. We have made our best effort to comment when opportunities arise, and occasionally our feedback has resulted in important changes. However, there is room for improvement with clarity of the process, which will be detailed in our responses to the sections outlined below.

Alternative 3: Full Removal of Springbank Dam:

A significant amount of information that would influence the decision was not shared with the public during this stage.

For instance, the preliminary estimates for the Relative Cost of Design Alternatives for Dam Decommissioning (Fig. 1) were very broad, ranging from $1M to $5M for partial decommissioning and $10M to $20M for full removal; however, no breakdown of those costs was included. Yet the level of detail of the Order of Magnitude Cost Analysis (Fig. 2) for the Ribbon Overlook bridge and softscape terraces at a cost of $7M to $8M, was much more detailed - as shown below:

Fig. 1 – Page 28:



Relative Cost of Design Alternatives for Dam Decommissioning and Forks of the Thames

Dam Decommissioning

Alternative 1: Do Nothing

Alternative 2: Partial Dam Removal ($1M-$5M)*

Alternative 3: Full Dam Removal ($10M-$20M)*

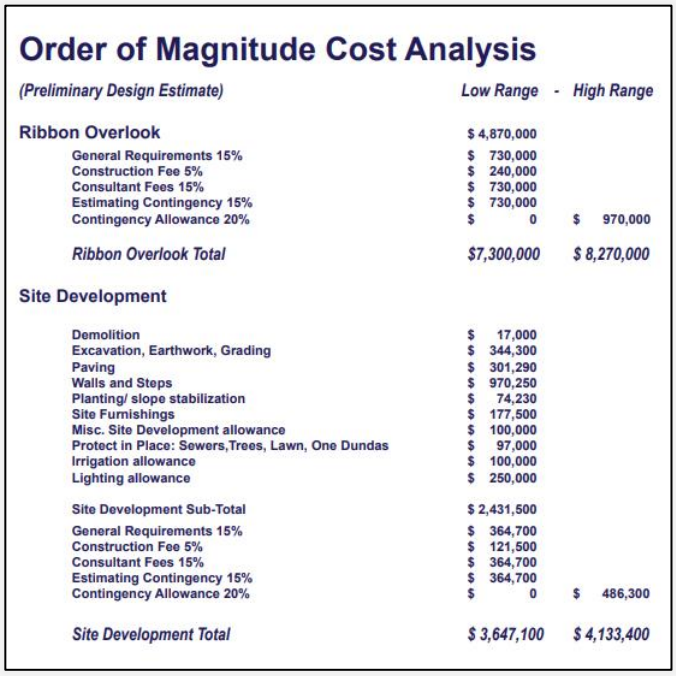
*Costs are initial estimates only. More detailed costs will be estimated as concepts are further developed.

Forks of the Thames: How will this work be funded?

"The Ribbon of the Thames" conceptual plan was endorse by City Council in January 2016 but the related projects are not currently included in the City of London's multi-year budget. In order to proceed, any Forks of the Thames projects work would need to be approved by Council and included in future multi-year budget.

The City will work with the London Community foundation in an effort to canvas for prospective provide donors.

Fig. 2 - Page 3:



Order of Magnitude Cost Analysis

(Preliminary Design Estimate)	*Low Range*	-	*High Range*
Ribbon Overlook	$ 4,870,000		
General Requirements 15%	$ 730,000		
Construction Fee 5%	$ 240,000		
Consultant Fees 15%	$ 730,000		
Estimating Contingency 15%	$ 730,000		
Contingency Allowance 20%	$ 0		$ 970,000
Ribbon Overlook Total	*$7,300,000*		*$ 8,270,000*
Site Development			
Demolition	$ 17,000		
Excavation, Earthwork, Grading	$ 344,300		
Paving	$ 301,290		
Walls and Steps	$ 970,250		
Planting/ slope stabilization	$ 74,230		
Site Furnishings	$ 177,500		
Misc. Site Development allowance	$ 100,000		
Protect in Place: Sewers,Trees, Lawn, One Dundas	$ 97,000		
Irrigation allowance	$ 100,000		
Lighting allowance	$ 250,000		
Site Development Sub-Total	$ 2,431,500		
General Requirements 15%	$ 364,700		
Construction Fee 5%	$ 121,500		
Consultant Fees 15%	$ 364,700		
Estimating Contingency 15%	$ 364,700		
Contingency Allowance 20%	$ 0		$ 486,300
Site Development Total	*$ 3,647,100*		*$ 4,133,400*

It is difficult to understand the reason for the extremely high ball park estimates for full dam removal, and the cost estimates comparing partial to full decommissioning were not detailed at the PIC consultation sessions for Stages 1 or 2. Consequently, we have requested more detailed cost information on Dam Removal Alternatives 2 and 3. We were assured that those figures would be made public prior to the report being delivered to the City of London Civic Works Committee; however, for the sake of transparency and informed comments, that information should have been made available at this juncture.

