



## International Rainy and Namakan Lakes Rule Curves Study Board

### Public Engagement

#### Comment on Rule Curve Methodology (closed Oct. 14)

The water levels of Rainy Lake and the Namakan Chain of lakes are regulated within upper and lower limits set by the International Joint Commission (IJC) – these limits are known as a “Rule Curve” that is meant to maintain sufficient water levels for a wide variety of uses and interests. With the latest rule curve having been set in 2000, the IJC committed to reviewing those upper and lower limits in 2015 and has appointed a ***Rainy and Namakan Lakes Rule Curves Study Board (Study Board)***. This Study Board will provide the IJC with scientifically supported recommendations for the modification or retention of the 2000 Rainy and Namakan Lakes rule curves, considering the extensive research that has been done since 2009 and prior on the hydrologic, hydraulic, cultural, economic and environmental risk factors. The geographic scope of this study comprises Rainy Lake and the Namakan Chain of lakes, the **connecting channels** and the Rainy River downstream of Rainy Lake to Lake of the Woods, and the **riparian** areas adjacent to these water bodies.

At this initial phase of the project, the Study Board feels very strongly that key individuals and organizations within the study area should be given the opportunity to provide comment on the **evaluation** methodologies in the ***Terms of Reference*** provided by the IJC - before it develops an evaluation approach.

Specifically, we would like your input on:

- Suggested changes to regulation alternatives being considered
- Historical data/studies you feel would be useful

Additional approaches or factors to consider:

- Impacts of factors most important to you
- Future plans and activities that could be affected by water levels
- Other considerations not included in the Directive from the IJC

***Submit Comments***

Comments on the evaluation methodologies provided by the IJC, contained within the Terms of Reference, may be submitted **by October 14, 2015** in written form either by email to [saunderesk@ottawa.ijc.org](mailto:saunderesk@ottawa.ijc.org) or using the blue button below.

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### Public Comments

**Tony Nagurski** 14th October 2015 17:36:12

Illinois, Roselle,

The Rule Curve Methodology is good in that it provides opportunities for interested parties to review and critique the results at various level of the review process. I think the comments from the stakeholder meetings has indicated a concern that the review process will only tweak the rule curve, which is necessary as an interim solution, but will not address the limitations in the Rainy-Namakan watershed which prevent the IJC/IRLWWB/Water Level Committee from providing adequate control during abnormal meteorological events. These limitations include inadequate instrumentation in the watershed, lack of information and control of flows from the 6 unregulated dams on Rainy Lake, and the pinch points in Upper Rainy River above the dam. These need to be addressed. Better control of lake levels can be achieved by making timely decisions on gate settings based on measured rainfall in the basin, rather than guessing and then trying to confirm the guess based on lake levels and water flow. This information would also help predict water flow down stream from the I. Falls dam. My concern with the SVM is the with the weighting process and that the IJC may not adequately appreciate the effect of high/low water level on the affected people and the economy of the area. Your report on high water in 2014 essentially said that local governments shouldn't let people build on the lake. In an effort to be all inclusive using the SVM, it must be remembered that the fish and mussels don't pay taxes. People who live on and use the lakes spend money, pay taxes and support the U.S. and Canadian governments.

**Tom Dougherty** 14th October 2015 14:56:59

MN, Ranier,

2000 Rule Curve Study Approach Input

[Attachment](#)

**Doug Brown** 9th October 2015 09:20:06

Ontario, Fort Frances,

The flooding of the Upper Rainy River and Rainy Lake is very important to the community of Fort Frances. Also establishing an elevation for dock structure should be constructed too along the shoreline abutting Sand Bay (Rainy Lake) is also very important to the adjacent property owners. When considering the weight of evidence model VS the Shared Vision model for evaluating the 2000 upper and lower rule curve for Rainy Lake, the shared vision model approach is probably the preferred choice. As the "Climate Change" parameter would be taken into consideration under this model. Climate change consideration is a term being used quite extensively by the provincial government these days when evaluating funding requests for municipal infrastructure upgrade projects or when the Ministry of Environment and Climate Change issues a certificate of approval to a municipality for a new storm sewer system. As such

the Climate Change parameter should be one of the highest weighted factors to be considered under the shared vision model approach and extensively assessed under this model. The June 2014 flooding disaster is a good example where the weather and climate conditions were such where the elevation of Rainy Lake was above the upper limit of the 2000 rule curve for several months and one wonders if this situation could have been prevented by following an adjusted 2000 rule or reacting quicker to lowering the Rainy Lake elevation. One realizes that forecasting or predicting the weather patterns is a best guess based on reviewing historical data and modeling certain parameters. However weather predictions are still 100 % out of whack. Evaluation of the 2000 rule curves for Rainy Lake is of the same category as trying to predict the long term weather patterns. In closing as stated above avoiding flooding of the Upper Rainy River and Rainy Lake is very important to the community of Fort Frances and any adjustment to the 2000 rule curves for Rainy Lake should be in the best interest of protecting the community from flooding going forward. If you require any additional information, please feel free to contact me. Doug Brown, P. Eng. Operations & Facilities Manager 320 Portage Avenue, Fort Frances, Ontario Town of Fort Frances