



BRAINERD PUBLIC UTILITIES

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www.bpu.org

July 21, 2021

VIA E-FILING

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

**Re: Brainerd Hydroelectric Project, FERC Project No. 2533
Final License Application (Public)**

Dear Secretary Bose:

Brainerd Public Utilities (BPU) herein electronically files with the Federal Energy Regulatory Commission (FERC) this public version of the revised Final License Application (FLA) for the relicensing of the Brainerd Hydroelectric Project (Project), FERC Project No. 2533 (Project) pursuant to 18 CFR §5.17(a). The Project is currently operating under a license that was issued by the FERC on February 28, 1993 and is set to expire on February 28, 2023. Revisions to the FLA are in response to a letter from the FERC, dated April 22, 2021.

Concurrent with this filing, a copy of this letter is also being provided (via email) to all parties listed on the attached distribution list. All interested parties can access and download publicly-available documents generated during the ILP including this revised FLA from BPU's public website: <http://bpu.org/our-services/electric/hydro/> or the FERC website: <https://www.ferc.gov/docs-filing/elibrary.asp> under docket number P-2533.

BPU looks forward to working with FERC and other interested parties on the Project relicensing. If you have questions regarding the PSP, you may contact Ms. Adèle Braun at 952-842-3703 or by email at abraun@barr.com or me at 218-825-3213 or by email at smagnuson@bpu.org.

Sincerely,

Scott Magnuson
Brainerd Public Utilities, Superintendent

Attachments:

FLA Revisions

Final License Application (Revised)

The mission of Brainerd Public Utilities is to provide safe, reliable, environmentally friendly electric, water and sewer services to our customers at the lowest reasonable cost.

Attachment 1: FLA Revisions

Final License Application (FLA) Revisions

Comments received by the Federal Energy Regulatory Commission (FERC) in a letter, dated April 22, 2021 are reiterated below followed by the requested information and/or the location of the requested information in the Final License Application (Revised).

1. **Exhibit A:** Section 5.18(a)(5)(i) of the Commission's regulations, which references section 4.61, requires, in part, that an application include an Exhibit A that contains a description of the project, including the physical composition, dimensions, and general configuration of any dams, spillways, penstocks, powerhouses, tailraces or other structures whether existing or proposed to be included as part of the project. The final license application (FLA) does not contain certain dimensions (i.e., height, width, length, etc.) of the following project structures: a) dimensions of the left embankment; b) the height of the powerhouse; c) width and height of slide gate; d) dimensions of the spillway section; e) dimensions of ogee & spillway sections; f) overall width of gate section; g) height of right embankment; and h) dimensions of the tailrace section. Please revise Exhibit A accordingly to include the referenced dimensions as required by section 4.61(c)(1)(viii).

Response: Section A.4.3, including subsections within A.4.3 have been updated to address the comment. Section E.6.2, including subsections within E.6.2 have been updated for consistency in the license. The left embankment was changed to left abutment to align with other project data for consistency.

2. **Exhibit A:** Section 5.18(a)(5)(i) of the Commission's regulations, which references section 4.61[see section 4.61(c)(8)], requires, in part, that an application includes an Exhibit A that contains a detailed single-line electrical diagram for the project. The single-line diagram submitted with the FLA does not contain sufficient information/detail (e.g., main components such as transformers, switches, and breakers as indicated by their standard graphic symbol) to allow for an understanding and evaluation of the project's electrical distribution infrastructure. Please provide a revised electrical single-line diagram, accordingly.

Response: The single-line diagram has been updated and is include in Appendix B: Exhibit A – Project Documentation Attachments (CEII).

3. **Exhibit F:** Section 5.18(a)(5)(i) of the Commission's regulations, which references section 4.61 [see section 4.61(e), section 4.41(g), and then section 4.39(a)], requires each map and drawing be drawn and lettered to be legible when it is reduced to a print that is 11 inches on its shorter side. The following Exhibit F drawings are either pixelated, illegible/barely legible, and difficult to read: a) Plan and Sections of Brainerd Dam; b) Project and Site Plan; c) Plan and Sections of Generator Room and West End; d) Stop Log Gates; e) Stop Log Piers and Sections Thru Spillway Repair and Reconditioning; f) Dam Gate Air Injection System; g) Detail – Pier No. 1 Repair and Reconditioning; h) Detail – Pier No. 2 Repair and Reconditioning; i) Detail – Pier No. 3 Repair and Reconditioning; and j) West Gate, Dam Repair, Cofferdam Installation. Please provide Exhibit F drawings that clearly and legible show all text, especially numerals, and linework. Drawings must be consistently and consecutively labelled as required by section 4.39(d) of the Commission's regulations.

Response: Exhibit F drawings have been recreated from available printed drawings to show plans, elevations, profiles, and sections for the major project structures. Exhibit F drawings are included in Appendix E: Exhibit F – Project Drawings (CEII).

4. **Exhibit G:** Section 5.18(a)(5)(i) of the Commission's regulations, which references section 4.61 [see section 4.41(h) and section 4.39(a)] requires, in part, that an application includes an Exhibit G with a map or series of maps that complies with section 4.41(h) and sufficiently, clearly and legibly, show the location of the project, relative locations and physical interrelationships of the principal project features, and a proposed project boundary that encloses all of the principal project features identified in Exhibit A of the final license application. The Exhibit G drawings for the Brainerd Hydroelectric Project do not comply with section 4.61(h) because they do not identify/label or show the relative locations and the physical interrelationships of the principal project features identified in Exhibit A to be within the proposed project boundary.

Please provide a revised exhibit G that complies with section 4.61(h) of the Commission's regulations. If more than one sheet is used, the sheet must be numbered consecutively; each sheet must depict a small insert sketch showing the entire project and indicate the portion depicted on the sheet; and each sheet must contain a minimum of three known reference points. The latitude and longitude coordinates or state plane coordinates of each reference point must be shown. In addition, each Exhibit G drawing must be stamped by a registered land surveyor in accordance with section 4.39(a) of the Commission's regulations.

Response: Exhibit G drawing have been updated to comply with section 4.61(h) and 4.39(a). Exhibit G drawings are included in Appendix F: Exhibit G – Project Maps (Public)

5. **Exhibit A:** Section A.4.5, *Estimated Capital Costs and Estimated Annual Operation and Maintenance Costs of Proposed Environmental Measures*, provides a table of estimated costs for proposed environmental measures (Table A-8). However, it is unclear how the costs provided are associated with the environmental measures proposed in section E.7.2, *Applicant's Proposal*. In section E.7.2 *Brainerd Public Utilities (Brainerd)* proposes to develop a *Recreation Management Plan*, maintain a project recreation site, and develop a *Cultural Resources Management Plan*. However, Table A-8 does not provide a capital cost for developing either plan, nor is it clear what the reports identified in Table A-8 would entail to justify the annual costs provided. Further, Table A-8 provides an annual operations and maintenance cost of "proposed measure" but the proposed measure itself is not specified. Therefore, please revise Table A-8 to provide a separate capital and annual operation and maintenance cost for each proposed environmental measure listed in section E.7.2, including any associated costs (i.e., annual reports), and provide a justification for the annual operation and maintenance cost.

Response: Table A-8 has been updated to address the information request. Text has been added below Table A-8 to further explain what has been included in each value.

6. **Exhibit E Aquatic Resources:** Section E.7.1, *Summary of Existing Measures*, states that Article 402 of the current license requires Brainerd to operate the project in a run-of-river mode, maintain a target surface elevation of 1174.04 feet National Geodetic Vertical Datum, with fluctuations limited to 0.10 feet, and that Article 403 of the current license requires Brainerd to file and implement a plan to monitor the project's run-of-river operation. However, details on how run-of-river operation

is maintained and monitored at the project were not provided in the final license application (FLA). Therefore, please provide the following information:

- a. a description of the monitoring frequency for documenting reservoir impoundment elevations; and
- b. a description of all water level sensors, staff gages, and any other gages or measuring devices, or techniques that are used to monitor compliance with
- c. run-of-river operation, including maintaining the target reservoir surface elevation (± 0.5 foot).

Response: Additional sections (Section E.6.6.2 and E.6.6.3) have been included in response to the information request.

7. **Exhibit E Aquatic Resources:** Section E.7.1, Summary of Existing Measures, states that Article 404 of the current license requires Brainerd to file and implement an operation plan which specifies how it coordinates with other plant operators on the Mississippi River and considers effects of flow adjustments on downstream fishery and other natural resources. Please describe how Brainerd currently complies with Article 404, including any coordination with other plant operators and any flow adjustments. Additionally, please clarify if Brainerd is proposing to continue complying with Article 404. If so, please provide the capital cost and annual operation and maintenance cost associated with this measure.

Response: An additional section (Section E.6.6.1) has been included in response to the information request.

8. **Exhibit E Aquatic Resources:** During the pre-filing process, it was noted that zebra mussels are present at the project. However, the FLA does not include a discussion of zebra mussels. Therefore, please describe the known abundance of zebra mussels at the project, including any monitoring and/or control measures that are currently being implemented. Additionally, please clarify if Brainerd is proposing to continue to implement these measures or add any new measures related to monitoring and/or control of zebra mussels, along with the associated capital cost and annual operation and maintenance costs.

Response: A paragraph has been added to the end of E.8.3.1 in response to the information request.

9. **Exhibit E Terrestrial Resources:** Appendix C of the FLA, Botanical Resources Memo, states that noxious weeds have been documented in the project area, including purple loosestrife, common tansy, and reed canary grass. However, only the location of common tansy is provided. Please provide information regarding the location, approximate abundance, and last observation date for any noxious or invasive plants in the project area.

Response: A paragraph has been added to the end of E.8.4.1 in response to the information request.

10. **Exhibit E Terrestrial Resources:** Section 5.8.7.1.2, State Species Review, states the Blanding's turtle has been identified in the vicinity of the project. However, the FLA does not provide additional information regarding when or where the turtle was last observed, or how the project may affect

Blanding's turtle habitat. Please provide: (1) any records, including observation location and date, of the Blanding's turtle at the project; and (2) a description of any project maintenance actions that occur near or within Blanding's turtle habitat at the project.

Response: A paragraph has been added to the end of E.8.7.1.2 in response to the information request.

11. **Exhibit E Terrestrial Resources:** *Section 5.18(b)(3)(ii) of the Commission's regulations requires a summary of any anticipated environmental effects on federally listed or proposed species in the project vicinity. Maps of the project area indicate the presence of trees that may provide habitat to the northern long-eared bat, but a description of maintenance actions (i.e., situational tree clearing) that may affect this habitat is not provided. Please provide a description of maintenance actions, including the timing, frequency, and magnitude of these actions, that may affect undocumented northern long-eared bats in the project area.*

Response: A paragraph has been added to the end of E.8.7.1.1 in response to the information request.

12. **Exhibit E Cultural Resources:** *Appendix D of Exhibit E of the FLA includes the correspondence record with the Minnesota State Historic Preservation Officer (Michigan SHPO). In a letter filed on March 1, 2021, Brainerd provided updates to the Area of Potential Effect (APE) maps and a discussion regarding the revisions of the APE maps for the Minnesota SHPO. However, the status of the Minnesota SHPO's comment letter on the APE maps and associated discussion is unclear. Please clarify if Brainerd has received a comment letter from the Minnesota SHPO and, if not, please follow up with the Minnesota SHPO to determine the status of the letter. Please continue to provide documentation of all correspondence with the Minnesota SHPO.*

Response: Additional correspondence from the Minnesota SHPO was received on July 16, 2021 and has been included at the end of Appendix D: Exhibit E – Environmental Report Attachments (PRIV).

13. **Exhibit E Cultural Resources:** *To complete the required Cultural Resource Study, on April 10, 2020, Brainerd filed a letter stating it would provide updated map(s) of the APE, and conduct a comprehensive literature review, supplemented by additional field study (if necessary). Brainerd also proposed to make formal determinations of eligibility for each property surveyed, and request Minnesota SHPO's review and comment on all the above listed items. On February 8, 2021, staff issued a letter stating that above information was supposed to be filed by January 8, 2021; however, because the date had passed, the information should be filed with the FLA. While updated APE maps were provided in the FLA, the remaining information was not included in the FLA. Therefore, please provide the literature review, supplemented by additional field study (if necessary), formal determinations of eligibility for each property surveyed, and correspondence of Minnesota SHPO's review and comments on the items. If additional field studies are not required, please include an explanation on the lack thereof of additional Phase I or Phase II cultural surveys and the Minnesota SHPO's comments.*

Response: Coordination with the Minnesota SHPO has continued through relicensing with a another set of updated maps provided to the Minnesota SHPO on February 26, 2021. In their

most recent response letter dated July 16, 2021, the Minnesota SHPO have agreed that the APE as defined and documented in Barr's letter dated February 26, 2021 is generally appropriate to take into account the potential direct and indirect effects. With the concurrence on the APE by the Minnesota SHPO, BPU will proceed into the next step in the coordination process as defined in SHPO's response letter dated July 16, 2021.

14. **Exhibit E Consultation:** *Under section 307(c)(3)(A) of the Coastal Zone Management Act (CZMA), 16 U.S.C. § 1456(3)(A), the Commission cannot issue a license for a project within or affecting a state's coastal zone unless the Coastal Zone Management agency concurs with the license applicant's certification of consistency with the state's CZMA program, or the agency's concurrence is conclusively presumed by its failure to act within 180 days of its receipt of the applicant's certification.*

Although Brainerd states that the project is not located near the coastal zone, staff needs evidence of consultation concerning the project's consistency with the Minnesota Department of Natural Resources' (Minnesota DNR) Lake Superior Coastal Program. To determine the effects of the project on Minnesota's designated coastal zone, please complete the following for the FLA:

- a. consult with the Minnesota DNR's Lake Superior Coastal Program on whether the project would affect the coastal zone and what steps you need to take, if any, to comply with the state's CZMA program;*
- b. if the project would affect the state of Minnesota's designated coastal zone, send coastal zone consistency certification to the Minnesota DNR's Lake Superior Coastal Program, assuming the project would be consistent with the state's coastal zone management program; and*
- c. file copies of the consistency certification with the Commission, indicating when Minnesota DNR's Lake Superior Coastal Program received them.*

Also, please file any correspondence Minnesota DNR's Lake Superior Coastal Program sends in response to your submitted coastal zone consistency certification

Response: Correspondence with the Minnesota Department of Natural Resources' (Minnesota DNR) Lake Superior Coastal Program is documented in Appendix C: Exhibit E-12 – Coastal Zone Management Coordination.

15. **Exhibit F:** *Section 5.18(a)(5)(i) of the Commission's regulations, which references section 4.61 [see section 4.41(g) and section 4.39(a)] requires, in part, that an application includes an Exhibit F consisting of general design drawings of principal project works described in Exhibit A. Review of the Exhibit F "Project Site Plan" drawing, A8807, show that the entire sheet pile retaining wall located along the left abutment, immediately downstream of the Hydro Plant was not included on the drawing. Please revise this drawing, accordingly.*

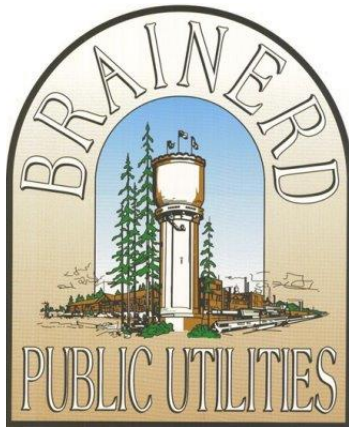
Response: Exhibit F drawings have been updated accordingly.

Attachment 2: Final License Application (Revised)

Final License Application (Revised)

Brainerd Hydroelectric Project ***FERC License No. 2533***

Prepared for:
Brainerd Public Utilities
Brainerd, Minnesota



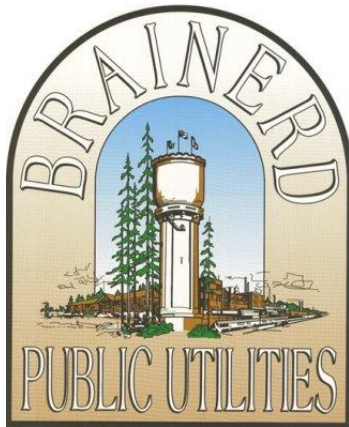
July 21, 2021

Available for Public Release

Final License Application (Revised)

Brainerd Hydroelectric Project ***FERC License No. 2533***

Prepared for:
Brainerd Public Utilities
Brainerd, Minnesota



July 21, 2021

Available for Public Release

Final License Application (Revised) Brainerd Hydroelectric Project July 21, 2021

Preface

Brainerd Public Utilities (BPU) is filing this revised Final License Application (FLA) to renew its license to generate hydroelectric power in response to a letter from the Federal Energy Regulatory Commission (FERC), dated April 22, 2021, noting deficiencies in the FLA and requesting additional information.

BPU has followed the FERC's Integrated Licensing Process (ILP) during the relicensing process, as noted in the Notice of Intent (NOI) they filed on February 28, 2018. The ILP was established in regulations issued by the FERC on July 23, 2003 (Final Rule, Order No. 2002) and is found in Title 18 of the U.S. Code of Federal Regulations (18 CFR), Part 5. As noted in these regulations, the ILP is the FERC's default process for relicensing.

This FLA follows the requirements of 18 CFR § 5.16(a), with minor changes in format to improve readability and formatted to be consistent with 18 CFR § 5.18, which requires general instructions, an initial statement, and Exhibits A, F, and G (for major water projects 5 megawatts [MW] or less), in accordance with 18 CFR § 5.18(a)(5)(i). Exhibit E and Exhibit H are also required in accordance with 18 CFR § 5.18(b) and 18 CFR § 5.18(c), respectively.