There are also life-cycle costs (maintenance and repairs over the expected life of the structure, including costs of its eventual removal) associated with a proposed structure bridge/lookout that must be factored into any cost-comparison between Alternatives 2 and 3.

These cost details are very important due to the structure of the Stage 2 Alternatives Preliminary Scoring Summary that was used to evaluate the preferred options.

As noted in Fig. 3: Page 18:

Springbank Dam:

- ✓ Partial Dam Removal scored a 4.2 under the Technical & Economic column
- ✓ Full Dam Removal scored a 2.7 under the Technical & Economic column

Even a minor adjustment of 1.0 +/- those alternatives would adjust the average enough that the recommended option could change the outcome of the preferred recommendation.

- ✓ The average score for Partial Dam removal was 4.0
- ✓ The average score for Full Dam Removal was 3.8

Stage 2 Alternatives Preliminary Scoring Summary

	Natural Environment	Social/ Cultural	Technical & Economic	Average
Springbank Dam				
Alternative 1: Do Nothing	2.8	3.0	4.3	3.4
Alternative 2: Partial Dam Removal	3.7	4.1	4.2	4.0
Alternative 3: Full Dam Removal	4.8	3.9	2.7	3.8
Forks of the Thames				
Do Nothing	2.7	2.3	3.7	2.9
Ribbon				
Alternative 1: Walkway Supported by Piers in the Thames	1.7	3.6	2.0	2.4
Alternative 2: Suspended Walkway	2.7	4.0	2.7	3.1
Alternative 3: Kensington Bridge Extension and Lookout	3.0	2.9	2.2	2.7
Alternative 4: Land Based Walkway	2.7	3.1	2.8	2.9
Terraces				
Alternative 1: Hardscape	2.0	4.1	2.3	2.8
Alternative 2: Softscape	3.2	4.0	3.1	3.4
River Management Plan				
Alternative 1: Existing Conditions	2.7	1.9	2.9	2.5
Alternative 2: Naturalized River Corridor	4.5	3.1	3.4	3.7
Alternative 3: Strategic Access and Use in the River Corridor	3.8	4.3	3.4	3.8
Alternative 4: Enhanced Active Use and Access to the River Corridor	2.2	4.4	2.9	3.1

This is a narrow enough margin that more detail and transparency of those estimated costs is a very reasonable request and should be expected as part of an evidence-based decision process with high expectations of accountability to show how they were factored into the recommended preferred alternative. We submit that if the true costs of partial decommissioning (i.e. including life-cycle costs and removal of doors or provision for effective fish passage) had been included, then the Full Dam Removal score would likely have been higher than the partial dam removal score.

It is also important to acknowledge at this juncture that over $5M has been set aside from the Springbank Dam lawsuit settlement to offset the costs associated with either preferred option. This should be clearly communicated to the public and stakeholders during this stage of the process and be reflected in the considerations of the preferred alternatives.

Additionally, it is important to disclose and acknowledge that significant matching funding is available through both the provincial and federal governments for dam removal if the City was to proceed with full decommissioning as the preferred alternative. A key funding source for dam removal is the federal Department of Fisheries and Oceans. Their current program, the Recreational Fisheries Conservation Partnership Program ends on March 31, 2019; however, it is anticipated that this program will be revitalized with a new application process announced in 2019. The TRAA has already received commitments from Members of Provincial and Federal Parliament that they would work directly with the City of London to secure these grants to help offset additional costs beyond what was reserved from the lawsuit settlement.

Full decommissioning of Springbank Dam is a one-time cost that would restore riverine flows and processes and permanently eliminate any public safety risk/liability presented by a public walkway or bridge. Additionally, the regulators would likely be very supportive throughout the permitting process for dam removal.

Selection of Preferred Alternative 2: Partial Dam Removal:

We do not support the preferred preliminary Alternative 2, to partially decommission Springbank Dam. This alternative would leave the concrete foundation apron, and potentially gate/s in place, which would impede fish and boat passage during low-flow conditions over the long-term.

Three years of post-construction fish movement data indicated that the lowered gates resulted in an increase in water turbulence which was shown to negatively impact attraction and passage efficiency rates compared to the pre-study baseline in 2006. If the gates are left on the dam it would not resolve these concerns and could face additional fish and boat passage mitigation costs if it is identified as a permit requirement.

