



International Rainy and Namakan Lakes Rule Curves Study Board
Public Engagement

Comment on Rule Curves Review Study Strategy

Rule Curves Review Study [Strategy](#) Available for Public Review and Comment

February 25 to March 21st 2016

The International Rainy and Namakan Lakes Rule Curves Study Board has finalized its [Study Strategy](#) that outlines and defines the study board's intended approach for conducting its review of the 2000 Rainy and Namakan Lakes rule curves.

Key **stakeholder** input from the meetings the Board held in September 2015 have been incorporated into this strategy and it has been peer reviewed and shared with the Rainy-Namakan Rule Curve Public Advisory Group.

The report provides a brief background on the Rainy River basin and the history of Rule Curve-based regulation there, the scope and aims of the Study Board in conducting its review, and the detailed methodology the study board will use.

As you review the document, you may want to consider if you think the strategy is missing any necessary components and will accomplish the study's goals.

Public Comments

Voyageurs National Park 22nd March 2016 15:45:42

MN, International Falls,

Attached

[Attachment](#)

Charlene Mason 22nd March 2016 12:20:48

NA, NA,

Attached.

[Attachment](#)

Ontario Ministry of Natural Resources and Forestry 22nd March 2016 12:18:21

Ontario, NA,

Comments attached.

Attachment

Rainy Lake Property Owners Association 22nd March 2016 12:14:33

MN, Ranier,

Comments attached

Attachment

Mike Hirst 21st March 2016 22:48:58

MN, Baudette,

The study strategy seems sound in its foundation. Good job. Through the strategy there are multitudes of information and data to digest, not to mention the various interests throughout the watershed to take into consideration. The strategy seems complex, however it mirrors the system. The water levels in the reservoir system that are controllable by the rule curves are the main focus for the strategy. As many of the studies reviewing the 2000 rule curve are focusing on habitat, it is prudent to be mindful of "correlation does not lead to causation" and that Serengeti Rules may also apply. The studies do reflect reasonable scientific methods, assumptions and supported findings. One thought I had (not sure if it had been evaluated through the existing studies) was to find the years when strong year classes of various fish species were documented by the MN DNR and OME through Creel and other fish surveys. Using this data of strong year class scenarios, hindcast what the water levels would have been during those strong year class spawning times (checking the historic water temp and water level records to further validate the habitat studies.

John D Bartlett 21st March 2016 18:09:26

MN, International Falls,

Comments on the Rainy/Namakan rule curve study of 2015-16. First, it should be noted that management of the lake levels overall has been very effective since 2000 with few exceptions. 2014 was, of course, one of those, when Rainy was sacrificed to Kab/Namakan interests. In review of the 2000 curves on Rainy, please look again at the effects of raising the lake level above the 1970 curves in the spring. The ACERS report used to develop the 2000 rule curves indicated a substantial increase in flooding risk but I don't know if the ACERS work was redone after the 2000 rule curves were adopted. There were some small changes from the proposed curves made as adopted which may have reduced the risk. It would be helpful to the public if a risk prediction could be made for 2016 work. The public does not adequately understand the difficulty of managing the levels when a high intensity rainfall event occurs. Try to make that clearer in presentation of any new curve. Suggestion: model a 6" rainfall in two days with saturated soils and swamps. I was told that the modeling software won't do that directly but some creative input and several runs might give some helpful data. No one on the volunteer advisory board is a sailor although two sailors volunteered, so those interests are not represented on that board. The declining levels through the summer and fall determined by the 2000 curves are potentially adverse to sailors due to low water. Sailing season on Rainy from a weather perspective ends in October. If the lake level approaches the bottom rule curve from Aug 1 on, access first to docks and then to launch sites is limited so sail boats must be pulled out early. Thanks for your consideration, John D. Bartlett P.E Ret. 40 yr resident and boater on Rainy, 30+ yr Rainy sailor.

Stephen Blair 10th March 2016 10:15:57

MN, Int'l Falls,

I am member of the IJC Community Advisory Group (CAG). I have been employed as a Zoning Official with Koochiching County for more than 20 years and over the years have regularly attended the IJC Annual meetings. My duties as a zoning official include issuing construction permits on the US side of the Rainy Lake & Rainy River basin's. One component of issuing permits is to assure that the construction avoids sensitive flood plain area's. This has been challenging due to the fact the most current Koochiching County Flood Hazard Boundary (FEMA) Map for Rainy Lake is dated 1977. In the last year the county GIS maps have included 2ft LIDAR elevations as an overlay to it's aerial photo inventory. I did make a comment at the IJC public hearing on March 8, 2016 that it would have been nice to have an aerial flight done of Rainy Lake during the flood event of 2014 which would have provided regulation officials a snap shot in time. This would be a valuable tool given the fact our FEMA map's are so out dated. In closing, I have been listening to both sides about the pro's & con's in changing the 2000 Rule Curve and prefer they leave it as is. More & more frequently National news events show catastrophic flood events all over the world. The experts testified that no matter what the rule curve the local flooding event experienced in 2014 on Rainy Lake could not have been avoided. As mentioned at the March 8, 2016 public hearing the process used in changing from the 1970 to the 2000 Curve lasted more than 8 years. It was not done willy nilly. 'Thank You'

carol schumacher 8th March 2016 19:05:49

mn, international falls,

I'm attending the meeting tonight and hope I will hear some information that will indicate that the IJC has listened to the residents of Rainy Lake. We need to start at the low end of the rule curve in the Spring and we need water held longer in the summer in Namakan, not an immediate draw-down in June. Having only had to place barrels on our docks twice in the 28 years from 1972 to 2000, I find it very strange that we had to put barrels out at least 8 times from 2000 to the present. The rule curve was the deciding factor in my mind, not rain or snowpack or docks that are "too low", according to Ed Eaton.