



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUN 25 2018

REPLY TO THE ATTENTION OF:

Kimberly D. Bose, Secretary  
U.S. Federal Energy Regulatory Commission  
888 First Street, Northeast  
Washington, District of Columbia 20426

Re: Request for Comments on the Pre-Application Document and Scoping Document, Brainerd Hydroelectric Relicensing Project, Mississippi River, City of Brainerd, Crow Wing County, Minnesota, Docket Number P-2533

Dear Ms. Bose:

EPA has received your request for comments on the Pre-Application Document (PAD) and Scoping Document for the project referenced above. The Federal Energy Regulatory Commission (FERC) is the lead agency under the National Environmental Policy Act (NEPA), and Brainerd Public Utilities is the project proponent. EPA provided input to inform development of the PAD through an August 30, 2017 comment letter. We offer comments in this letter to inform development of the Environmental Assessment (EA).

The proposed action is FERC relicensing the Brainerd Hydroelectric Project. FERC issued the current license in 1993, and it expires in 2023. The existing project consists of five turbine generators. A sixth generating unit was previously authorized but has not yet been installed. Beyond installation of the sixth generating unit, Brainerd Public Utilities does not propose any changes to infrastructure or operations. The project would continue to operate in a run-of-the-river mode.

#### **Adaptation**

The Scoping Document explains that FERC may issue licenses for terms ranging from 30 to 50 years for non-federal hydroelectric projects. We recommend considering the current condition and likely integrity of the project's physical infrastructure over the life of the new license. The National Climate Assessment<sup>1</sup> finds that in the Midwest, extreme heat, heavy downpours, and flooding will affect infrastructure. Consider resiliency and adaptation measures or plans to ensure that the infrastructure will maintain its structural integrity and safe operating conditions under changing heat and precipitation conditions.

#### **Aquatic Species**

The PAD explains that project operations cause impingement, entrainment, and turbine induced fish mortality. We recommend that the EA describe the context and intensity of impacts to fish

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<sup>1</sup> The U.S. Global Change Research Program's National Climate Assessment is available at: <https://www.globalchange.gov/browse/reports>

species, and consider whether measures are available and warranted to minimize impacts. Consider best practices, such as optimizing spacing between bars in trash racks. Coordinate with the Minnesota Department of Natural Resources on best practices to protect aquatic species, and document coordination in the EA.

### **Water Quality**

The PAD explains that the Mississippi River is impaired in the project area. This reach of the River was listed as impaired for mercury in fish tissue in 1998, and a Total Maximum Daily Load (TMDL) Plan for mercury was approved in 2007. The River was also listed as impaired for total suspended solids in 2016, and a TMDL is targeted for completion in 2021. In the EA, we recommend describing existing water quality conditions and ensuring that the proposed project would not further impair water quality or delay remediation of current impairments.

### **Project Boundary**

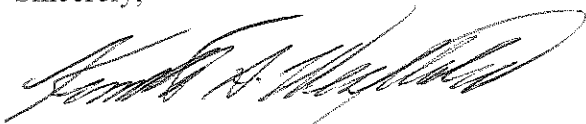
The PAD includes a project map with an outline of the project boundary. The project boundary covers the Brainard Dam and the area upriver. The area downriver does not appear to be included. We recommend extending the project boundary south for purposes of considering potential impacts to water quality, aquatic species, and other downstream resources.

### **Environmental Data**

To access environmental information that may be useful for the EA, we recommend using EPA's NEPAassist web-based analytical tool, available at: <https://www.epa.gov/nepa/nepassist>. NEPAassist allows users to access geospatial environmental data for user-defined locations.

We appreciate the opportunity to provide input. If you would like to discuss our comments, please contact Jennifer Tyler of my staff at 312-886-6394 or [tyler.jennifer@epa.gov](mailto:tyler.jennifer@epa.gov). Please provide future NEPA documents for this project to the mailing address above and electronically to Ms. Tyler.

Sincerely,



Kenneth A. Westlake, Chief  
NEPA Implementation Section  
Office of Enforcement and Compliance Assurance