In contrast, removing the gates and foundation apron would make a substantial improvement in riverine health and ecology by opening up flow and connectivity for aquatic life and boat passage. It would also lessen the cumulative effects this manmade structure and other upstream urban and industrial activities have had on the lower Thames River ecosystem over the years. Permitting may also be challenging if the gates are left in the river.

There is also uncertainty in Alternative 2, in that the option of leaving the gate/s in place is left open - will they be removed, or won't they? Leaving the gate/s in the river would mean the dam repair issue could be reopened again.

PIC and Public Engagement:

We have for the most part been impressed with the City's efforts to engage the public, and consultation has been effective at most stages. However, it is crucial that the City provide a clear and transparent process, along with detailed information to ensure the evidence corresponds with the scoring and preferred solution.

Many of our members and organizational partners attended the PIC sessions, have reviewed the documentation online, and have asked numerous questions in person and by email. For the most part the feedback was positive; however, some felt that their concerns regarding fish passage, the gates and concrete footings of the dam itself, and requests for additional detailed reports were not responded to in an appropriate or timely manner. It is impossible to make an informed judgement until we receive the more detailed reports outlining the costs and other details related to fish passage and dam removal. Unfortunately, the information was very lacking.

In closing, we encourage Members of Council and the Civic Works Committee to reject Alternative 2 and approve Alternative 3 - the Full Removal of Springbank Dam and the naturalization of this section of the Thames River. We submit that full dam removal and naturalization are the preferred solutions from an environmental perspective and, everything considered, is likely the most cost-effective over the long-term. Full removal of Springbank Dam would be a one-time cost that would restore riverine flows and processes and permanently eliminate any public safety risk/liability presented by a public walkway or bridge.

Finally, the TRAA, ORA and partners would be pleased to work with the City as part of a Steering Committee to address some of the environmental and funding challenges by applying to multiple funding sources as partners to a dam decommissioning project. ORA recently partnered with the Ministry of Natural Resources and Forestry and the Credit Valley Conservation Authority in a dam removal project on the West Credit River which raised $150,000 for design removal and site restoration. We would be pleased to work with the City of London to find creative solutions to any financial or other barriers to full decommissioning.

We thank you for this opportunity to comment!

Respectfully,

Robert Huber
President, Thames River Anglers Association
Vice-Chair, Ontario Rivers Alliance
619-630-1892
www.Anglers.org
www.OntarioRiversAlliance.ca

Supporting Organizations:

Ontario Nature
Anne Bell, Director of Conservation and Education
416-444-8419 x 239
AnneB@OntarioNature.org

Western Ontario Fish & Game Protective Association
Stan Gibbs, President
(519) 681-2370
PresidentWOFGPA@gmail.com

Trout Unlimited Canada
Kelly Mason, Ontario Biologist
519-736-0888
KMason@TUCanada.org

OFAH Zone J (23,500 Members)
Felix Barbetti, 1st Vice
(905) 892-4381
FBarbetti@cogeco.ca

Freshwater Future Canada
Jill Ryan, Executive Director
231-348-8200
Jill@FreshwaterFuture.org

Canadian Wildlife Federation
Nicolas Lapointe, PhD,
Senior Conservation Biologist – Freshwater Ecology
877-599-5777
NLapointe@CWF-FCF.org

WWF-Canada
Elizabeth Hendriks, Vice President, Freshwater
416-489-8800, ext. 7354
EHendriks@WWFCanada.org

Thames River Cleanup
Todd Sleeper, Primary Organizer
519-229-6926
TD.Sleeper@hotmail.com

Earthroots
Amber Ellis, Executive Director
416-599-0152 x 11
Amber@Earthroots.org

Thames River Rally
Tom Cull, Founder
519-432-4067
Goodaywalter@gmail.com

Paul Roedding Photography
Paul Roedding, Owner
519-645-8612
PaulRoedding@gmail.com

Cc: Ed Holder, Mayor
Michael van Holst, Councillor
Shawn Lewis, Councillor
Mo Salih, Councillor
Jesse Helmer, Councillor
Maureen Cassidy, Councillor
Phil Squire, Councillor
Josh Morgan, Councillor
Steve Lehman, Councillor
Anna Hopkins, Councillor
Paul Van Meerbergen, Councillor
Stephen Turner, Councillor
Elizabeth Peloze, Councillor
Arielle Kayabaga, Councillor
Steve Hillier, Councillor
Cathy Saunders, City Clerk's Office – CSaunders@london.ca
Chief Henry Myeengun, Chippewas of the Thames First Nation – Myeengun@cottfn.com
Dean Allison, MP - Dean.Allison@parl.gc.ca
Sam Oosterhoff, MPP - Sam.Oosterhoff@pc.ola.org
Dianne Saxe, Environmental Commissioner for Ontario – Commissioner@ECO.on.ca