

CHRISTIE LAKE ASSOCIATION INC.

P. O. Box 20058, Perth, Ontario, K7H 3M6



The Honourable Catherine McKenna MP
Ministry of Environment and Climate Change Canada
200 Sacré-Coeur Boulevard
Gatineau, QC
K1A 0H3

5 September 2017

Re: Christie Lake residents' concerns: Bobs Lake Dam at Bolingbroke is unsafe and mismanaged

Dear Minister McKenna,

The Directors of Christie Lake Association Inc. (The Association) formed the Christie Lake Association (CLA) Water Level Committee (The Committee) in July of 2017 after the unprecedented flooding in May 2017 on Christie Lake damaged property, affected livelihoods, disrupted wildlife and the environment. Located in Lanark County Ontario, Christie Lake is on the Tay River watershed, downstream of the Bobs Lake Dam at Bolingbroke (Bobs Lake Dam) and is part of the greater Historic Rideau Canal System. Flooding on Christie Lake and along the Tay River was caused by excessive water discharge and a loss of control of the Bobs Lake Dam which is managed by Parks Canada.

The Association is an Ontario not-for-profit corporation incorporated in 1976 the objects of which include the advancement and promotion of conservation and the protection of the environment and ecology in the vicinity of Christie Lake and the Tay River. Not only did the flooding in May 2017 cause extensive property damage but is contrary to the objects of the Association. Recent flooding at Christie Lake, the prospect of replacing the Bobs Lake Dam and collateral issues about water management by Parks Canada in the watershed have attracted the Association's attention.

At the Association's Annual General Meeting, July 15, 2017, its members concerns were heightened when Parks Canada representatives stated the following:

- i. The Bobs Lake Dam is unsafe
- ii. The Flooding of Christie Lake and the Tay River in May 2017 was beyond Parks Canada's control, and
- iii. Water management policy and operational strategy subsequent to installation of the new Bobs Lake Dam at Bolingbroke (New Dam) would not attempt to avoid future flooding

The Committee seeks your guidance in contacting appropriate officials at Parks Canada to receive their immediate assurance that an accidental catastrophic failure of the existing Bobs Lake Dam is not imminent and that control of the Dam can and will be maintained. We request engagement with Parks Canada on water issues and prospective management of the New Dam.

Unsafe Dam

Bobs Lake Dam was constructed in 1930 with maintenance and repairs throughout the years. In 2015, Bobs Lake Dam was considered for further repair, but Parks Canada determined that replacement was required. Arguably, Bobs Lake Dam has been unsafe for some time as was stated by Morton and Partners Limited in a Geotechnical Report dated March 1984 which was commissioned by Parks Canada. The Committee believes that Bobs Lake Dam should be managed currently and should have been managed retrospectively as an impaired public structure. It has not been. In 2002, 2014 and 2017 Parks Canada lost control of Bobs Lake Dam, that is three times in the recent fifteen years that Bobs Lake Dam was over-topped resulting in damage to the dam and surrounding embankment, loss of discharge control and downstream flooding. Dam safety is an urgent matter. We assume Parks Canada has produced an analytical flood simulation predicting the outcome of a catastrophic dam failure. Undoubtedly, such an outcome would be devastating. All parties, including the public, should review without delay such a simulation and make an immediate pledge to do what is necessary to avoid such a catastrophe – no matter how small Parks Canada argues the probability of occurrence might be.

Christie Lake and Tay River Flooding is Not Beyond Parks Canada's Control

At the CLA Annual General Meeting Parks Canada stated that downstream flooding was beyond its control. This assertion is incorrect on its face. Avoiding flooding is only beyond Parks Canada's control, because it maintains a full pool height behind Bobs Lake Dam during spring and summer in anticipation of releasing water to the Rideau Canal in support of tourism. Owing to a full pool height in Bobs Lake, higher than expected precipitation cannot be contained and is released concurrently. Unusually higher than normal precipitation leads to over-topping of Bobs Lake Dam and flooding. Inasmuch as Bobs Lake Dam is unsafe, maintaining a lower pool height in Bobs Lake is imperative.

Environmental Impact Analysis

We understand an Environmental Impact Analysis (EIA), in connection with the New Dam, will be completed soon. We have been led to believe that the EIA will not address design, flood control or Dam Operating Policy, because according to Parks Canada; operating practices will not be changed from those applicable to the current Bobs Lake Dam. If true, the anticipated public consultation on the EIA will not permit examination of these factors, which are critical to our concerns.

Clearly, removing environmental impact and related Operating Policy from consideration in the EIA would be adverse to the federal government's announced intent to impose state of the art practices in favour of climate, clean water and ecology in applicable areas of federal management.

Conclusion

The Association believes safety of residents, protection of property and protection of the environment downstream of Bobs Lake Dam from flooding is paramount. Relevant priorities in order are,

- Safe Dam and water level management requires a generous safety margin between Bobs Lake's pool height and the maximum fill height of Bobs Lake Dam,
- Dam operating strategy should emulate natural downstream flow,
- Dam operating strategy should minimize significant variance of downstream flow and lake levels,
- Supplemental water supply can be provided to the Rideau Canal consistent with safety and observance of the above points.

We trust that this will be dealt with on an urgent basis as the Association wishes to explore these matters as soon as possible with Parks Canada in order to better understand its operations and explore collateral questions.

Thank you for your consideration.

Sincerely,

“SIGNED”

Bruce G. McIntyre, P.Geo.
Chairman, CLA Water Level Committee,
Christie Lake Association Inc.

Cc: Scott Reid, Member of Parliament
Randy Hillier, Member of Provincial Parliament, Ontario
Larry Donaldson, Chief Administrative Officer, Tay Valley Township
John de Rosenroll, Chief Administrative Officer, Town of Perth