Final License Application (Revised)
Brainerd Hydroelectric Project
July 21, 2021

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Abbreviations and Acronyms

BPU	Brainerd Public Utilities (Licensee)
BPUC	Brainerd Public Utilities Commission
CEII	Critical Energy Infrastructure Information
CFR	Code of Federal Regulations
cfs	Cubic Feet per Second
CIP	Conservation Incentive Program
CSIR	Consultant's Safety Inspection Report
CUI	Controlled Unclassified Information
DLA	Draft License Application
DSSMP	Dam Safety Surveillance and Monitoring Plan
DSSMR	Dam Safety Surveillance and Monitoring Report
EA	Environmental Analysis
EAP	Emergency Action Plan
EFH	Essential Fish Habitat
ESA	Endangered Species Act
FERC	Federal Energy Regulatory Commission
FLA	Final License Application
FPA	Federal Power Act
hp	horsepower
ILP	Integrated Licensing Process
IPaC	Information, Planning, and Conservation System
ISR	Initial Study Report
kW	kilowatt(s)
MBS	Minnesota Biological Survey
MDL	Minnesota Drifts and Lake Plains
MNDNR	Minnesota Department of Natural Resources
MPCA	Minnesota Pollution Control Agency
MRBW	Mississippi River – Brainerd Watershed
NAD83	North American Datum 1983
NGO	Nongovernmental Organization
NEPA	National Environmental Policy Act
NGVD	National Geodetic Vertical Datum 1929
NHIS	Natural Heritage Inventory System
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service

NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
ODSP	Owner's Dam Safety Program
PAD	Pre-Application Document
PFMA	Potential Failure Mode Analysis
PM&E	Protection, Mitigation, and Enhancement
Project	Brainerd Hydroelectric Project
PSP	Proposed Study Plan
PURPA	Public Utility Regulatory Policies Act of 1978
RSP	Revised Study Plan
RTE	Rare, Threatened, Endangered, and Special Status
SD1	Scoping Document 1
SD2	Scoping Document 2
SHPO	State Historical Preservation Office
STID	Supporting Technical Information Document
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
USR	Updated Study Report
WMA	State Wildlife Management Areas
WPA	Waterfowl Production Areas

Definitions

Authorized installed capacity	The licensed turbine capacity at the Brainerd Hydroelectric Project (Project) is 3,542.5 kilowatts (kW)
Installed capacity	The installed turbine capacity at the Project is currently 2,942.5 kW
Licensee	The license was issued to the city of Brainerd and its Brainerd Public Utilities Commission (BPUC). Brainerd Public Utilities (BPU) manages the Project.
Project	Brainerd Hydroelectric Project, Federal Energy Regulatory Commission (FERC) No. 2533 (Project)
Project Area	The area within the Project Boundary consisting of "...lands necessary for the operation and maintenance of the Project and for other Project purposes..."
Project Boundary	The boundary line defined in the Project license issued by the FERC that surrounds the "...lands necessary for the operation and maintenance of the Project and for other Project

purposes..." [1]

Relicensing	The process of acquiring a new FERC license for an existing hydropower project under expiration of the existing FERC license
Resource Affected Area	The geographic area in which a specific resource is potentially affected by the Project
Rare, Threatened, Endangered, and Special-Status Species	Rare, threatened, endangered, and special-status species, which for purposes of this Pre-Application Document (PAD) includes all species (plant and animal) listed, proposed for listing, or candidates for listing under the Federal and State Endangered Species Act and those listed by the U.S. Fish and Wildlife Service as sensitive, special status, or watch list
Study Plan Determination	A ruling from FERC that determines the studies conducted during relicensing

**BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**DRAFT APPLICATION FOR LICENSE
FOR A MAJOR WATER POWER PROJECT – 5 MEGAWATTS OR LESS
EXISTING DAM**

**BRainerd HYDROELECTRIC PROJECT
FERC PROJECT No. 2533**

Initial Statement

(Pursuant to 18 CFR §4.61)

1. Brainerd Public Utilities Commission (BPU) (hereinafter "BPU" or "Applicant" or "Licensee") applies to the Federal Energy Regulatory Commission (FERC) for a new license for the Brainerd Hydroelectric Project (FERC No. 2533) (Project), as described hereinafter.

2. The location of the project is:

State or territory: Minnesota

County: Crow Wing County

Township or nearby town: City of Brainerd and the townships of Center, Irondale, Oak Lawn, and West Crow Wing.

Stream or other body of water: Mississippi River

3. The exact name, address, and telephone number of the Applicant are:

Brainerd Public Utilities Commission

8027 Highland Scenic Road

PO Box 373

Brainerd, MN 56401

(218) 825-3213

4. The exact name, address, and telephone number of each person authorized to act as agent for the applicant in this application are:

Mr. Scott Magnuson

Brainerd Public Utilities, Superintendent

8027 Highland Scenic Road

PO Box 373

Brainerd, MN 56401

(218) 825-3213

smagnuson@bpu.org

-
5. The applicant is a municipality and is not claiming preference under section 7(a) of the Federal Power Act.
6. (i) The statutory or regulatory requirements of the state in which the project is located that affect the project as proposed, with respect to bed and banks and to the appropriation, division, and use of water for power purposes, and with respect to the right to engage in the business of developing, transmitting, and distributing power and any other business necessary to accomplish the purposes of the license under the Federal Power Act, are:
- a. Minnesota Statutes, sections:
 - 103A.203 states that the Minnesota Legislature found the public health, safety, and welfare of the state are promoted by the use of state waters to produce hydroelectric power.
 - 103F.125 indicates that proper consideration should be given to the needs of an industry whose business requires that it be located within a floodplain.
 - 103G.127 delegates authority to the Commissioner of Natural Resources, with the concurrence of Board of Water and Soil Resources and the Commissioner of Agriculture to establish a program for regulating the discharge of material into waters of the state as necessary to obtain approval from the United States Environmental Protection Agency to administer the permit program under Section 404 of the Clean Water Act.
 - 103G.245 requires a state-issued permit to make changes in a reservoir, dam, waterway, or on a public water in any manner or diminish the course, current, or cross-section of public waters.
 - b. Minnesota Administrative Rules, parts:
 - 6115.0190 requires permit authority to place fill into public waters.
 - 6115.0200 requires permit authority to excavate and remove materials in public waters.
 - 6115.0210 requires permit authority for construction of structures in public waters.
- (ii) The steps which the applicant has taken or plans to take to comply with each of the laws cited above and 33 USC §1341 (Section 401) of the Federal Clean Water Act are:
- a. Pursuant to 18 CFR §5.18(b)(3)(i), applicants must file a request for a water quality certification, pursuant to Section 401 of the Federal Water Pollution Control Act, 33 S.C. S1341. The Project was issued a water quality certification during relicensing in 1993. When BPU applied for a non-capacity amendment in 2016, Minnesota Pollution Control

Agency (MPCA) noted in a letter to BPU dated March 18, 2016, that the MPCA believed at that time that the original Section 401 Certification for the Project remained in effect because there were no significant structural changes, no change to the dam or reservoir, and no changes to the existing operation of the project. The applicant has been coordinating with the MPCA and is the applicant for the Water Quality Certificate pursuant to Section 401 of the Federal Clean Water Act and Minnesota Statutes, Section 103G.245.

- b. There are no changes planned at the Project and, therefore, no changes that would diminish the course, current, or cross-section of public waters.
- c. There are no current construction projects planned at the Project requiring permits under Minnesota Regulations.

7. Brief project description:

The Project is an existing dam with an installed generating capacity of 2.94 megawatts (MW) operated as a run-of-river on the Mississippi River. The Project is located on land owned by the Licensee.

- i. The installed generating capacity is 2.94 MW.
- ii. The Project is an existing dam.

- 8. Brainerd Public Utilities owns and operates the Project and there are no federal facilities or lands associated with the Project.
- 9. No construction is proposed.

Additional Information

(Pursuant to 18 CFR §5.18(a) and §4.32)

1. *Identify every person, citizen, associations of citizens, domestic corporation, municipality, or state that has or intends to obtain and will maintain any proprietary rights necessary to construct, operate, or maintain the project:*

The Applicant presently holds and will continue to hold the proprietary rights necessary to operate and maintain the Project.

2. *Identify (providing names and addresses):*

- i. *Every county in which any part of the project, and any Federal facility that would be used by the project would be located:*

Crow Wing County Government
326 Laurel St., Suite 13
Brainerd, MN 56401

There are no Federal lands or facilities associated with the Project.

- ii. *Every city, town, or similar local political subdivision:*

- A. *In which any part of the project, and any Federal facilities that would be used by the project, would be located; or*

City of Brainerd
501 Laurel Street
Brainerd, MN 56401

Township of Center, Chairwoman
22894 Antler Road
Merrifield, MN 56465

Township of Irondale
19121 County Road 12
Ironton, MN 56455

Township of Oak Lawn, Supervisor
P.O. Box 333
Brainerd, MN 56401

Township of West Crow Wing, Chairman
6930 Cuyuna Avenue
Brainerd, MN 56401

- B. That has a population of 5,000 or more people and is located within 15 miles of the project dam;*

City of Brainerd
501 Laurel Street
Brainerd, MN 56401

City of Baxter
13190 Memorywood Drive
Baxter, MN 56425

- iii. Every irrigation district, drainage district, or similar special purpose political subdivision*

- A. In which any part of the project, and any Federal facilities that would be used by the project would be located:*

There are no irrigation districts, drainage districts, or similar special purpose political subdivisions.

- B. That owns, operates, maintains, or uses any project facilities or any Federal facilities that would be used by the project:*

There are no irrigation districts, drainage districts, or similar special purpose political subdivisions. There are no Federal lands or facilities associated with the Project.

- iv. Every other political subdivision in the general area of the project that there is a reason to believe would likely be interested in, or affected by, the application:*

There are no other political subdivisions in the general area of the Project known to the Applicant that would be interested in, or affected by, the application.

- v. All Native American tribes that may be affected by the project:*

There are no Native American lands within the Project Boundary or immediate Project vicinity. BPU and the Commission consulted with the following Native American Tribes that may be affected by the Project throughout the relicensing process specifically in support of cultural resource studies.

Bois Forte Band of Chippewa

Bill Latady, Tribal Historic Preservation
Officer 5344 Lakeshore Drive
PO Box 16
Nett Lake MN 59772
blatady@boisforte-nsn.gov

Minnesota Chippewa Tribe

Michael Northbird, GAP Coordinator
P.O. Box 217
Cass Lake MN 56633
mnorthbird@mnchippewatribe.org

Cheyenne & Arapaho Tribes

Virginia Richey, THPO PO Box 167
Concho OK 73022
vrichey@c-a-tribes.org

Fond du Lac Reservation Business Committee

Kevin R. Dupuis, Chairman 1720
Big Lake Road Cloquet MN 55720
kevindupuis@fdlrez.com

Grand Portage Reservation Tribal Council

Norman Deschampe, Chairman
P.O. Box 428
Grand Portage MN 55605
maryanng@grandportage.com

Leech Lake Historic Preservation Office

Amy Burnette, Tribal Historic Preservation Officer
190 Sailstar Drive NE
Cass Lake MN 56633 amy.burnette@llojibwe.org

Lower Sioux Indian Community of Minnesota

Cheyenne St. John,
Tribal Historic Preservation Officer / Historic Site
Mgr.
39527 Reservation Highway 1
Morton MN 56270
lowersiouxthpo@lowersioux.com

Mille Lacs Band of Ojibwe Indians

Natalie Weyaus, Tribal Historic
Preservation Officer
43408 Oodena Drive
Onamia MN 56359
natalie.weyaus@millelacsband.com

Santee Sioux Tribal Nation

Ryan Kills-a-Hundred
425 Frazier Ave. N. Ste 2
Niobrara NE 68760-7219
ryan.killsahundred@fsst.org

Otoe-Missouria Tribal Council John

R. Shotton, Chairman
8151 Highway 177
Red Rock OK 74651-0348
jshotton@omtribe.org

Ote-Missouria Tribe of Oklahoma

Elsie Whitehorn
THPO 8151 Highway 177
Red Rock OK 74651-0348
ewhitehorn@omtribe.org

Prairie Island Indian Community of

Minnesota Noah White, Tribal
Historic Preservation Officer 5636
Sturgeon Lake Road
Welch MN 55089 Noah.white@piic.org

Red Lake Band of Chippewa**Indians of Minnesota**

Kade Farris
PO Box 274
Red Lake MN 56671
kade.ferris@redlakenation.org

**Red Lake Nation Government
Center**

Darrell G. Seki, Sr., Chairman
15484 Migizi Drive
Red Lake MN 56671
No email address available

Santee Sioux Tribal Council

Roger Trudell, Chairman 425 Frazier
Ave. N.Ste 2
Niobrara NE 68760-7219
rtrudell@santeedakota.org

**Shakopee Mdewakanton Sioux
Community of Minnesota**

Bill Rudnicki,
Tribal Administrator
2330 Sioux Trail NW
Prior Lake MN 55372
bill.rudnicki@shakopeedakota.org

**Shakopee Mdewakanton Sioux Community
of Minnesota**

Leonard Wabasha
Director Cultural Resources
2300 Tiwahe Circle
Shakopee, MN 55379
culturalresources@shakopeedakota.org

White Earth Nation

Terrence Tibbetts, Chairman
P.O. Box 418
White Earth MN 56591
monica.hedstrom@whiteearth-nsn.gov

**Upper Sioux Community of
Minnesota**

Samanatha Odegard, THPO
Kevin Jensvold
P.O. Box 147
Granite Falls MN 56241-0147
SamanthaO@uppersiouxcommunity-nsn.gov

**White Earth Nation of Minnesota
Chippewa**

Jamie Arsenault, THPO
P.O Box 418
White Earth MN 56591
jamie.arsenault@whiteearth.com

3. The Applicant has, in accordance with 18 CFR §4.32(a)(3), made a good-faith effort to notify, by certified mail, the following entities of the filing of this application. This notification contained the name, business address, and telephone number of the applicant. This notification contained a link to license application, which included Exhibit G, and means to request a printed copy of the application.
- A. Every property owner of record of any interest within the bounds of the Project;
 - B. The entities listed in #2 above;
 - C. Other governmental agencies that would likely be interested in or affected by the application.

Verification Statement

VERIFICATION

This Application for License for the Brainerd Hydroelectric Project, FERC No. 2533, is executed in the State of Minnesota, County of Crow Wing by Tad Johnson, President of the Brainerd Public Utilities Commission, 8027 Highland Scenic Road, PO Box 373, Brainerd, Minnesota, 54601, who, being duly sworn, deposes and says that the contents of this application are true to the best of his/her knowledge or belief. The undersigned Applicant has signed the application this 21 day of July, 2021.

BRAINERD PUBLIC UTILITIES COMMISSION

BY: Tad Johnson

Tad Johnson

President

Brainerd Public Utilities Commission

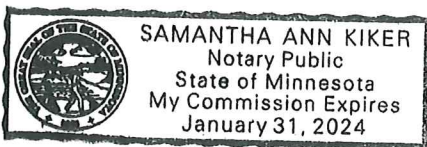
NOTARY

Subscribed and sworn to before me, a Notary Public of the State of Minnesota this 21 day of July, 2021.

Samantha Kiker

(notary public)

My Commission Expires: 1/31/24 /seal



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**DRAFT APPLICATION FOR LICENSE
FOR A MAJOR WATER POWER PROJECT – 5 MEGAWATTS OR LESS
EXISTING DAM**

**BRainerd HYDROELECTRIC PROJECT
FERC PROJECT No. 2533**

Exhibit A Project Description

(Pursuant to 18 CFR §4.61)

A.1 Applicability

Exhibit A is required for this application. 18 CFR §5.18(a)(5)(i) identifies the contents of the application license for a major water project 5 MW or less, and indicates it should include the general instructions, an initial statement, and Exhibits A, F, and G in accordance with 18 CFR §4.61. Exhibits E and H are also required in accordance with 18 CFR §5.18(b) and 18 CFR §5.18(h), respectively.

A.2 Introduction

Brainerd Public Utilities Commission (BPU) owns and operates the Brainerd Hydroelectric Project (Project), Federal Energy Regulatory Commission (FERC) Project No. 2533. The Project is in Crow Wing County, Minnesota, on the Mississippi River, in the City of Brainerd, as shown in Figure A-1. The Project is located approximately 130 miles north of the Minneapolis – St. Paul metropolitan area.

A.3 License History

BPU is filing this Draft License Application (DLA) with the FERC for the Project relicensing. BPU's existing FERC license expires February 28, 2023. BPU has followed the FERC's Integrated Licensing Process (ILP) during the relicensing process. The ILP was established in regulations issued by the FERC on July 23, 2003 (Final Rule, Order No. 2002) and is found in Title 18 of the U.S. Code of Federal Regulations (18 CFR), Part 5.

