

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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December 22, 2015

His Worship Mayor Matt Brown
Mayor, City of London
Suite 214 – 300 Dufferin Avenue
London, Ontario
N6G 1Z2

Dear Mayor Brown:

On behalf of the Ontario Federation of Anglers and Hunters (OFAH), its 100,000 members, subscribers and supporters, and 725 member clubs, we are writing to the City of London in relation to the long-standing issue of the Springbank Dam, and the unresolved debate on whether it should be repaired or decommissioned. This communication is intended to highlight the potential for this decision to impact matters at both the local and international level (i.e. Great Lakes basin).

The Thames River, a designated natural heritage river, has undergone a significant ecological improvement since the failure of the Springbank Dam nearly a decade ago. The condition of highly valued fisheries (i.e. Walleye and Muskellunge) have improved in the area both upstream and downstream of the former impoundment caused by the dam. Additionally, the failure of the dam has revealed habitat for the Spiny Softshell Turtle (*Apalone spinifera*), which is considered threatened under the Endangered Species Act. Should the dam be rehabilitated, this habitat would be submerged by the upstream reservoir and this sensitive species would be displaced.

The Springbank Dam does not serve an operational purpose such as flood control and is simply in-place to create a recreational reservoir. Considering that the reservoir harboured toxic material, promoted the growth of toxic algae, degraded the overall health of the downstream waters, and would be in direct contradiction to international efforts under the Great Lakes Water Quality Agreement (GLWQA) to improve the drinking water quality for communities bordering Lake Erie, the decision to not repair the dam should be easy to make.

From a local perspective, it is difficult not to consider the potential health risks associated with the re-establishment of the upstream reservoir created by a fully-functioning Springbank Dam. A technical report by Trout Unlimited Canada (D'Amelio 2007) showed significantly elevated levels of total phosphorus and fecal coliforms (i.e. *E. coli*) that exceeded provincial water quality targets. The data collected during this important study suggested that the reservoir created by the operation of the Springbank Dam was in fact acting as a sink for phosphorus and *E. coli*. The significance of this fact lies within evidence suggesting that the turbulence associated with the draining and refilling of reservoirs release these stored substances and re-suspend them in the water column. In the past, when the Springbank Dam was operating as intended, the reservoir was collecting large amounts of nutrients and toxic substances in the substrate and throughout the water column. This creates an ongoing health concern for the citizens of London who may be exposed to these conditions, and creates a significant seasonal flushing of toxic substances downstream when the reservoir is drawn down. This flushing has the potential to cause significant downstream effects and contributes to the seasonal algae blooms at the river's outflow.

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Beyond the ecological considerations and the priorities of the immediate London area, Environment Canada (EC) has proposed binational phosphorus load reduction targets for tributaries to Lake St. Clair and Lake Erie. The Springbank Dam, when operating, has been shown to contribute to conditions that favour the production of cyanobacteria (i.e. anoxia and nutrient impoundment), as well as the buildup of macronutrients such as Phosphorus and Nitrogen. As part of the proposed binational targets, the Thames River was specifically identified as a priority river due to the seasonal algae blooms where it empties into Lake St. Clair. As such, the OFAH suggests decommissioning the Springbank Dam to align with our domestic obligations under the GLWQA and Ontario's direct involvement in the proposed improvement in the water quality in Lake Erie.

Should the City of London move forward with the rehabilitation of the Springbank Dam, in what way would the issue of downstream water quality degradation be dealt with? Surely any decisions regarding the outcome of the Springbank Dam must also consider domestic obligations under the GLWQA. The subsequent impacts will be long-lasting and far-reaching and must be addressed. Transparency in the decision-making process is essential so that the public, as well as stakeholders, can identify how an outcome was reached.

The Thames River, Lake St. Clair and Lake Erie have highly valued recreational and commercial fisheries; they provide drinking water for millions of people and are shared internationally. This issue has significant implications inside and outside the City of London and must be evaluated from public health, water quality and fisheries perspectives.

The OFAH would like to thank you for taking the time to consider our perspectives on this important issue and we will remain engaged in this situation until it is resolved.

Yours in Conservation,



Tom Brooke, M.Sc.
Fisheries Biologist

TB/jb

cc: Teresa Armstrong, MPP London
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Literature Cited:

D'Amelio, S. 2007. Preliminary Water Quality at Springbank Dam, Thames River, London, Ontario. Trout Unlimited Technical Report No.: ON-020