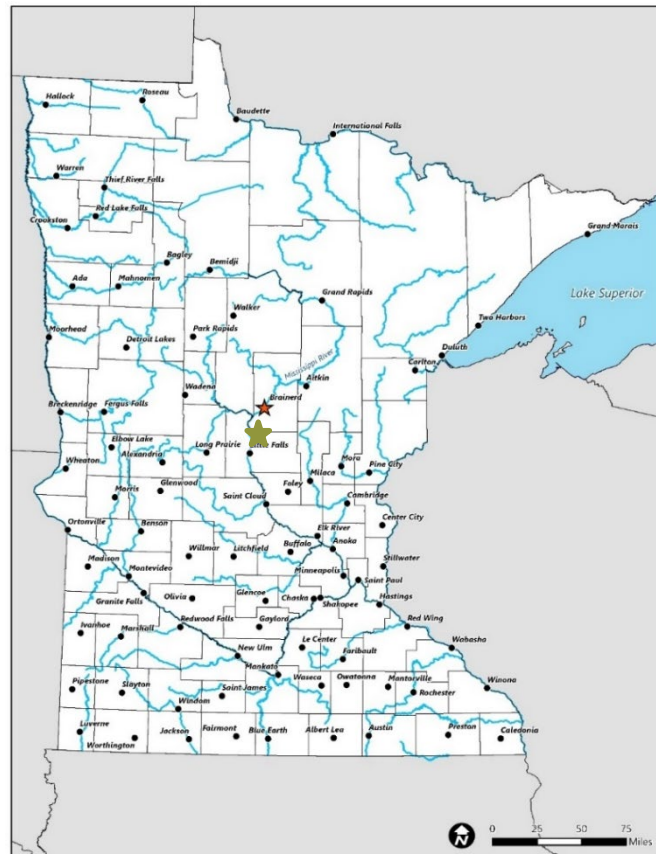


Figure A-1 Project Location

The original dam was authorized by an Act of Congress in 1886 [2]. The dam was damaged by a flood in the spring of 1950 and the U.S. Army Corps of Engineers (USACE) approved reconstruction on May 18, 1951 [3]. The FERC issued a license to the Northwest Paper Division of Potlatch Corporation on December 10, 1976, and the Project was relicensed for 30 years to Potlatch Corporation on March 2, 1993. License transfers to various entities were approved by FERC on the dates shown below [4]:

- Missota Paper Company, LLC on April 8, 2003
- Wausau Paper of Minnesota, LLC on October 21, 2004
- Wausau Paper Printing and Writing, LLC on December 28, 2006
- Wausau Paper Mills, LLC on March 10, 2010
- City of Brainerd and its Public Utilities Commission on March 13, 2014

Transfer of the license officially occurred when BPU purchased the Project on June 13, 2014. At the time of the purchase, the Project boundaries were changed, removing the paper mill adjacent to the Project from within the Project boundaries.

On August 4, 2016, a non-capacity license amendment application was submitted to the FERC. The amendment proposed a permanent addition of a 600-kilowatt (kW) turbine. On July 19, 2016, the FERC approved the amendment and changed the Project's licensed installed capacity to 3,542.5 kW; however, the current installed capacity remains at 2,942.5 kW until the new turbine is installed.

A.3.1 Project Boundaries

A digital Project Boundary map, which include the location of the dam is included in Exhibit A-1 of Appendix A. A more detailed discussion of the Project Boundary is discussed in Exhibit G.

A.3.2 Datum

Elevations herein are referenced to National Geodetic Vertical Datum 1929 (NGVD), in feet. Project features have historically been referenced to Memphis datum and/or NGVD. Memphis datum is 8.16 feet higher than NGVD (NGVD = Memphis minus 8.16 feet). For reference, the top of the closed bascule gates in the vertical position is at elevation 1183.00 Memphis datum, or 1174.84 NGVD. GIS maps provided in the appendices of this report have been developed using North American Datum of 1983 (NAD83) Zone 15N coordinate system. All references to left and right assume an orientation looking downstream.

A.4 Description of Project and Proposed Mode of Operation – 18 CFR §4.61 (c)(1)

Pursuant to the Commission's regulations at 18 CFR §4.61(c)(1), the Sections A.4.1 and A.4.2 describe the Project and mode of operation.

A.4.1 Generating Units – 18 CFR §4.61 (c)(1)(i) and (ii)

The Project is licensed for six generating units with a total installed capacity of 3,542.5 kilowatts [5]. A summary of the generating unit information is provided in Table A-1, with detailed information on each unit in Table A-2. At present, five tandem horizontal turbines with direct connections to generators are

installed. The license was amended in 2016 to allow for the additional capacity of a sixth turbine/generator unit, which has not been installed yet. With the proposed turbine, the Project will have a combined rated capacity of 3,542.5 kW. The installed capacity is currently 2,942.5 kW.

Units 1, 2, and 3 have governors and synchronous generators. Units 4 and 5 have synchronous motors but no governors. Wicket gates for units 4 and 5 are manually controlled. Turbines 3, 4, and 5 were originally used for direct grinding of pulp and were converted to hydroelectric operation in 1956 [3].

Table A-1 Generating Unit Summary

Turbines and Generators		CFR Reference
Number of Authorized Units	6	18 CFR §4.61(c)(1)(i)
Number of Installed Unites	5	18 CFR §4.61(c)(1)(i)
Rated Capacity	Varies (see Table A-2)	18 CFR §4.61(c)(1)(i)
Provisions for Future Units	License was amended in 2016 to allow for a sixth turbine/generator unit, which has not been installed yet.	18 CFR §4.61(c)(1)(i)
Type of Hydraulic Turbines	Varies (see Table A-2)	18 CFR §4.61(c)(1)(ii)

Table A-2 Unit Summary

Unit No.	Year Generator / Turbine Installed	Authorized Installed Capacity (kW)	Generator Make and Type	Turbine Make and Type
1	1916	560 ⁽¹⁾	Electric Machinery 700 kVA 2300V (560 kW)	2-S. Morgan Smith 45 inch Horizontal Frances 128.5 rpm Type N 610 hp (455 kW) at 665 cfs
2	1916	560 ⁽¹⁾	Electric Machinery 700 kVA 2400V (560 kW)	2-S. Morgan Smith 45 inch Horizontal Frances 128.5 rpm Type N 610 hp (455 kW) at 665 cfs
3	1956/1916	480.3 ⁽¹⁾	General Electric 600 kVA 2300V (480.3 kW)	2-S. Morgan Smith 32.5 inch Horizontal Frances 225 rpm Type S 520 hp (388 kW) at 493 cfs
4	1956/1916	671.1 ⁽¹⁾	Electric Machinery 900 hp 2200V (671.1 kW)	2-S. Morgan Smith 32.5 inch Horizontal Frances 225 rpm Type S 520 hp (388 kW) at 493 cfs
5	1956/1916	671.1 ⁽¹⁾	Electric Machinery 900 hp, 2200V (671.1 kW)	2-S. Morgan Smith 32.5 inch Horizontal Frances 225 rpm Type S 520 hp (388 kW) at 493 cfs
6	Planned 2021/2022	600 ⁽²⁾ (assumed)	(to be determined (TBD))	TBD
Total	-	2,942.5	-	-

(1) Based on BPU calculated capacity (6)

(2) ATS-63 Turbine/generator installation date TBD – (6)

A.4.2 Operations - 18 CFR §4.61 (c)(1)(iii) through 18 CFR §4.61 (c)(1)(vii)

A summary of operations data is provided in Table A-3 and supporting information included in Sections A.4.2.1 through A.4.2.6.

Table A-3 Operation Summary

Operation		CFR Reference
Plant Operations	Manual	18 CFR §4.61(c)(1)(iii)
Peaking	Not Used	18 CFR §4.61(c)(1)(iii)
Average Annual Generation	19,500,000 kWh	18 CFR §4.61(c)(1)(iv)
Average Head	20-feet	18 CFR §4.61(c)(1)(v)
Reservoir Surface Area	2,500 acres	18 CFR §4.61(c)(1)(vi)
Storage Capacity	13,000 acre-feet	18 CFR §4.61(c)(1)(vi)
Maximum Powerhouse Capacity (per installed unit)	2,773 cfs	18 CFR §4.61(c)(1)(vii)
Minimum Powerhouse Capacity (per installed unit)	295 cfs	18 CFR §4.61(c)(1)(vii)
Mean Annual Stream Flow	3,488 cfs	18 CFR §4.61(c)(1)(vii)

A.4.2.1 Operation - 18 CFR §4.61 (c)(1)(iii)

The Project is manually operated as a run-of-river and maintains a target elevation of 1174.04 feet (NGVD) with fluctuations limited to 0.1 feet [6]. The Project is not used for peaking. Run-of-river mode may be temporarily modified in the event of an emergency if the Minnesota Department of Natural Resources (MNDNR) agrees, but the FERC must be notified as soon as possible following the event. The addition of the sixth turbine involves no change to the dam or reservoir or to the existing operations of the present Project or its reservoir. The Project will remain run-of-river with inflow matching outflow. The only change is that water will flow through the powerhouse via the sixth turbine instead of passing over the gated spillway section.

A.4.2.2 Average Annual Generation - 18 CFR §4.61 (c)(1)(iv)

Table A-4 provides monthly net energy generation for the Project from 2013 through 2020. Based on generation records for 2013 to 2020, the average annual net generation is calculated at approximately 19,392 megawatt-hours (MWhs). The annual generation for this period ranged from a high of 21,166 MWh, in 2016, to a low of 16,511 MWh, in 2013.

Table A-4 Monthly Net Energy 2013–2020 (MWh)

Year	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Total	Avg
2013	1,522	1,372	1,801	1,618	898	1,110	1,461	1,005	890	1,446	1,664	1,724	16,511	1,376
2014	1,854	1,664	1,845	1,449	887	1,039	1,673	2,006	1,619	2,029	1,972	1,876	19,913	1,659
2015	1,544	1,349	1,658	1,306	1,465	1,756	1,906	1,375	1,707	1,865	1,805	1,864	19,601	1,633
2016	1,955	1,639	1,709	1,561	1,806	1,914	1,370	1,875	1,892	1,954	1,929	1,562	21,166	1,764
2017	1,830	1,668	1,676	1,446	1,371	1,916	1,657	1,508	1,630	1,639	1,898	1,980	20,219	1,685
2018	1,710	1,377	1,608	1,635	1,796	1,516	1,411	1,762	1,843	1,567	1,664	1,946	19,835	1,653
2019	1,870	1,675	1,757	789	957	1,625	1,746	2,013	1,809	1,201	1,353	1,691	18,485	1,540
2020	1,483	1,505	1,650	717	1,737	1,477	1,315	1,696	1,948	1,968	1,873	2,039	19,408	1,617
Avg	1,721	1,531	1,713	1,315	1,365	1,544	1,567	1,655	1,667	1,709	1,770	1,835	19,392	-

The Project's annual average generation for 2013 to 2020 was 19,392,000 kWh. This represents approximately 10,600 tons of coal, 35,500 barrels of crude oil, 1,360,000 gallons of fuel oil, 1,480,000 gallons of diesel oil, or 196 million cubic feet of natural gas to generate the same amount of power [7], [8], [9]. The Project's calculated power factor, based on the installed capacity and average generation between 2013 and 2017, is 0.756. The power factor is the Project's ability to convert water flow into generation (actual generation divided by installed capacity). The equation to calculate the power factor is $(19,392 \text{ MWh/yr}) / (2.9425 \text{ MW} * 8760 \text{ hours/year}) = 0.752$.

A.4.2.3 Average Head - 18 CFR §4.61 (c)(1)(v)

At normal pool, the estimated average head on the plant is 20 feet. The Project has a normal pool elevation of 1174.0 ± 0.1 feet [6]. The Project's peak inflow design flood (IDF) was estimated to be 56,850 cubic feet per second (cfs) [10]. The reservoir elevation during the peak IDF discharge was estimated to be elevation 1183.1 feet (NGVD).

A.4.2.4 Reservoir Data - 18 CFR §4.61 (c)(1)(vi)

At normal pool the reservoir has a surface area of about 2,500 acres and storage capacity of 13,000 acre-feet. The total contributing drainage area at the dam is approximately 7,320 square miles.

A.4.2.5 Plant Hydraulic Capacity - 18 CFR §4.61 (c)(1)(vii)

The hydraulic capacity range for the powerhouse from each of the five existing turbines, installed in flumes 1 through 5, is 295 to 2,773 cfs. If the flow is less than 295 cfs, (i.e. the hydraulic capacity of one unit) [6], flow is passed over the spillway and the powerhouse is shut down. Once flows reach 295 cfs, the powerhouse is used to regulate flow to maintain the reservoir level during normal flows. Once flows exceed the available powerhouse capacity (approximately 2,773 cfs) [6], the gates are operated to pass remaining flows. In this case, the outflow is equal to the flow through the turbines plus the flow over the spillway. Turbines continue to operate during high-flow conditions. The Project can maintain a constant pool elevation of 1174.0 NGVD up to an inflow of 13,000 cfs. For greater flows, the pool elevation starts to rise, and flow is regulated by discharge capacity.

A.4.2.6 Average Flow Data - 18 CFR §4.61 (c)(1)(vii)

Historical flood data for this Project is gathered from the U.S. Geological Survey (USGS) gaging stations at Aitkin (52 miles upstream of Brainerd) and Royalton (48 miles downstream from Brainerd). A USGS gage was installed at Brainerd in 1987. Average monthly flow data from the Brainerd gage is shown for the last 10 years in Table A-5. The minimum, maximum, and average discharge for the gages are shown in Table A-6. The annual and monthly flow duration curves for the Project are in Exhibit A-2 of Appendix A. The minimum, mean, and maximum daily flows from the Brainerd gage for the period of record are 348 cfs, 3,488 cfs, and 17,900 cfs, respectively.

Table A-5 Average Monthly Flows for USGS Gage 052452300 (2009-2019)

Year	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
2009	1,652	2,129	4,339	8,987	6,508	3,539	1,690	991	618	1,179	3,079	2,072
2010	2,212	2,050	3,013	1,656	2,501	1,652	2,167	2,769	2,503	3,735	6,925	3,714
2011	3,338	3,068	3,086	7,385	8,468	6,217	4,854	3,525	1,647	1,411	1,650	1,590
2012	1,400	1,338	1,839	2,970	6,209	12,540	11,590	3,535	1,170	885	1,195	2,044
2013	1,716	1,717	1,687	4,495	9,139	7,481	4,885	1,522	1,017	2,242	2,520	1,969
2014	2,116	2,120	2,264	7,093	10,900	10,010	5,952	3,685	3,506	3,018	2,619	2,020
2015	1,791	1,646	1,831	1,370	5,176	4,798	2,667	1,727	2,253	2,149	4,209	4,415
2016	3,669	3,196	5,252	5,795	4,462	3,477	8,002	4,047	3,522	3,436	3,215	4,864
2017	3,541	3,611	5,008	6,977	7,770	3,387	1,992	2,041	3,055	5,638	3,336	2,903
2018	1,956	1,647	1,680	3,113	4,629	6,540	7,050	2,458	2,903	5,896	5,027	3,267
2019	2,604	2,187	3,252	9,904	9,386	4,484	4,826	2,866	3,400	8,157	7,028	4,375
Monthly Mean ⁽¹⁾	2,475	2,290	2,739	5,677	6,014	4,727	4,234	2,382	2,166	2,983	3,350	2,851

(1) Monthly mean based on data from May 1987 to December 2017

Table A-6 USGS Stream Gage Data

Gage	Drainage Area (mi ²)	Period of Record	Minimum Discharge (cfs)	Mean Discharge (cfs)	Maximum Discharge (cfs)
05227500 at Aitkin	6,140	1945 to 2017	153 (Sept. 1, 1961)	2,929	19,900 (May 20, 1950)
05242300 at Brainerd	7,320	1987 to 2017	348 (July 30, 1988)	3,488	17,900 (June 26, 2012)
05267000 near Royalton	11,600	1924 to 2017	254 (Nov. 25, 1937)	4,912	38,200 (April 8, 1997)

A.4.3 Developmental Resources – 18 CFR §4.61(c)(1)(viii)

Exhibit A-3 in Appendix A shows the relative locations and physical interrelationships of the principal Project features. Detailed descriptions for each of these features, including the composition and dimensions of each feature, are in Sections A.4.3.1 through A.4.3.9.

A.4.3.1 Dam

The dam structures include a short left abutment, a 256-foot-long powerhouse, 78-foot-long slide gate section, 207-foot-long bascule (crest) gate section, single 20-foot-wide steel tainter gate, and 300-foot-long right embankment, as shown in Figure A-2. An isometric view is presented in Figure A-3.

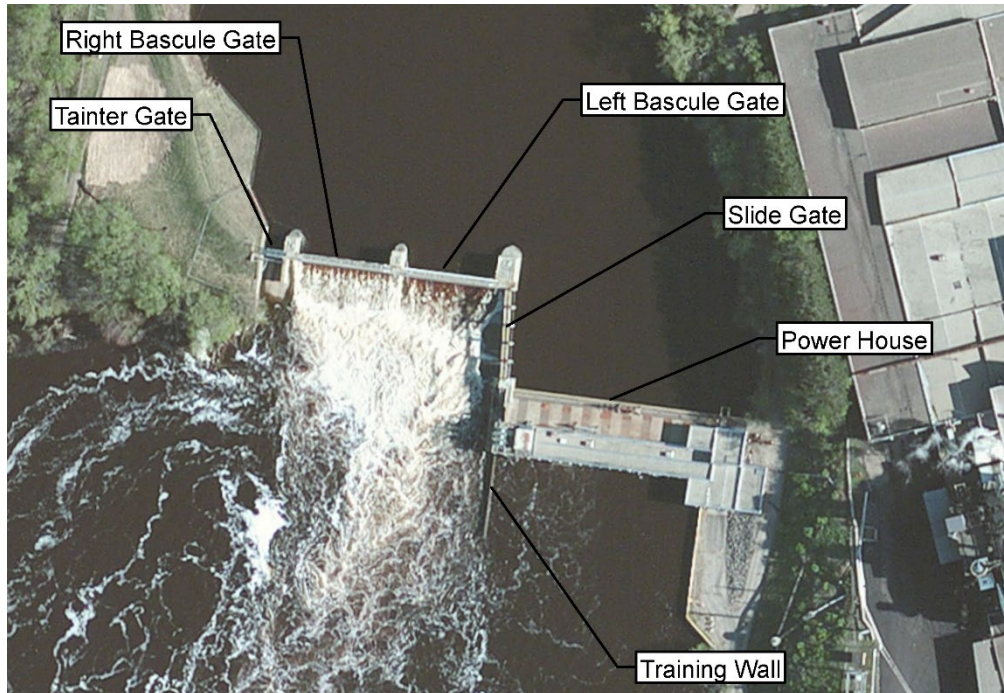


Figure A-2 Project Overview

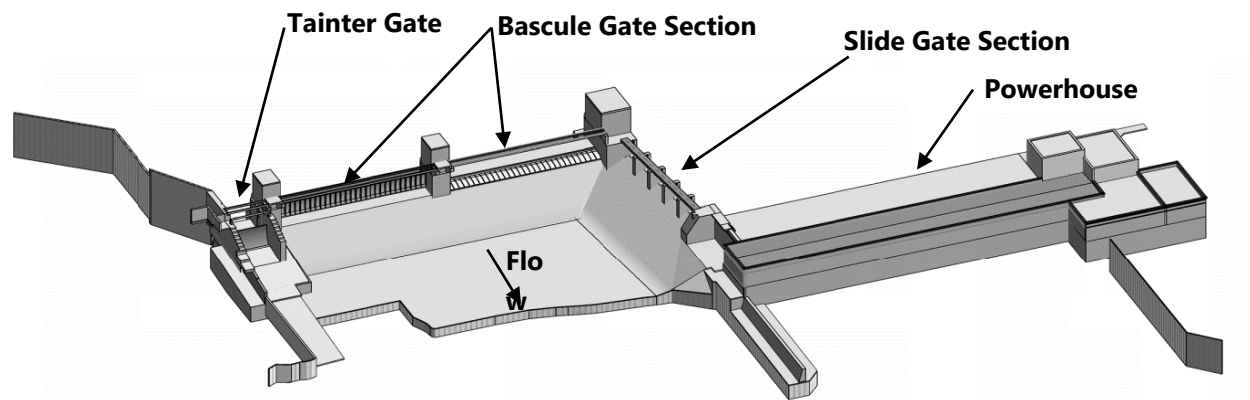


Figure A-3 Isometric View of Project

A.4.3.2 Left Abutment

The left abutment, also referred to as an embankment in some project data, consists of a retained fill area covered with bituminous pavement connecting the left end of the powerhouse to high ground. The left abutment includes a stoplog closure on the upstream end and a sheetpile wall on the downstream end.

The left abutment varies from approximately 16-foot wide at the upstream end at the stoplog closure to approximately 60-foot wide near the sheetpile wall. The total length of the left abutment is 183 feet long.

A.4.3.2.1 Left Abutment Stoplog Closure

Towards the upstream edge of the powerhouse, the highpoint for the bituminous covered fill area is at approximate elevation 1179.84 NGVD. In 2000, an above-ground-stoplog closure was added to prevent overtopping during the Inflow Design Flood (IDF) (9). The stoplog closure raised the left abutment damming surface 4 feet; to elevation 1183.84 NGVD. The closure extends approximately 48 feet between the powerhouse and high ground to the east. A 16-foot-wide gap in the stoplog closer is closed with stoplogs during high flow events. In 2020, BPU added a new steel section to increase the height of the closure to 1184.1 NGVD.

A.4.3.2.2 Left Abutment Sheetpile Wall

Directly downstream from the powerhouse, the left abutment is retained by a steel sheetpile wall, which was placed in the early 1990s. The sheetpile wall is attached to soldier pile deadman with cable anchors. When the sheetpile wall was constructed, the existing timber retaining wall and timber cribbing was encased within the fill placed behind the sheetpile wall. The sheetpile wall extends nearly 100 feet downstream of the powerhouse before turning approximately 45-degrees connecting to high ground

A.4.3.3 Powerhouse

The 59-foot-wide by 256-foot-long powerhouse is a reinforced concrete structure founded on timber piling with a brick superstructure. The powerhouse is 34.5-foot-high measured from the floor of the tailrace to the top of the powerhouse roof. The flumes are numbered 1 through 10. Flume one is closest to the river and flume 10 is closest to the left abutment. Five of the original 10 flumes are currently used for power generation. Turbines are located in flumes 1 through 5, a new turbine is planned in flume 6, flumes 7 through 9 are sealed with concrete, and flume 10 is used for firewater.

A.4.3.3.1 Powerhouse Intake

At the upstream end of the powerhouse, there is a trashrack (3-inch by ¼-inch bars spaced 2-inches on center) to prevent large debris from entering the intake. Directly below the trashrack, there is a concrete key on the intake structure down to elevation 1139.84 NGVD with steel sheetpiling extending below the key. The top elevation of the intake concrete is 1176.84 NGVD.

A.4.3.4 Slide Gate Section

The slide gate section is 78 feet, as measured between Pier 4 (the pier adjacent to the powerhouse) and Pier 3 (the pier connecting the bascule gate section and slide gate section). This section consists of five 13.6-foot-wide by 5-foot-high vertical steel gates, four intermediate piers, guide assemblies, and a spillway section. The spillway section varies in length due to the orientation of the slide gate section to the bascule gate section but is approximately 32-foot-long and 78-foot wide. During reconstruction of the Project in the 1950s, a steel sheetpile was installed and grouted along the upstream side of the slide gate sections, serving as a cofferdam; the rock-filled timber cribbing was consolidated, a reinforced-concrete

spillway facing was installed over the consolidated timber cribbing, serving as the spillway, and the gates (also referred to as stop logs) and guide assemblies were installed.

A.4.3.5 Bascule Gate Section

The bascule gate section is 207 feet, as measured from the left side of Pier 3 (the pier connecting the bascule gate section and the slide gate section) to the right side of Pier 1 (adjacent to the tainter gate section). This section consists of the three primary concrete piers on the upstream side of the Project, two 85-foot-wide by 7-foot 10-inch-high bascule gates, a 180-foot wide by 32.3-foot long concrete ogee section measured from the upstream side of the gate to the apron, and a spillway apron. The spillway apron varies in length from 55-foot-long to 90-foot long and varies in width but is approximately 150-foot wide. During reconstruction of the Project in the 1950s, a cellular-steel-sheetpile system was installed and grouted upstream from the existing structure serving as a cofferdam; the rock-filled timber cribbing was consolidated, the piers were constructed, a reinforced-concrete ogee facing was installed over the consolidated timber cribbing serving as the spillway, and the gates were installed. In 2017, the spillway apron was overlaid to elevation 1153.17 feet NGVD by anchoring reinforced concrete into the existing apron. A vertical sheetpile extends across the Project on the downstream edge of the spillway apron.

A.4.3.6 Tainter Gate

The tainter gate section is 20.5 feet, as measured from the left, as measured from the right side of Pier 1 (adjacent to the bascule section) to the right abutment wall. The tainter gate is 19.5-foot-wide by 11-foot-high. A wooden tainter gate was replaced with a steel tainter gate, in 2000. In 2017, repairs were made to the spillway section, downstream from the tainter gate, by anchoring a reinforced concrete overlay onto the existing section.

A.4.3.7 Right Embankment

The right embankment is 300-foot-long, as measured along the crest of the embankment, was constructed of earth-fill over rock-filled timber cribs with a 10-foot-wide embankment crest. The earthen embankment was raised to elevation 1184.84 feet NGVD, which included 1.3 feet of freeboard for long-term settlement, by constructing a sheetpile wall on the upstream side of the embankment and filling in behind the sheetpile with earth. The current crest elevation is at approximate elevation 1184 feet NGVD which is within the range of anticipated settlement, for a total for a total height of approximately 30 feet. The sheetpile wall, which is 30-feet deep, extends for 149 feet from its connection point with the tainter gate section and is anchored by concrete deadmen and steel tiebacks.

A.4.3.8 Tailrace Section

Ten flumes were originally constructed for power generation. Only five of the 10 flumes are currently used, and a sixth flume is expected to be operational in the future when the new turbine is installed. Below the draft tubes is a concrete floor. At the end of the concrete floor towards the downstream end of the tailrace, the floor transitions into timber planking.

A.4.3.9 Transmission Line

The Project transmission lines consist of a 236-foot-long 2.4-kilovolt (kV) overhead transmission line running from the powerhouse to a pad-mounted transformer located on the left abutment directly east of the powerhouse. Power is then transferred underground to the distribution grid. The transmission line length is shorter than stated in the existing license due to recent modifications. The 825-foot-long 34.5 kV underground transmission line transfers power from the pad-mounted transformer (owned by BPU) to the distribution grid. The distribution grid is owned by BPU. Refer to Exhibit A-4 in Appendix B.

A.4.4 Estimated Cost of the Project – 18 CFR §4.61(c)(1)(ix)

The Project is an existing, licensed facility. The estimated average annual cost of the Project over the estimated licensing period is provided in Table A-7.

Table A-7 Estimated Annual Project Cost

Description	Cost
Cost of Debt Capital - Interest	\$100,200
Local, State, and Federal Taxes	-
Depreciation and Amortization	\$328,200
Generation Expenses	
Personal Services	\$458,400
Operations and Maintenance	\$34,200
Employee Benefits	\$147,600
Licenses	\$32,400
Training	\$3,600
General and Administrative	
Personal Services	\$44,400
Operations and Maintenance	\$40,200
Property and Liability Insurance	\$62,400
Employee Benefits	\$20,400
Total Annual Costs	\$1,272,000

A.4.5 Estimated Capital Costs and Estimated Annual Operation and Maintenance Costs of Proposed Environmental Measures – 18 CFR §4.61(c)(1)(x)

The estimated capital costs and estimated annual operation and maintenance costs of proposed environmental measures will be available in Table A-8. The costs in Table A-8 reflect the proposed environmental measures discussed in Section E.7.2.

Table A-8 Estimated Proposed Environmental Measures

Description	Capital Costs	Annual O&M Costs
Maintain Target Reservoir at Elevation 1174.04 feet NGVD	-	\$90,000
Recreation Management Plan Development	\$15,000	-
Recreation Management Plan Monitoring and Reporting	-	\$1,900
Recreation Management Plan Maintain FERC-approved recreation facility owned by BPU	-	\$1,200
Cultural Monitoring Plan Development	\$30,000	-
Cultural Monitoring Plan Monitoring and Reporting	-	\$20,700
Cultural Monitoring Plan Future Implemented Measures	-	\$5,000

Table Notes:

- Maintaining the reservoir at the Project requires the project to be staffed 24-hours a day and 7-days per week. The operations costs to maintain the reservoir were computed as 25-percent of the labor costs to operate the facilitate due to the hourly reporting requirements. Maintenance costs to maintain the reservoir are based on the costs to maintain the flow control equipment including the spillway gates and wicket gates.
- Costs associated with the recreation management plan and monitoring assumes that the plan will be similar to the current license with a plan monitor usage of the recreation sites near the Project Boundary with reporting every six years.
- Maintenance of the BPU owned recreation facility includes the operations and maintenance costs associated with the canoe portage, bathrooms, and associated signage.
- Costs associated with the cultural monitoring plan assumes that the plan and monitoring activities will be similar to the current license with a plan developed in coordination with stakeholders, such as SHPO and FERC, with monitoring of the sites every three years.
- Costs associated with implementation measures associated with the cultural monitoring plan include erosion protection that is occasionally required at some of the sites.

A.5 Purpose of the Project – 18 CFR §4.61(c)(2)

The primary purpose of the Project is hydropower generation.

A.6 Estimated Cost of Relicensing – 18 CFR §4.61(c)(3)

The total estimated cost of relicensing for this Project, including consultation, studies, administrative and legal costs is estimated to be \$400,000.

A.7 On-Peak and Off-Peak Project Power – 18 CFR §4.61(c)(4)

The Project is operated a run-of-river Project; therefore, on-peak and off-peak power is not applicable for this application.

A.8 Estimated Change in Project Generation – 18 CFR §4.61(c)(5)

No changes in project generation are proposed; therefore, an estimated change in project generation is not applicable for this application.

A.9 Undepreciated Net Investment – 18 CFR §4.61 (c)(6)

The remaining undepreciated net investment, or book value, of the Project is \$4.6 million.

A.10 Annual Operation and Maintenance – 18 CFR §4.61(c)(7)

The annual operation and maintenance expense of the Project (based on historical data), including labor and overhead associated with operations and maintenance is \$600,000.

A.11 Single Line Electrical Diagram – 18 CFR §4.61(c)(8)

A single-line diagram for the Project is included in Exhibit A-5 in Appendix B, which is filed as Critical Energy Infrastructure Information (CEII).

A.12 Safe Management – 18 CFR §4.61(c)(9)

Measures taken to ensure safe management, operation, and maintenance of the Project are included in the Owner's Dam Safety Program (ODSP) for the Project, which includes the following:

- Consultant's Safety Inspection Reports (CSIR): A CSIR is the documentation of an inspection performed every five years in accordance with 18 CFR §12 Subpart D.
- Dam Safety Surveillance and Monitoring Plan (DSSMP) and Dam Safety Surveillance and Monitoring Report (DSSMR): A DSSMP summarizes the surveillance and instrumentation monitoring activities that are performed to track and evaluate dam performance. A DSSMR is submitted annually documenting the findings from surveillance and monitoring activities.
- Emergency Action Plan (EAP): An EAP documents a plan for actions to be taken in an emergency. The plan includes warnings for inhabitants, property owners, operators of water-related facilities, recreational users, and other persons in the vicinity who might be adversely affected by a sudden release of water at the dam. The EAP contains Notification Flowcharts to be used in the event of an emergency. Annual reviews and tests of the EAP are performed by BPU to maintain current information and maintain. BPU performs a Tabletop evaluation and functional exercise every five years to further test the EAP.
- Potential Failure Mode Analysis Report: A potential failure mode analysis (PFMA) was performed for the Brainerd Dam in 2008 and updated in 2018. A review of the PFMA is conducted as part of

the Part 12D inspection. The purpose of the PFMA is to determine likely potential failure scenarios and identify potential risk-reduction measures to minimize the likelihood of occurrence of the consequences.

- Security Plan and Assessment: BPU maintains a security plan for the Brainerd Dam that documents the standard operating procedures related to all security concerns (physical, cyber, and procedural) at the dam. BPU updates the security plan annually to keep information current and maintain readiness.
- Supporting Technical Information Document: BPU maintains a current STID, which is a compilation of all relevant technical information for the dam in one central location. The STID is reviewed and updated regularly.
- Public Safety Plan: BPU maintains an updated public safety plan for the Project outlining safety measures in place at the Project for the benefit of the public. These measures include water level indicators, boat barriers, signage, handrails, lighting, and fencings.

**DRAFT APPLICATION FOR LICENSE
FOR A MAJOR WATER POWER PROJECT – 5 MEGAWATTS OR LESS
EXISTING DAM**

**BRAINERD HYDROELECTRIC PROJECT
FERC PROJECT NO. 2533**

Exhibit B Project Operation and Resource Utilization

(Pursuant to 18 CFR §5.18(a)(5)(i))

B.1 Applicability

Exhibit B is not required for this application. 18 CFR §5.18(a)(5)(i) defines the contents of the application license for a major water project 5 MW or less includes the general instructions, initial statement and Exhibits A, F, and G in accordance with 18 CFR §4.61, Exhibit E in accordance with 18 CFR §5.18(b), and Exhibit H in accordance with 18 CFR §5.18(h).

**DRAFT APPLICATION FOR LICENSE
FOR A MAJOR WATER POWER PROJECT – 5 MEGAWATTS OR LESS
EXISTING DAM**

**BRAINERD HYDROELECTRIC PROJECT
FERC PROJECT NO. 2533**

Exhibit C Proposed Construction Schedule

(Pursuant to 18 CFR §5.18(a)(5)(i))

C.1 Applicability

Exhibit C is not required for this application. 18 CFR §5.18(a)(5)(i) defines the contents of the application license for a major water project 5 MW or less includes the general instructions, initial statement and Exhibits A, F, and G in accordance with 18 CFR §4.61, Exhibit E in accordance with 18 CFR §5.18(b), and Exhibit H in accordance with 18 CFR §5.18(h).

**DRAFT APPLICATION FOR LICENSE
FOR A MAJOR WATER POWER PROJECT – 5 MEGAWATTS OR LESS
EXISTING DAM**

**BRAINERD HYDROELECTRIC PROJECT
FERC PROJECT NO. 2533**

Exhibit D Project Costs and Financing

(Pursuant to 18 CFR §5.18(a)(5)(i))

D.1 Applicability

Exhibit D is not required for this application. 18 CFR §5.18(a)(5)(i) defines the contents of the application license for a major water project 5 MW or less includes the general instructions, initial statement and Exhibits A, F, and G in accordance with 18 CFR §4.61, Exhibit E in accordance with 18 CFR §5.18(b), and Exhibit H in accordance with 18 CFR §5.18(h).

**DRAFT APPLICATION FOR LICENSE
FOR A MAJOR WATER POWER PROJECT – 5 MEGAWATTS OR LESS
EXISTING DAM**

**BRainerd HYDROELECTRIC PROJECT
FERC PROJECT No. 2533**

Exhibit E Environmental Report

(Pursuant to 18 CFR §5.18(b))

E.1 Applicability

Exhibit E is required for this application. 18 CFR §5.18(a)(5)(i) defines the contents of the application license for a major water project 5 MW or less includes the general instructions, initial statement and Exhibits A, F, and G in accordance with 18 CFR §4.61, Exhibit E in accordance with 18 CFR §5.18(b), and Exhibit H in accordance with 18 CFR §5.18(h).

E.2 Introduction

Brainerd Public Utilities Commission (BPU) owns and operates the Brainerd Hydroelectric Project (Project), Federal Energy Regulatory Commission (FERC) Project No. 2533. The Project is located in Crow Wing County, Minnesota, on the Mississippi River in the City of Brainerd, as shown in Figure E-1. The Project is located approximately 130 miles north of the Minneapolis – St. Paul metropolitan area.

E.2.1 License History

BPU is filing this Draft License Application (DLA) with the FERC for the relicensing of the Project. BPU's existing FERC license expires February 28, 2023. BPU has followed FERC's Integrated Licensing Process (ILP) as established in regulations issued by the FERC July 23, 2003 (Final Rule, Order No. 2002), and found in Title 18 of the U.S. Code of Federal Regulations (18 CFR), Part 5, during the relicensing process.



Figure E-1 Project Location

The original dam was authorized by an Act of Congress in 1886 [2]. The dam was damaged by a flood in the spring of 1950 and the U.S. Army Corps of Engineers (USACE) approved reconstruction on May 18, 1951 [3]. The FERC issued a license to the Northwest Paper Division of Potlatch Corporation on December 10, 1976, and the Project was relicensed for 30 years to Potlatch Corporation on March 2, 1993. License transfers to various entities were approved by FERC on the dates shown below [4]:

- Missota Paper Company, LLC on April 8, 2003
- Wausau Paper of Minnesota, LLC on October 21, 2004
- Wausau Paper Printing and Writing, LLC on December 28, 2006
- Wausau Paper Mills, LLC on March 10, 2010
- City of Brainerd and its Public Utilities Commission on March 13, 2014

Transfer of the license officially occurred when BPU purchased the Project on June 13, 2014. At the time of the purchase, the Project boundaries were changed, removing the paper mill adjacent to the Project from within the Project boundaries.

On August 4, 2016, a non-capacity license amendment application was submitted to the FERC. The amendment was for the proposed permanent addition of a 600 kW turbine. On July 19, 2016, the FERC approved the amendment and changed the licensed installed capacity of the Project to 3,542.5 kW; however, the current installed capacity remains at 2,942.5 kW until the new turbine is installed.

E.2.2 Purpose of Action and Need for Power

The format of this Exhibit E, as defined by 18 Code of Federal Regulations (CFR) § 5.18 requires the exhibit to follow FERC's guidelines for preparing an Environmental Analysis (EA), and Pursuant to 18 CFR § 5.18(b)(5)(i)(B), must also, to the extent reasonably possible, describe the effects of preliminary terms and conditions filed with FERC by resource agencies. No specific terms and conditions had been filed at the time of this analysis.

FERC determines if a license will be issued to BPU for continued Project operation and what conditions should be placed should a license be issued. In addition to the power and developmental purposes for which licenses are issued, FERC gives equal consideration to the purposes of energy conservation, the protection, mitigation of damage to, and enhancement of fish and wildlife, the protection of recreational opportunities, and the preservation of other aspects of environmental quality. Issuing a new license for the Project would allow BPU to generate electricity at the Project for the term of a new license.

The Project is operated to produce hydroelectric power which is sold to the power provider.

E.3 General Description of the River Basin – 18 CFR § 5.18(b)(1)

E.3.1 Overview

The Mississippi River originates in an area of small lakes in northwestern Minnesota at Lake Itasca and empties into the Gulf of Mexico downstream from New Orleans, Louisiana. The Mississippi River is approximately 2,350 miles long with an elevation drop of approximately 1,475 feet. The Project is located

at River Mile 1003.7 [11]. Mississippi River State Water Trail maps showing the river system from Lake Itasca to its confluence with the Minnesota River near St. Paul, Minnesota near River Mile 844 are included Exhibit E-1 in Appendix C. The Project is located in the Upper Mississippi River basin, which is predominantly forest. The drainage area of the Upper Mississippi River Basin is approximately 7,320 square miles. The Project is located within the Mississippi River – Brainerd Watershed (MRBW), which is likewise heavily forested. The watershed is described as a glaciated region having gravelly and sandy outwash material [12].

E.3.1.1 Mississippi River-Brainerd Watershed

The MRBW covers 1,079,950 acres in the north-central part of the Upper Mississippi River Basin in central Minnesota. The watershed boundary begins in Aitkin County where the river flows through the cities of Aitkin, Brainerd, Baxter, and Little Falls. The primary ecosystem in the watershed is Northern Lakes and Forest (81-percent) & Northern Central Hardwood Forest (19-percent). An assessment for the MRBW [13] defined three management zones in the MRBW. The Project Area is primarily contained within the central management zone, which is the transition zone between the northern wetlands and forests to the southern prairies and wetlands, and has lake and stream water quality impairments but the overall water quality is good [13].

E.3.1.2 Project Drainage Area's Tributary Streams

Named tributaries to Mississippi River in the Project Boundary include the Rabbit River, Whiteley Creek, and Sand Creek.

E.3.1.3 Project Reservoir and Storage

The Project has a normal pool elevation of 1174.0 ± 0.1 feet [6]. At normal pool the reservoir has a surface area of about 2,500 acres and storage capacity of 13,000 acre-feet.

E.3.1.1 Dams and Diversions along the River

In addition to the dam associated with the Project, there are seven dams located between the Headwaters of the Mississippi River and the Project location along the Mississippi River. There are an additional five dams located downstream from the Project prior to encountering the first lock and dam on the Mississippi in Minneapolis, Minnesota. Many of these dams were initially constructed for logging. Many of the remaining structures provide flood control and/or hydropower.

E.3.2 Climate

The Project region experiences mild, relatively humid summers and cold winters. Average July air temperatures in the Project vicinity range from a daily average maximum of 80 degrees Fahrenheit to an average daily minimum of 57 degrees Fahrenheit. The daily average maximum air temperature for January is approximately 20 degrees Fahrenheit while the daily average minimum temperature is minus 4 degrees Fahrenheit. The average total annual precipitation is 28.38 inches with average annual snowfall of 46.00 inches [14].

E.3.3 Major Water Uses

The Mississippi River is used for a variety of uses, including barge transportation well downstream of the Project, as well as power generation, water supply, and recreation in the more proximate vicinity of the Project. Power generation in the vicinity primarily consists of hydropower, while nearby communities pull water from the Mississippi River for municipal purposes. Recreational opportunities include fishing, swimming, canoeing, kayaking, tubing/floating, and hunting.



Source: MPCA WRAPS Report Summary [13]

E.3.4 Major Land Uses

Figure E-2 Land Use Mississippi River- Brainerd

The Watershed Restoration and Protection Strategy summary report for the MRBW indicates that most of the land is wetland and forested with 36-percent forest, followed by row crop and grassland at 10-percent each, pasture at 8-percent, and open water and developed land at 6-percent each as shown in Figure E-2.

E.3.5 Economic Activities

The Project is located near the City of Brainerd, Minnesota in Crow Wing County. The largest employment industries in Crow Wing County are Healthcare (25-percent) and Tourism (22-percent), accounting for nearly half of all employment in the county, followed by Education and Manufacturing at 13-percent each, Retail, Government, and Technical Services at 9-percent, 8-percent, and 5-percent respectively. The remaining major industries (energy, construction, communication, and transportation) are each less than 2-percent of the total from the major industries [15].

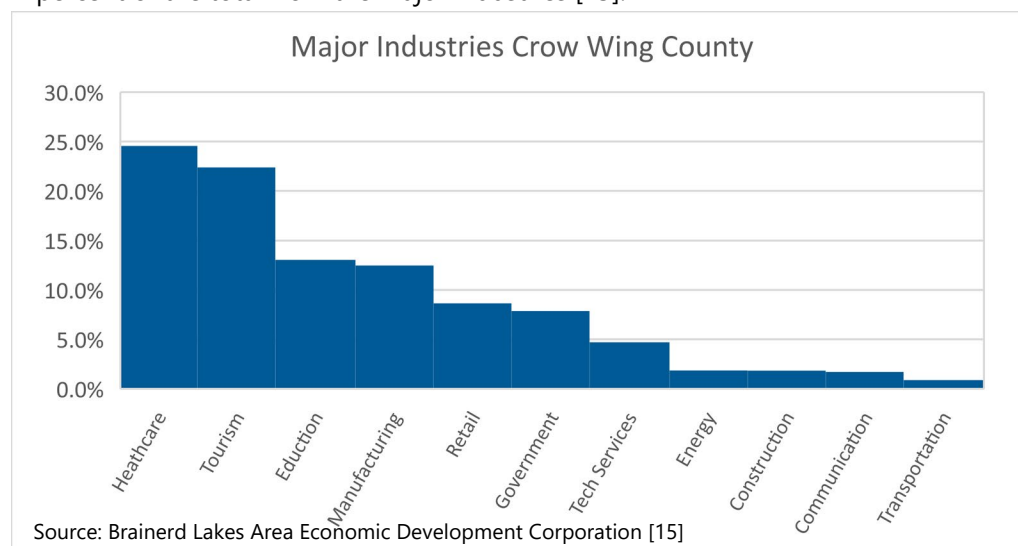


Figure E-3 Major Industries in Crow Wing County

E.4 Cumulative Effects – 18 CFR § 5.18(b)(2)

According to the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (NEPA) 40 CFR § 1508.1(g)(3), An agency's analysis of effects shall be consistent with 40 CFR § 1508.1(g). Cumulative impact, defined in 40 CFR § 1508.7, has been repealed. 40 CFR § 1508.1(g) states:

Effects or impacts means changes to the human environment from the proposed action or alternatives that are reasonably foreseeable and have a reasonably close causal relationship to the proposed action or alternatives, including those effects that occur at the same time and place as the proposed action or alternatives and may include effects that are later in time or farther removed in distance from the proposed action or alternatives.

(1) Effects include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic (such as the effects on employment), social, or health effects. Effects may also include those resulting from actions that may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial.

(2) A "but for" causal relationship is insufficient to make an agency responsible for a particular effect under NEPA. Effects should generally not be considered if they are remote in time, geographically remote, or the product of a lengthy causal chain. Effects do not include those effects that the agency has no ability to prevent due to its limited statutory authority or would occur regardless of the proposed action.

E.4.1 Cumulatively Effects Analysis

Through scoping, agency consultation, review of the Pre-Application Document (PAD), and Commission staff's preliminary analyses, the Commission noted in its Scoping Document 2 (SD2) [16] issued on August 10, 2018 that the Commission has not identified any resources that could be cumulatively affected by the proposed continued Project operation.

E.4.1.1 Geographic Scope

The geographic scope of the analysis for cumulatively affected resources is defined by the physical limits or boundaries of (1) the proposed action's effect on the resource, and (2) contributing effects from other hydropower and non-hydropower activities within the Basin. Because the proposed action can affect resources differently, the geographic scope for each resource may vary. In the Revised Study Plan (RSP) [17], issued by BPU on December 10, 2018, the geographic scope for the studies included:

- immediately upstream and within 450-feet downstream of the Project for the dissolved oxygen and temperature study;
- within the Project Boundary for the cultural resources and recreation studies; and
- at the Project and potential effects on the health of the Upper Mississippi River fishery for the fish entrainment and impingement study.

E.4.1.2 Temporal Scope

The temporal scope of cumulative effects analysis in the exhibit addresses past, present and reasonably foreseeable future actions and their effects on each resource that may be cumulatively affected. Based on the potential terms of the new licenses, the temporal scope of this analysis would need to address reasonably foreseeable actions 30-50 years into the future.

E.5 Applicable Laws – 18 CFR § 5.18(b)(3)

E.5.1 Federal Power Act

Issuance of a new license for the Project is subject to requirements under the Federal Power Act (FPA) and other federal statutes.

E.5.1.1 Section 18 Fishway Prescriptions

Under Section 18 of the FPA, the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) have the authority to prescribe fishways at federally regulated hydropower projects. There are no upstream fish passage facilities in place. No preliminary prescriptions have been filed by either agency.

E.5.1.2 Section 4(e) Conditions

Section 4(e) of the FPA provides that any license issued by FERC for a project within a federal reservation shall be subject to and contain such conditions as the Secretary of the responsible federal land management agency deems necessary for the adequate protection and use of the reservation. This Project does not encompass any federal lands; therefore, these conditions do not apply.

E.5.1.3 Section 10(j) Recommendations

Under Section 10(j) of the FPA, FERC must consider recommendations provided by federal and state fish and wildlife agencies for the protection, mitigation or enhancement of fish and wildlife resources affected by the Project prior to issuing the new license. FERC will include these conditions unless it determines that they are inconsistent with the purposes and requirements of the FPA or other applicable law. No preliminary 10(j) recommendations have been provided for inclusion in this application.

E.5.1.4 Section 401 of the Clean Water Act – 18 CFR § 5.18(b)(3)(i)

Section 401 of the Clean Water Act (CWA) requires the Applicant to obtain certification from the appropriate state pollution control agency verifying compliance with the CWA or to obtain a waiver of certification. The Minnesota Pollution Control Agency (MPCA) is the state agency responsible for water quality certifications for the Project. The Project was issued a water quality certification during relicensing in 1993. When BPU applied for a non-capacity amendment in 2016, MPCA noted in a letter to BPU dated March 18, 2016, that the MPCA believed at that time that the original Section 401 Certification for the Project remained in effect because there were no significant structural changes, no change to the dam or reservoir, and no changes to the existing operation of the Project. This response from the MPCA was submitted to the FERC in a letter dated March 21, 2016 (Exhibit E-2 in Appendix C).

In August 2020, the MPCA stated that the aforementioned March 18, 2016, letter is the most current correspondence on the matter and confirmed that the original Section 401 water quality certification remains in effect. This determination was contingent on the fact that BPU is only relicensing its existing facilities, with no significant structural changes, no change to the dam or reservoir, and no changes to the existing operation of the Project. Consultation with the MPCA will continue through the licensing process.

E.5.1.5 Endangered Species Act – 18 CFR § 5.18(b)(3)(ii)

Under provisions of Section 7(a)(2) of the Endangered Species Act (ESA), a federal agency that authorizes, permits, or carries out activities must consult with USFWS to ensure that its actions will not jeopardize the continued existence of any listed species. A federal agency is required to consult with the USFWS if an action “may affect” listed species or designated critical habitat, even if the effects are expected to be beneficial. A “may affect” determination includes actions that are “not likely to adversely affect,” as well as “likely to adversely affect” listed species. If the action is “not likely to adversely affect” listed species (i.e., the effects are beneficial, insignificant, or discountable), and if the USFWS agrees with that determination and provides written concurrence thereof, then no further consultation is required. If the action is “likely to adversely affect” listed species, then the federal action agency must request initiation of formal consultation. This request is made in writing to the USFWS and must include a complete initiation package. Formal consultation concludes when the USFWS issues a biological opinion to the federal action agency. More detailed information regarding threatened and endangered species in the Project area is provided in Section E.8.7.

E.5.1.6 Magnuson-Stevens Fishery Conservation and Management Act – 18 CFR § 5.18(b)(3)(iii)

The Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. 1801 et seq.) section 305(b) (2) requires federal agencies to consult with National Oceanic and Atmospheric Administration (NOAA) Fisheries on all actions that may adversely affect Essential Fish Habitat (EFH). NOAA [18] lists no EFH for the Mississippi River.

E.5.1.7 Coastal Zone Management Act – 18 CFR § 5.18(b)(3)(iv)

Section 307(c)(3) of the Coastal Zone Management Act requires that all federally licensed and permitted activities be consistent with approved state Coastal Zone Management Programs. Consultation is included in Exhibit E-12 in Appendix C.

E.5.1.8 National Historic Preservation Act – 18 CFR § 5.18(b)(3)(v)

Section 106 of the National Historic Preservation Act (NHPA) requires that every federal agency consider how each of its undertakings could affect historic properties. Historic properties are any prehistoric or historic districts, sites, buildings, structures, Traditional Cultural Properties (TCPs), and objects significant in American history, architecture, engineering, and culture that are eligible for inclusion in the National Register of Historic Places (NRHP). Additional information is included in Appendix D.

E.5.1.9 Wild and Scenic Rivers and Wilderness Act – 18 CFR § 5.18(b)(3)(vii)

Section 7(a) of the Wild and Scenic Rivers Act requires federal agencies to make a determination as to whether the operation of a project under a new license would unreasonably diminish the scenic,

recreational, and fish and wildlife values present in the designated area. The Mississippi River in the Project Area is not a designated Wild and Scenic River by the National Park Service (NPS) or the State of Minnesota (MDNR 2016a). The Wilderness Act of 1964 established a National Wilderness Preservation System. There are no designated Wilderness areas within or near the Project Area.

E.6 Project Facilities and Operation – 18 CFR § 5.18(b)(4)

E.6.1 Maps of Project Facilities within Project Boundaries – 18 CFR § 5.18(b)(4)(i)

The Project Boundary for the Project is shown on Exhibit E-3 in Appendix C.

E.6.2 Project Configuration – 18 CFR § 5.18(b)(4)(ii)

Exhibit E-4 in Appendix C includes a drawing showing the relative locations and physical interrelationships of the principal Project features. Detailed descriptions for each of these features, including the composition and dimensions of each feature, are included below:

E.6.2.1 Dam

The dam structures include a short left abutment, a 256-foot-long powerhouse, a 78-foot-long slide gate section, a 207-foot-long bascule (crest) gate section, a single 20-foot-wide steel tainter gate, and a 200-foot-long right embankment.

E.6.2.2 Left Abutment

The left abutment, also referred to as an embankment in some project data, consists of a retained fill area covered with bituminous pavement connecting the left end of the powerhouse to high ground. The left abutment includes a stoplog closure on the upstream end and a sheetpile wall on the downstream end. The left abutment varies from approximately 16-foot wide at the upstream end at the stoplog closure to approximately 60-foot wide near the sheetpile wall. The total length of the left abutment is 183 feet long.

E.6.2.2.1 Left Abutment Stoplog Closure

Towards the upstream edge of the powerhouse, the highpoint for the bituminous covered fill area is at approximate elevation 1179.84 NGVD. In 2000, an above-ground-stoplog closure was added to prevent overtopping during the Inflow Design Flood (IDF) (9). The stoplog closure raised the left abutment damming surface 4 feet; to elevation 1183.84 NGVD. The closure extends approximately 48 feet between the powerhouse and high ground to the east. A 16-foot-wide gap in the stoplog closer is closed with stoplogs during high flow events. In 2020, BPU added a new steel section to increase the height of the closure to 1184.1 NGVD.

E.6.2.2.2 Left Abutment Sheetpile Wall

Directly downstream from the powerhouse, the left abutment is retained by a steel sheetpile wall, which was placed in the early 1990s. The sheetpile wall is attached to soldier pile deadman with cable anchors. When the sheetpile wall was constructed, the existing timber retaining wall and timber cribbing was

encased within the fill placed behind the sheetpile wall. The sheetpile wall extends nearly 100 feet downstream of the powerhouse before turning approximately 45-degrees connecting to high ground

E.6.2.3 Powerhouse

The 59-foot-wide by 256-foot-long powerhouse is a reinforced concrete structure founded on timber piling with a brick superstructure. The powerhouse is 34.5-foot-high measured from the floor of the tailrace to the top of the powerhouse roof. The flumes are numbered 1 through 10. Flume one is closest to the river and flume 10 is closest to the left abutment. Five of the original 10 flumes are currently used for power generation. Turbines are located in flumes 1 through 5, a new turbine is planned in flume 6, flumes 7 through 9 are sealed with concrete, and flume 10 is used for firewater.

E.6.2.3.1 Powerhouse Intake

At the upstream end of the powerhouse, there is a trashrack (3-inch by ¼-inch bars spaced 2-inches on center) to prevent large debris from entering the intake. Directly below the trashrack, there is a concrete key on the intake structure down to elevation 1139.84 NGVD with steel sheetpiling extending below the key. The top elevation of the intake concrete is 1176.84 NGVD.

E.6.2.4 Slide Gate Section

The slide gate section is 78 feet measured between Pier 4, the pier adjacent to the powerhouse, and Pier 3, the pier connecting the bascule gate section and slide gate section. This section consists of five steel 13.6-foot-wide by 5-foot-high vertical steel gates, four intermediate piers, guide assemblies, and a spillway section. The spillway section varies in length due to the orientation of the slide gate section to the bascule gate section but is approximately 32-foot-long and 78-foot wide. During reconstruction of the Project in the 1950s, a steel sheetpile was installed and grouted along the upstream side of the slide gate sections serving as a cofferdam; the rock-filled timber cribbing was consolidated, a reinforced-concrete spillway facing was installed over the consolidated timber cribbing serving as the spillway, and the gates (also referred to as stop logs) and guide assemblies were installed.

E.6.2.5 Bascule Gate Section

The bascule gate section is 207 feet, as measured from the left side of Pier 3 (the pier connecting the bascule gate section and the slide gate section) to the right side of Pier 1 (adjacent to the tainter gate section). This section consists of the three primary concrete piers on the upstream side of the Project, two 85-foot-wide by 7-foot 10-inch-high bascule gates, a 180-foot wide by 32.3-foot long concrete ogee section measured from the upstream side of the gate to the apron, and a spillway apron. The spillway apron varies in length from 55-foot-long to 90-foot long and varies in width but is approximately 150-foot wide. During reconstruction of the Project in the 1950s, a cellular-steel-sheetpile system was installed and grouted upstream from the existing structure serving as a cofferdam; the rock-filled timber cribbing was consolidated, the piers were constructed, a reinforced-concrete ogee facing was installed over the consolidated timber cribbing serving as the spillway, and the gates were installed. In 2017, the spillway apron was overlaid to elevation 1153.17 feet NGVD by anchoring reinforced concrete into the existing apron. A vertical sheetpile extends across the Project on the downstream edge of the spillway apron.

E.6.2.6 Tainter Gate

The tainter gate section is 20.5 feet, as measured from the left, as measured from the right side of Pier 1 (adjacent to the bascule section) to the right abutment wall. The tainter gate is 19.5-foot-wide by 11-foot-high. A wooden tainter gate was replaced in 2000 with a steel tainter gate. In 2017, the spillway section downstream from the tainter gate was overlaid by anchoring reinforced concrete into the existing section.

E.6.2.7 Right Embankment

The right embankment is 300-foot-long, as measured along the crest of the embankment, was constructed of earth-fill over rock-filled timber cribs with a 10-foot-wide embankment crest. The earthen embankment was raised to elevation 1184.84 feet NGVD, which included 1.3 feet of freeboard for long-term settlement, by constructing a sheetpile wall on the upstream side of the embankment and filling in behind the sheetpile with earth. The current crest elevation is at approximate elevation 1184 feet NGVD which is within the range of anticipated settlement, for a total for a total height of approximately 30 feet. The sheetpile wall, which is 30-feet deep, extends for 149 feet from its connection point with the tainter gate section and is anchored by concrete deadmen and steel tiebacks.

E.6.2.8 Tailrace Section

Ten flumes were originally constructed for power generation. Only five of the 10 flumes are currently used, with a sixth flume expected to be operational in the near future when the new turbine is installed. Below the draft tubes is a hard concrete floor. At the end of the concrete floor towards the downstream end of the tailrace, the floor transitions into timber planking.

E.6.2.9 Transmission Line

The Project transmission lines consist of a 236-foot-long 2.4-kV overhead transmission line running from the powerhouse to a pad-mounted transformer located on the left abutment, directly east of the powerhouse. Power is then transferred underground to the distribution grid. The transmission line length is shorter than stated in the existing license due to recent modifications. The 825-foot-long 34.5 kV underground transmission line transfers power from the pad-mounted transformer (owned by BPU) to the distribution grid. (refer to Figure A-4 in Appendix B).

E.6.3 Water Surface – 18 CFR § 5.18(b)(4)(iii)

The normal water surface area for the reservoir is 2,500 acres with a normal water surface elevation of 1174.0 ± 0.1 feet (NGVD). The storage capacity of the reservoir is 13,000 acre-feet.

E.6.4 Turbines and Generators – 18 CFR § 5.18(b)(4)(iv)

The Project is licensed for six generating units with a total installed capacity of 3,542.5 kilowatts [5]. Detailed information on each unit is provided in Table E-1. At present, five tandem horizontal turbines with direct connections to generators are installed. The license was amended in 2016 to allow for the additional capacity of a sixth turbine/generator unit, which has not been installed. With the proposed turbine, the Project will have a combined rated capacity of 3,542.5 kW. The installed capacity is currently

2,942.5 kW. The minimum and maximum hydraulic capacity for the units is 295 and 2,773 cfs (per installed unit), respectively. The hydraulic capacity range of the new turbine is expected to be 310 to 925 cfs.

Table E-1 Unit Summary

Unit No.	Year Generator / Turbine Installed	Authorized Installed Capacity (kW)	Generator Make and Type	Turbine Make and Type
1	1916	560 ⁽¹⁾	Electric Machinery 700 kVA 2300V (560 kW)	2-S. Morgan Smith 45 inch Horizontal Frances 128.5 rpm Type N 610 hp (455 kW) at 665 cfs
2	1916	560 ⁽¹⁾	Electric Machinery 700 kVA 2400V (560 kW)	2-S. Morgan Smith 45 inch Horizontal Frances 128.5 rpm Type N 610 hp (455 kW) at 665 cfs
3	1956/1916	480.3 ⁽¹⁾	General Electric 600 kVA 2300V (480.3 kW)	2-S. Morgan Smith 32.5 inch Horizontal Frances 225 rpm Type S 520 hp (388 kW) at 493 cfs
4	1956/1916	671.1 ⁽¹⁾	Electric Machinery 900 hp 2200V (671.1 kW)	2-S. Morgan Smith 32.5 inch Horizontal Frances 225 rpm Type S 520 hp (388 kW) at 493 cfs
5	1956/1916	671.1 ⁽¹⁾	Electric Machinery 900 hp, 2200V (671.1 kW)	2-S. Morgan Smith 32.5 inch Horizontal Frances 225 rpm Type S 520 hp (388 kW) at 493 cfs
6	Planned 2020/2021	600 ⁽²⁾ (assumed)	TBD	TBD

Total 2,942.5

(1) Based on BPU calculated capacity (6)

(2) ATS-63 Turbine/generator installation date TBD – (6)

E.6.5 Dependable Capacity – 18 CFR § 5.18(b)(4)(v)

The dependable capacity is estimated to be 2,200 kW. The average annual energy production is 19,500,000 kWh.

E.6.6 Operation – 18 CFR § 5.18(b)(4)(v)

The Project is manually operated as a run-of-river and maintains a target elevation of 1174.04 feet (NGVD), with fluctuations limited to 0.1 feet [6]. The Project is not used for peaking, and does not have ramping rates, flushing flows, or flood control operations. Run-of-river mode may be temporarily modified in the event of an emergency if the Minnesota Department of Natural Resources (MNDNR) agrees, but FERC must be notified as soon as possible following the event. The addition of the sixth turbine involves no change to the dam or reservoir or to the existing operations of the present Project or its reservoir. The Project will remain run-of-river with inflow matching outflow. The only change is that

water will flow through the powerhouse via the sixth turbine instead of passing over the gated spillway section. There are no changes to operation proposed for the Project.

E.6.6.1 Plan of Operation

Operations for the Project follows a Plan of Operations originally developed in 1995. Aspects of this plan have been incorporated into the Project's Dam Safety Surveillance and Monitoring Program, last updated in December 2020, the Emergency Action Plan, last updated in January 2021, specifically related to monitoring, high flow procedures, and emergency conditions. The Plan of Operations requires coordination with the Minnesota Department of Natural Resources to request temporary modifications to the run-of-river operations (for emergency conditions only). Any temporary modification of the run-of-river operation is reported to the FERC. Coordination with other plant operators occurs during construction activities and emergency action planning but is not required for routine flow adjustments. BPU proposes to continue complying with Article 404 with no proposed changes to operations. Costs to continue executing the Plan of Operations are included in the costs to perform operations and maintenance to maintain the target reservoir elevation (Table A-8).

E.6.6.2 Reservoir Monitoring Procedures and Frequency

Headwater and tailwater levels are read and recorded hourly by plant operating personnel. Operators maintain both electronic and hard copy logs.

E.6.6.3 Reservoir Monitoring Equipment

Equipment used to monitor the reservoir to maintain a target surface elevation of 1174.04 feet (NGVD), with fluctuations limited to 0.1 feet [6] include:

- A mechanical water gage along with bubble tube and chart recorder used to measure headwater.
- A staff gage, located where the powerhouse connects to the slide gate section, used to measure headwater and is a verification for the mechanical gage.
- USGS gage (Gage No. 05242300) used to measure tailwater.

E.7 Proposed Action and Alternatives – 18 CFR § 5.18(b)(5)

E.7.1 Summary of Existing Measures

BPU currently implements the following protection, mitigation, and enhancement (PM&E) measures for the protection of aquatic, water quality, geologic/soil, recreation, and cultural resources pursuant to the existing license for the Project:

- **Article 402** requires that the Licensee operate the Project in a run-of-river mode, maintain a target elevation of 1174.04 feet NGVD, with fluctuations limited to 0.10 feet [12]. Run-of-river may be temporarily modified in the event of an emergency if the MNDNR agrees, but the FERC must be notified as soon as possible following the event.
- **Article 403** requires the Licensee to file and implement a plan to monitor the Project's run-of-river operation.

- **Article 404** requires the Licensee to file and implement an operation plan which specifies how the Licensee coordinates with other plant operators on the Mississippi River and considers effects of flow adjustments on downstream fishery and other natural resources.
- **Article 405** requires the Licensee to file and implement a plan to annually monitor bald eagle nesting at the Project.
- **Article 406** requires the licensee to implement the Programmatic Agreement executed on January 11, 1993, to avoid and mitigate impacts to archeological and historic sites at the Project.
- **Article 407** requires the Licensee to consult with the State Historical Preservation Office (SHPO) before conducting any land-clearing or ground-disturbing activities within the Project boundaries or if a previously unidentified archaeological or historic property is discovered during the course of Project operation. In either instance, the Licensee must file the following with the Commission: a report containing a cultural resources survey, a cultural resource management plan completed by a qualified cultural resource specialist after consulting with the SHPO, and SHPO and Tribal written comments. The Licensee shall implement the plan upon Commission approval.
- **Article 408** requires the Licensee to monitor recreation use in the Project area to determine if existing recreation facilities are meeting recreation needs. Monitoring studies shall occur annually and every 6 years. The Licensee shall file a report containing the monitoring results with FERC. This report shall include annual recreation use figures, a discussion of whether the facilities are adequate to meet recreation demand, a description of the methodology used to collect study data, if there is a need for additional recreation facilities in the Project area, documentation of agency consultation, and comments on the report and specific descriptions of how the agency's comments are accommodated.

E.7.2 Applicant's Proposal

The comprehensive studies, consultation, and evaluation of the Project during the previous licensing resulted in the development and implementation of multiple comprehensive PM&E measures; therefore, the Applicant is proposing measures consistent with the measures required by the existing license with some modifications. The Applicant proposes to:

- Maintaining a target reservoir elevation of 1174.04 feet NGVD with fluctuations limited to 0.1 feet.
- Operating and maintaining the current FERC-approved recreation facility owned by BPU.
- Developing a Recreation Management Plan and file with the FERC within one year of the new license issuance date.
- Developing a Cultural Resources Management Plan (CRMP) and file with the FERC within one year of the new license issuance date.

E.8 Environmental Analysis – 18 CFR § 5.18(b)(5)(ii)

The effects of the Project on environmental resources is explained in this section utilizing the information filed in the PAD, information developed through implementation of the FERC-approved study plans, and additional information otherwise developed or obtained by the Licensee.

E.8.1 Geology and Soils

E.8.1.1 Affected Environment

E.8.1.1.1 Geology

The Project is located in the Mississippi River Valley near the headwaters of the Mississippi. In this region, the Mississippi River flows through ice-contact stratified materials and outwash sand deposited during the Wisconsin glaciation. Bedrock is Precambrian metamorphic rocks such as argillite (slate), greywacke, and ferruginous chert (Exhibit E-5 Figure 1 in Appendix C). The bedrock surface is generally at a depth of less than 100 feet and occasionally outcrops near the surface. Soils in the area of the dam are predominantly outwash sands, ice-contact stratified materials, and Glacial Lake Brainerd deposits less than 100 feet deep [10] (Exhibit E-5 Figure 2 in Appendix C). Sinkholes are generally associated with carbonate bedrock such as dolomite and limestone. Since the bedrock at the dam site is Precambrian metamorphic rock, sinkhole potential is negligible [10].

A northeast-trending thrust fault is located approximately ½ mile southeast of the dam [19]. It should be noted that there is no history of significant earthquakes in this region. Minnesota is considered to be a low-risk seismic region as referenced in USACE publication ER 1110-2-1806 [20].

E.8.1.1.2 Soils

According to the Soil Survey of Crow Wing County [21], there are 24 soil map units found within the Project Area. The most predominant soil map unit is water (84 percent of the Project area) because the Project Area primarily consists of the reservoir upstream of the Brainerd Dam. Other soil map units that comprise more than 1 percent of the Project area include:

- Eutrudepts-Graycalm-Rollins complex, pitted, 20 to 45 percent slopes (5 percent of the Project area).
- Lougee-Totagatic-Bowstring complex, 0 to 1 percent slopes, frequently flooded (3 percent of the Project area).

All soils mapped in the Project Area have a soil erodibility factor (K_f ¹) less than 0.37, making them less susceptible to sheet and rill erosion by water. Most of the mapped soils in the Project Area (88 percent) are classified as non-hydric, and none of the mapped soils are classified as prime farmland. See Figure 3 Exhibit E-5 in Appendix C for surficial soils in the Project Area.

¹ The K_f erosion factor indicates the erodibility of materials less than 2 millimeters in size. Values of K range from 0.02 to 0.69, with higher values indicating greater susceptibility.

E.8.1.1.3 Topography

The topography in the vicinity of the Project is relatively level with some areas of strongly rolling hills. The highest ground elevation within 2 miles of the Project is about 165 feet above normal reservoir headwater elevation. From its upstream origin, the Mississippi River follows an extremely winding course, which flows through a broad, flat highland covered with numerous lakes, swamps, and low hills. There is only a 70-foot vertical drop between the Blandin Dam (located in Grand Rapids) and the Project site in Brainerd. The Blandin Dam is the next upstream dam along the main stem of the Mississippi River, approximately 173 river miles away [12].

E.8.1.1.4 Reservoir Shoreline and Streambank Conditions

The shoreline surrounding the Project is forested. The streambanks are relatively stable. The Project is operated as run-of-river with a 0.1-foot variation. Sudden increases or decreases in reservoir elevation are due to weather conditions and not Project operations. Therefore, the Project is likely to have limited effect on erosion.

E.8.1.2 Environmental Analysis

The FERC did not identify geologic and soils resource issues in Scoping Document 2 (SD2). There were no studies proposed or completed during the relicensing regarding geology and soils. While Project operations do not directly cause erosion, the dam will continue to serve as a physical barrier that traps sediment. Because the license renewal perpetuates current conditions, it is anticipated that continued Project operation will not result in any new impacts to geology, topography, and soils.

E.8.1.3 Proposed Environmental Measures

BPU proposes continued Project operations with PM&E measures consistent with those required by the existing license, including limiting reservoir fluctuations to 0.1 feet.

E.8.1.4 Unavoidable Adverse Effects

Unavoidable adverse effects are those effects that may still occur after implementation of PM&E measures. Continued operation of the Project as a run-of-river facility is not expected to have unavoidable adverse impacts on geology or soil resources.

E.8.2 Water Resources

E.8.2.1 Affected Environment

E.8.2.1.1 Drainage Area

The Mississippi River arises in an area of small lakes in northwestern Minnesota and flows southeast across the state to its confluence with the Minnesota River near St. Paul, Minnesota. The Project is part of the Upper Mississippi River basin, which is predominantly forest. The drainage area of the Upper Mississippi River Basin is approximately 7,320 square miles. The watershed is described as a glaciated region having gravelly and sandy outwash material [12].

E.8.2.1.2 Flows of Record

Historical flood data for this Project is gathered from the USGS gaging stations at Aitkin (52 miles upstream of Brainerd) and Royalton (48 miles downstream from Brainerd). A USGS gage was installed at Brainerd in 1987. Average monthly flow data from the Brainerd gage is shown for the last 10 years in Table E-2. The minimum, maximum, and average discharge for the gages are shown in Table E-3. The annual and monthly flow duration curves for the Project are in Exhibit A-2 in Appendix A. The minimum, mean, and maximum daily flows from the Brainerd gage for the period of record are 348 cfs, 3,488 cfs, and 17,900 cfs, respectively.

Table E-2 Average Monthly Flows for USGS Gage 052452300 (2009-2019)

Year	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
2009	1,652	2,129	4,339	8,987	6,508	3,539	1,690	991	618	1,179	3,079	2,072
2010	2,212	2,050	3,013	1,656	2,501	1,652	2,167	2,769	2,503	3,735	6,925	3,714
2011	3,338	3,068	3,086	7,385	8,468	6,217	4,854	3,525	1,647	1,411	1,650	1,590
2012	1,400	1,338	1,839	2,970	6,209	12,540	11,590	3,535	1,170	885	1,195	2,044
2013	1,716	1,717	1,687	4,495	9,139	7,481	4,885	1,522	1,017	2,242	2,520	1,969
2014	2,116	2,120	2,264	7,093	10,900	10,010	5,952	3,685	3,506	3,018	2,619	2,020
2015	1,791	1,646	1,831	1,370	5,176	4,798	2,667	1,727	2,253	2,149	4,209	4,415
2016	3,669	3,196	5,252	5,795	4,462	3,477	8,002	4,047	3,522	3,436	3,215	4,864
2017	3,541	3,611	5,008	6,977	7,770	3,387	1,992	2,041	3,055	5,638	3,336	2,903
2018	1,956	1,647	1,680	3,113	4,629	6,540	7,050	2,458	2,903	5,896	5,027	3,267
2019	2,604	2,187	3,252	9,904	9,386	4,484	4,826	2,866	3,400	8,157	7,028	4,375
Monthly Mean ⁽¹⁾	2,475	2,290	2,739	5,677	6,014	4,727	4,234	2,382	2,166	2,983	3,350	2,851

(1) Monthly mean based on data from May 1987 to December 2017

Table E-3 USGS Stream Gage Data

Gage	Drainage Area (mi ²)	Period of Record	Minimum Discharge (cfs)	Mean Discharge (cfs)	Maximum Discharge (cfs)
05227500 at Aitkin	6,140	1945 to 2017	153 (Sept. 1, 1961)	2,929	19,900 (May 20, 1950)
05242300 at Brainerd	7,320	1987 to 2017	348 (July 30, 1988)	3,488	17,900 (June 26, 2012)
05267000 near Royalton	11,600	1924 to 2017	254 (Nov. 25, 1937)	4,912	38,200 (April 8, 1997)

E.8.2.1.3 Water Uses and Upstream and Downstream Requirements

The primary purpose of the Project is electrical power generation. The Project is operated in a run-of-river mode year-round with inflow matching outflow. The reservoir elevation is maintained at 1174.0 ± 0.1 feet (NGVD) for flows less than 13,000 cfs. When flows exceed 13,000 cfs, the Project is no longer capable of regulating the reservoir elevation because at that flow the gates are fully open.

The Applicant is not aware of any upstream water intakes within the boundary limits of the Project. BPU proposes they continue operating the Project in a run-of-river mode year-round, with inflow matching outflow. If there are existing water intakes located upstream from the Project, continued operation of the Project is not anticipated to impact to those intakes because the Applicant proposes to continue regulating the reservoir at a minimum elevation of 1174.0 ± 0.1 feet (NGVD).

Because the Project operates in a run-of-river mode year-round and the Applicant proposes to continue operating the Project in a run-of-river mode, it is not anticipated that the continued operation of the Project will change impacts to water elevations or flows downstream from the Project.

E.8.2.1.4 Existing Instream Flow Uses

The MNDNR and the Minnesota Pollution Control Agency (MPCA) regulate the use of surface waters within the state's boundaries. Primary water uses include recreation, such as boating and fishing, and hydroelectric power generation. Secondary uses include navigation and industrial process cooling water.

Because the Project operates in a run-of-river mode year-round and the Applicant proposes to continue operating in a run-of-river mode, it is not anticipated that continued operation of the Project will change impacts to instream flows.

E.8.2.1.5 Water Rights

The Project is located in Minnesota following eastern (Riparian) water law [22]. Since the Project operates as a run-of-river facility, a water use permit is not required.

E.8.2.1.6 Relevant Federally Approved Water Quality Standards

Under Section 303(d) of the Clean Water Act (CWA), states are required to monitor and assess their waters to determine if they meet water quality standards supporting the beneficial use they are intended to provide (33 U.S.C. 1313(d)). Waters that do not meet their designated uses due to water quality standard violations, are listed as impaired. States are required to develop a list of impaired waters that require total maximum daily load (TMDL) studies and submit an updated list of impaired waters to the U.S. Environmental Protection Agency (USEPA) every 2 years. The MPCA monitors waters to determine if they meet water quality standards for designated uses and lists waters as impaired they exceed water quality standards for their designated uses.

Within the Project Area, Rice Lake (ID 18-0145-00) and the reach of the Mississippi River from the Pine River to the Crow Wing River (ID 07010104-656), which extends both upstream and downstream of the Brainerd Dam, are on MPCA's impaired waters list. Rice Lake is impaired for mercury in fish tissue, with the affected designated use of aquatic consumption. Rice Lake was first listed as impaired in 1998, and a TMDL Plan for mercury impairment was approved in 2008. Similarly, the reach of the Mississippi River was first listed as impaired for mercury in fish tissue in 1998, with the affected designated use of aquatic consumption. A TMDL Plan for the Mississippi River impairment was approved in 2007. This reach of the Mississippi River was also listed as impaired for total suspended solids (TSS) in 2016, with the affected

designated use being aquatic life. A TMDL Plan for the TSS impairment has not been completed, but is targeted for completion in 2021 [23].

Pursuant to 18 CFR §5.18(b)(3)(i), applicants must file a request for a Section 401 water quality certification. A Section 401 water quality certification was issued to BPU during Project relicensing in 1993. When BPU applied for a non-capacity amendment in 2016, the MPCA believed that the original Section 401 water quality certification for the Project remained in effect, because there were no significant structural changes, no change to the dam or reservoir, and no changes to the existing operation of the Project (as noted in MPCA's March 18, 2016 letter to BPU). This response from the MPCA was submitted to the FERC in a letter dated March 21, 2016 (Exhibit E-2 in Appendix C).

In August 2020, the MPCA stated that their March 18, 2016 letter was the most current correspondence on the matter and confirmed that the original Section 401 water quality certification remains in effect. This determination was contingent on BPU relicensing only its existing facilities, with no significant structural changes, no change to the dam or reservoir, and no changes to the existing operation of the Project. Consultation with the MPCA will continue through the licensing process.

E.8.2.1.7 Project Effects on Seasonal Variation of Water Quality

The Project waters are subject to Minnesota Rules, chapter 7050, Waters of the State, Water Quality Standards for Protection of Waters of the State. Mississippi River water in the vicinity of the Project is in the water use group classifications 2B and 3B.

- Class 2B: Fisheries and recreation. The quality of this class of waters of the State shall be such as to permit the propagation and maintenance of a healthy community of cool or warm water aquatic biota and their habitats. These waters shall be suitable for aquatic recreation of all kinds, including bathing for which the waters may be usable.
- Class 3B: Industrial Consumption. The quality of this class of the waters of the State shall be such as to permit their use for general industrial purposes, except for food processing with only a moderate degree of treatment.

In addition, this reach of the river from Lake Itasca to Fort Ripley is designated as an outstanding resource value water. This means that these waters have special qualities that warrant stringent protection from pollution. The only established water quality monitoring station in this reach of the river is near Royalton, 48 miles below the Project. In 2017, the MPCA assessed water quality from the headwaters to the Twin Cities area. Although the portions of the river up and downstream of the Project met recreation standards for water quality, the portion of the river upstream from Grand Rapids to Brainerd failed to meet river live standards due to sediment levels [24].

Each year the Minnesota Department of Health publishes a fish consumption advisory for Minnesota waterways for the presence of mercury, dioxin, and PCBs. The June 2016 publication [25] lists mercury advisories for a variety of fish species caught in the Mississippi River in the vicinity of the Project, both up and downstream.

The state of Minnesota has issued a Water Quality Certificate to the Applicant, which requires a minimum flow below the dam of 380 cfs, except when limited by reservoir inflow. This conforms to the USEPA's recommendations on minimum flows for maintaining water quality below the dam.

E.8.2.1.8 Existing Reservoir Information

The reservoir elevation is 1174.0 ± 0.1 feet (NGVD). The reservoir has a normal surface area of about 2,500 acres or storage capacity of 13,000 acre-feet. The minimum Project outflow is 380 cfs, except when the inflow is less than 380 cfs, in which case outflow equals inflow. The Project is a run-of-river facility.

E.8.2.2 Environmental Analysis

A dissolved oxygen (DO) and temperature study was conducted by the Applicant to evaluate the DO concentration and temperature of water entering the Project's powerhouse intakes within the reservoir and the DO concentration and temperature of water discharged immediately downstream of the powerhouse into the Mississippi River during summer conditions. DO and water temperature were identified as the water quality monitoring variables of interest because these variables are effective indicators for overall health of the aquatic system, as fish and other organisms require DO and temperature within certain ranges. The report was submitted to the FERC with the Initial Study Report (ISR) on January 22, 2020 and is in Exhibit E-6 in Appendix C.

The objectives and summary results from the DO and Temperature Study [26] were:

- Objective: Identify the DO concentration and temperature of water entering the Project intakes.

Results: DO concentration at the upstream monitoring location ranged from 5.22 to 8.90 mg/L, with a seasonal mean of 7.16 mg/L. Water temperature at the upstream monitoring location ranged from 13.8° to 26.1°C, with a seasonal mean of 21.0°C.

- Objective: Describe any temporal variations of DO concentration and temperature.

Result: DO concentrations do not vary dramatically between upstream and downstream locations.

- Objective: Identify the DO and temperature profile within the Project reservoir, in the vicinity of the intakes.

Results: DO concentrations are highest in early summer and fall, and lowest mid-summer. Water temperature does not vary significantly throughout the reservoir in the summer season.

- Describe the changes of DO concentrations and temperature in the river downstream of the Project.

Results: DO concentration and water temperature do not vary dramatically with water depth, either upstream or downstream.

Four monitoring locations were utilized for this study; one upstream and three downstream locations. The upstream location is located immediately upstream of the Project intake, at the intersection of the slide gates and the powerhouse, within 33 feet of the intakes. The downstream locations are located 150 feet (Site 1), 300 feet (Site 2), and 450 feet (Site 3) downstream of the Project.

During data collection, information on water condition (odor, color, contents, etc.), hydrology, and Project operations (spillway and generator flow) was also collected. Although this study was not designed to model the variables associated with DO and temperature, the inclusion of these supplemental variables may provide context to DO and water temperature results.

In addition to the target variables of DO and temperature, field staff also recorded qualitative observations on the condition and contents of water, such as surficial foam, algal blooms, fish kills, odors, color, organic sheen, etc. This information was collected to provide context to the dataset, and to potentially explain any low DO concentrations.

DO measurements were collected at each of the four monitoring locations as both concentrations (mg/L) and saturations (% Sat). Figure E-4 shows the average DO concentrations at each monitoring location over the course of the Study. Figure E-5 shows the average DO saturation at each monitoring location over the course of the Study. For both figures, average values were obtained by calculating the mean value for the profile data collected at each monitoring location. Figure E-6 shows the average water temperature at each monitoring location over the course of the Study. Average values were obtained by calculating the mean value for the profile at each monitoring location.

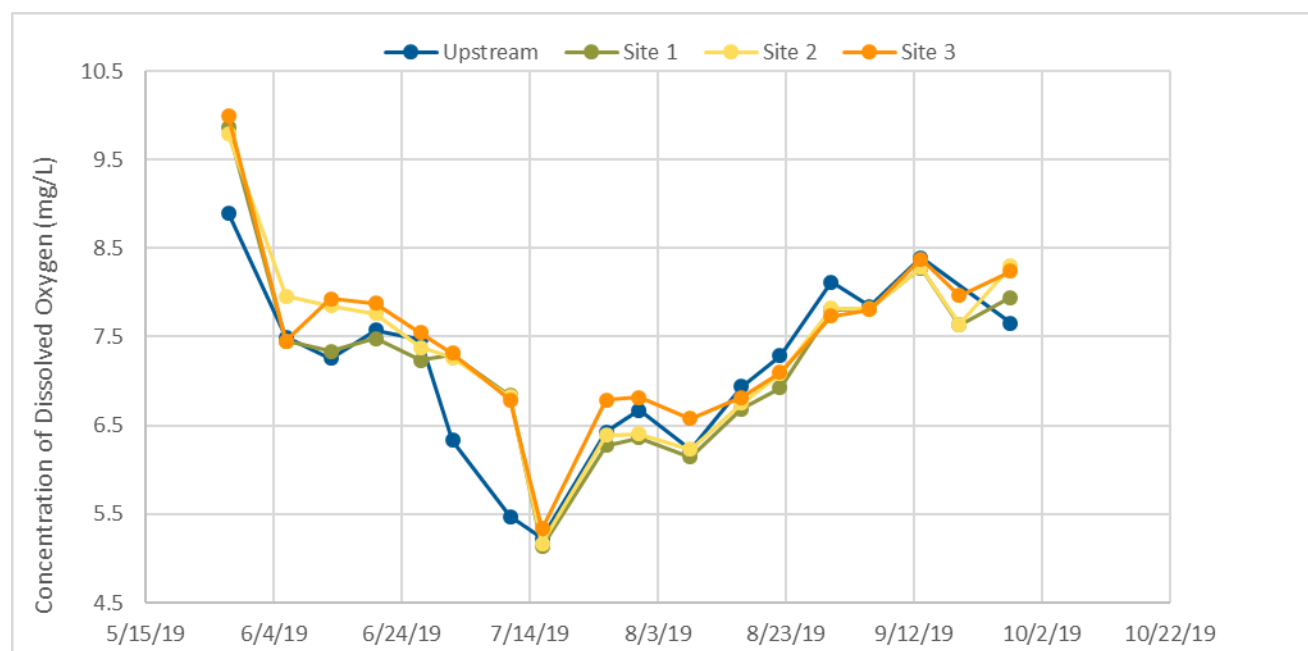


Figure E-4 Average DO Concentrations

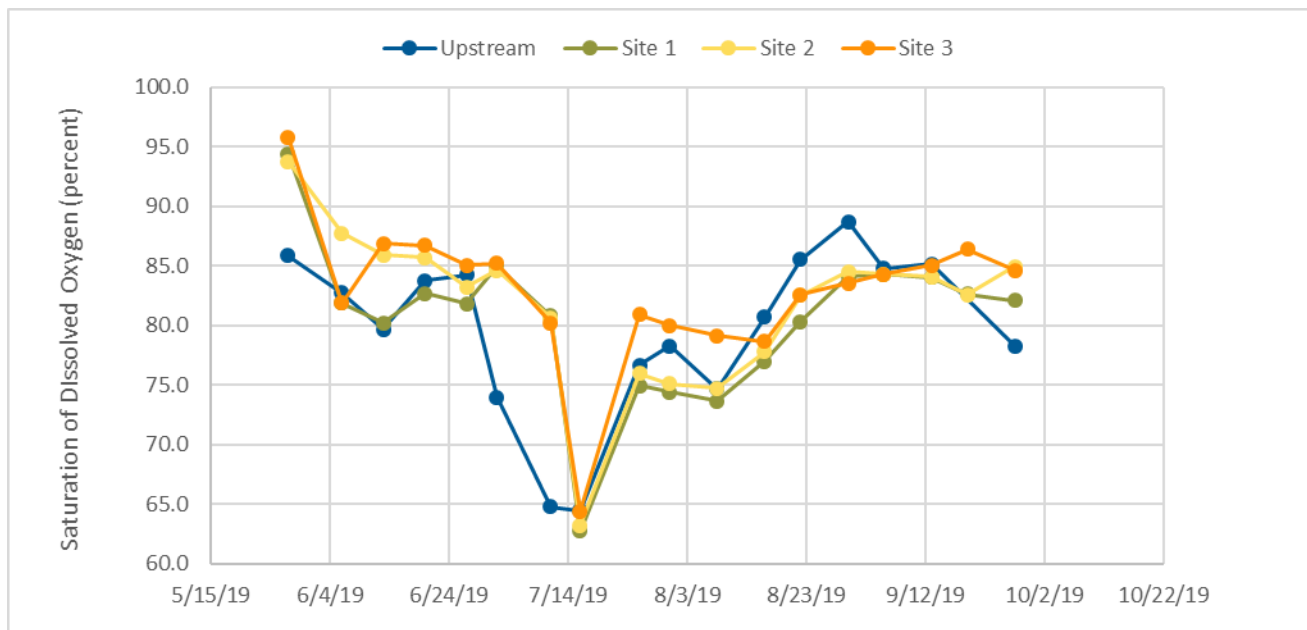


Figure E-5 Average DO Saturation

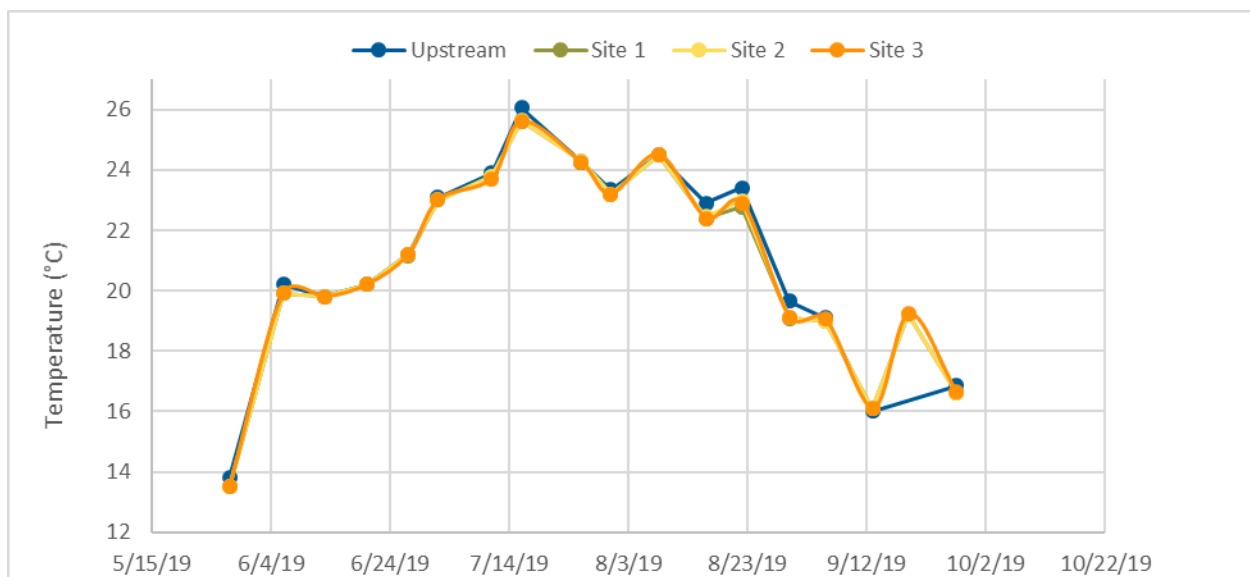


Figure E-6 Average Temperature

The monitoring data indicate the following about the water entering the Project intakes:

- DO concentration at the upstream monitoring location ranged from 5.22 to 8.90 mg/L, with a seasonal mean of 7.16 mg/L.
- DO saturation at the upstream monitoring location ranged from 64.3- to 88.9-percent saturation, with a seasonal mean of 79.6-percent saturation.

- Water temperature at the upstream monitoring location ranged from 13.8 to 26.1°C, with a seasonal mean of 21.0°C.

The monitoring data indicate the following about temporal variation in DO concentration and water temperature.

- DO concentrations recorded during the study tended to be greatest in late May. DO concentrations generally decreased until mid-July, when DO values were lowest, then increased to early-season levels. DO saturation values also followed a very similar seasonal pattern, and vary inversely with water temperature.
- Water temperatures were lowest early in the growing season, peaked around mid-July, and then generally decreased for the rest of the season.
- Patterns of seasonal variability and the inverse relationship between DO and temperature were not unexpected. Microvariations from week to week were also not unexpected, because the monitoring was conducted on a weekly basis, instead of daily or hourly.
- The monitoring was completed on a weekly basis; therefore, this study can only identify DO and temperature variations that occur on a corresponding weekly basis. Because more frequent monitoring was not conducted, this study cannot show variations that occur on an hourly or daily basis.
- The monitoring was completed over an 18-week period, between June 1 and September 30. Therefore, the study cannot describe variations that occur outside of this time frame.
- Profile data from the upstream monitoring location suggests that DO and temperature in the reservoir do not vary dramatically with depth. The differences between the upper and lower measurements within the profile are less than 0.2 mg/L for DO concentration, less than 2% Saturation for DO, and less than 0.5 °C for water temperature. These data suggest that the water in the reservoir is well-mixed immediately prior to entering the Project intakes for the duration of the summer season.

A comparison of surficial data between the downstream monitoring locations (Site 1, Site 2, and Site 3), suggest the following:

- DO concentrations in the water downstream of the Project generally increase with distance downriver, but only slightly. In general, the increase in DO concentration from Site 1 to Site 3 is less than 0.5 mg/L. This trend persisted with depth in the profile and was also present for the duration of the study.
- DO saturation in the water downstream of the Project does not appear to vary consistently with distance downriver. In general, the variability of DO saturation from Site 1 to Site 3 is less than 10 % Sat. This trend persisted with depth in the profile and was also present for the duration of the study.

- Temperature in the water downstream of the Project does not appear to vary consistently with distance downriver. In general, the variability of DO saturation from Site 1 to Site 3 is less than 1° C. This trend persisted with depth in the profile and was also present for the duration of the Study.

E.8.2.3 Proposed Environmental Measures

With the license renewal, no new impacts to water resources are expected. No changes to operations are proposed that would affect the availability or quantity of water in the Project area for other water users, wildlife, landowners, or recreationists. There are no PM&E measures planned for this resource.

E.8.2.4 Unavoidable Adverse Effects

Unavoidable adverse effects are those effects that may still occur after implementation of PM&E measures. The DO and temperature data are very similar between upstream and downstream locations, which suggests that the facility does not have any adverse effects on the reservoir water quality. No new impacts to water resources are expected from continued Project operation.

E.8.3 Fish and Aquatic Resources

E.8.3.1 Affected Environment

E.8.3.1.1 Existing Environment

The Brainerd area provides premier fish habitat. In addition to the Mississippi River, Rice Lake is immediately upstream and provides important fisheries habitat near the Project. Rice Lake is an impoundment of the Mississippi River created by the Brainerd Dam. As such, it contains both typical lake and riverine fish species [27].

The MNDNR surveyed the Rice Lake fishery in August 2014 and sampled 17 fish species, including black crappie, bluegill, bowfin (dogfish), brown bullhead, channel catfish, greater redhorse, hybrid sunfish, largemouth bass, northern pike, pumpkinseed, rock bass, shorthead redhorse, silver redhorse, smallmouth bass, walleye, yellow bullhead, and yellow perch [28].

The MNDNR stocks muskellunge in the Mississippi River, and although no muskellunge were sampled during the survey, there are reports of this fish species being caught in both Rice Lake and the adjoining reach of the Mississippi River. The MNDNR also stocks walleye in this region. Smallmouth bass is the primary management species of fish in Rice Lake, while walleye, northern pike, and muskellunge are secondary management species [27].

The MNDNR's Minnesota Statewide Mussel Survey indicates that the nearest mussel survey site is located approximately 6 miles upstream of the Project on the Mississippi River. The site (ID 2007059) was surveyed in June 2007, during which four species were identified: paper floater, fatmucket, giant floater, and plain pocketbook. According to the MNDNR, each of these is a common mussel species and the population is presumed to be healthy.

BPU operates the Project in run-of-river mode for the protection of fish and wildlife resources in the Mississippi River, meaning that water is discharged at approximately the same rate as it enters the reservoir. The elevation of the upstream reservoir is held within 0.1 feet to the extent possible. Flows into the Project area are managed by USACE-controlled reservoirs upstream of the Project.

Zebra mussels have been identified at the Project during inspections and sediment sampling activities. The most recent underwater inspection noted heavy marine growth zebra mussels on the upstream face of the spillway and trashrack but did not quantify the zebra mussels further. Sediment sampling taken on the downstream side of the project with a 6-inch by 6-inch dredge noted that zebra mussels were collected.

E.8.3.2 Environmental Analysis

A desktop fish entrainment and impingement study was completed to evaluate the potential for fish entrainment and impingement at the Project and its potential effects on the health of the upper Mississippi River fishery. The report was submitted to the FERC with the Initial Study Report (ISR) on January 22, 2020 and is in Exhibit E-7 in Appendix C.

Using a desktop analysis approach, it is estimated that approximately 290,000 fish less than 200 mm long are entrained at the Project annually. Of that, approximately 36,000 will suffer mortality from entrainment. It was estimated that approximately 5,600 – 200 to 380 mm fish become entrained, and of those, approximately 1,200 suffer mortality. These estimations are based on species lists and relative composition data from the Mississippi River between Brainerd and the Grand Rapids Dam, entrainment data from the Electrical Power Research Institute database, and the Project's operational specifications.

Physical exclusion is expected to occur for some larger fish of all species except Common Shiner, Mimic Shiner, Spottfin Shiner, Johnny Darter, Logperch, Trout-perch, and Central Mudminnow. Consequently, impingement on the trashrack is not expected to occur for any of the target species that reach a length at which they would be too large to pass through the 1.75-inch clear bar spacing.

Based on our evaluation and sampling by the MNDNR, population dynamics in the reach would remain as is and the status quo of Muskellunge and other game species, both above and below the Project, would be maintained. Black Crappie were estimated to have the highest entrainment and mortality rates for both size classes. The projected survival rate for all units combined at the Project is 82.6%.

E.8.3.3 Proposed Environmental Measures

Because the license renewal essentially perpetuates current conditions, the Project is not anticipated to result in any new impacts to fish and aquatic resources. There are no PM&E measures planned for this resource.

E.8.3.4 Unavoidable Adverse Effects

The desktop study demonstrated the Project will likely impinge and entrain some fishes with associated mortality; however, no changes to the status quo of the fish populations above or below the Project are anticipated.

E.8.4 Botanical Resources

E.8.4.1 Affected Environment

Publicly available data sources and available previous surveys in the vicinity of the Project were used to develop information related to wildlife and botanical resources, and are shown on Exhibit E-5 Figure 4 in Appendix C.

Noxious weeds were discussed in the *Botanical Resources Memo* (Exhibit E-8 Appendix C), specifically that purple loosestrife, common tansy, and reed canary grass has been observed. The location of common tansy and discussion of observations of reed canary grass was provided in the memo. The *Botanical Resources Memo* notes that the Minnesota Department of Agriculture's Noxious Weed Mapper identified purple loosestrife occurrences in 2007/2008. The locations of these occurrences were near the Brainerd Airport and along Highway 20 near Bluejay Trail or at least 800-feet away from the Project Boundary. In a recent search of the MN Department of Agriculture's noxious weed mapper (July 2021), there are no records of purple loosestrife in the database within the Project Area and reed canary grass is not tracked.

E.8.4.2 Environmental Analysis

In response to questions posed during the licensing process, a memorandum was developed describing the botanical resources in more detail. This memorandum is in Exhibit E-8 Appendix C and the information summarized herein.

The Project is located within the Northern Minnesota Drift and Lake Plains (MDL) Section of Minnesota's Laurentian Mixed Forest Province [29]. Vegetation patterns in the MDL reflect the area's history of patchy distribution of glacial deposits. Mesic forests typically consisting of sugar maple, basswood, paper birch, aspen, and northern red oak are widespread across the MDL. Historically, forests of jack pine and red pine were common. Sand and gravel deposits found atop moraines in the MDL provide suitable growing conditions for mixed forests of pine and boreal hardwood species, such as quaking aspen and paper birch. The eastern portion of the MDL, where the Project is situated, contains former lake plains with expansive areas of peatland communities, such as black spruce, as well as both poor and rich swamp forests with white cedar and black ash. Sedge meadows and alder swamps occur in riparian areas along the Mississippi River and other smaller streams.

The Project is located in a hybrid urban/rural setting; as such, existing vegetation has become altered from native conditions in many locations. Much of the vegetation in the Project area has been converted to impervious surface, maintained open spaces (i.e., lawns, parks, etc.), or secondary growth forest. There are no MNDNR-identified native plant communities in the Project area. One Minnesota Biological Survey (MBS) site overlaps the majority of the Project Boundary. This site, the Mississippi Moraine, is classified as a site of high biodiversity significance. MBS sites classified as high significance contain good quality occurrences of the rarest species, high-quality examples of rare native plant communities, and/or important functional landscapes. The MBS site classification for the Project area is shown on Exhibit E-5 Figure 4 in Appendix C.

E.8.4.3 Proposed Environmental Measures

Because the license renewal essentially perpetuates current conditions, the Project is not anticipated to result in any new impacts to botanical resources. There are no PM&E measures planned for this resource.

E.8.4.4 Unavoidable Adverse Effects

It is expected that continued Project operation will not cause new impacts to botanical resources.

E.8.5 Wildlife Resources

E.8.5.1 Affected Environment

Publicly available data sources and available previous surveys in the vicinity of the Project were used to develop information related to wildlife and botanical resources, and are shown on Exhibit E-5 Figure 4 in Appendix C.

The area surrounding the Project contains suitable habitat for a variety of wildlife, such as whitetail deer, wild turkey, coyote, red fox, rodents, rabbits, and raccoons. The Project is located in the Mississippi Flyway 5 of North America [30]. As such, migratory birds, including waterfowl, may use the surrounding area as resting grounds during spring and fall migrations, as well as breeding and nesting grounds throughout the summer.

Bald eagle surveys within the Project Boundary have been ongoing since the 1993 license. Monitoring completed by the MNDNR in 2014, identified two bald eagle nests within the upper portion of the Project area—one active and one inactive. The active nest was located in the vicinity of a previously observed, known nest location. The inactive nest was located in a tree that had typically supported an active nest since bald eagle surveys were initiated in the early 1990s.

There are no Waterfowl Production Areas (WPA), State Wildlife Refuges, or State Wildlife Management Areas (WMA) within the Project boundaries. The nearest State Wildlife Refuge is the Camp Ripley Statutory Game Refuge, located approximately 10 miles southwest (downstream) of the Project area. The nearest WMA is Loerch, located approximately 1.6 miles southeast (downstream) of the Project area.

E.8.5.2 Environmental Analysis

In SD2, the FERC did not identify wildlife resource issues. There were no studies proposed or completed during the relicensing regarding wildlife resource issues. Because the license renewal perpetuates current conditions, it is anticipated that continued Project operation will not result in any new impacts to wildlife.

E.8.5.3 Proposed Environmental Measures

Because the license renewal essentially perpetuates current conditions, the Project is not anticipated to result in any new impacts to botanical resources. BPU proposes removing the bald eagle monitoring as a PM&E measure, due to the change in status for bald eagles. There are no PM&E measures planned for this resource.

E.8.5.4 Unavoidable Adverse Effects

It is expected that continued Project operation will not cause new impacts to wildlife resources.

E.8.6 Wetlands, Riparian, and Littoral Habitat

E.8.6.1 Affected Environment

Wetland, riparian, and littoral habitats within the Project area are primarily associated with margins and near-shore areas of the dam's impoundment. According to the U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI), the majority of the Project area is classified as lake (approximately 1,872 acres, comprising 93 percent of the Project area [Exhibit E-5 Figure 5 in Appendix C]), which typically contains water depths too deep to support wetlands. There are 144 wetland acres identified by the USFWS NWI in the Project area, and freshwater emergent (approximately 115 acres, comprising 80 percent of wetland in the Project area), freshwater pond (approximately 19 acres, comprising 13 percent of wetland in the Project area), and freshwater forested/shrub and riverine wetland types (less than 10 percent) [31] are the predominant wetland classifications.

Wetlands in Minnesota can be further categorized into types based on the Circular 39 system developed by the USFWS. Based on the Circular 39 system, wetlands in the Project area are primarily Type 3—shallow marsh, Type 4—deep marsh, Type 5—open water, and Type 8—bogs [32]. Each of these wetland types is further characterized below:

- **Type 3—Shallow Marsh:** Soils of Type 3 wetlands are usually waterlogged in early spring and are often covered with six or more inches of water. Vegetation typically includes grasses, bulrushes, spikerushes, cattails, arrowheads, pickerelweed, and smartweed. Type 3 wetlands protect water quality and shoreland; retain floodwater; provide habitat for waterfowl, amphibians, and fish; and foster recreational opportunities, such as hunting, fishing, and canoeing.
- **Type 4—Deep Marsh:** Type 4 wetland soils are usually covered in 6 inches to 3 feet of water in spring and summer seasons. This type of wetland can completely fill shallow lake basins and depressions or may border littoral zones of open water areas. Type 4 wetland vegetation typically includes cattails, reeds, bulrushes, spikerushes, and occasionally wild rice. In open areas, pondweed, naiads, coontail, watermilfoils, waterweeds, duckweeds, waterlilies, or spatterdocks can be found. Type 4 wetlands provide water quality protection and floodwater detention while serving as habitat for wildlife and fisheries and providing recreational opportunities similar to those provided by Type 3 wetlands.
- **Type 5—Open Water:** Type 5 wetlands include shallow ponds and are littoral zones of reservoirs. Water in this type of wetland is typically less than six feet deep, fringed by a emergent vegetation boarder. Benefits of Type 5 wetlands include floodwater detention, fish and wildlife habitat, and opportunities for hunting, fishing, and canoeing.
- **Type 8 – Bog:** Type 8 wetlands primarily occur in northern portions of the state. Soils are usually waterlogged and covered in spongy moss. Typical bog-type wetland plants include heath shrubs, sphagnum moss, sedge, leatherleaf, laborador-tea, cranberries, and cottongrass. Black spruce and

tamarack can be found scattered throughout Type 8 wetlands, though their growth is often stunted by the conditions. Typical benefits of Type 8 wetlands include peat harvesting, water quality, low-flow augmentation, and shoreland protection.

E.8.6.2 Environmental Analysis

Further environmental analysis was not requested by the FERC or any other agency. There were no studies proposed or completed during relicensing regarding this resource. Because the license renewal perpetuates current conditions, it is anticipated that continued Project operation will not result in any new impacts to the resource.

E.8.6.3 Proposed Environmental Measures

The Project is located in a forested landscape; as such, the majority of riparian areas surrounding lake and wetland areas consist of deciduous forest with smaller amounts of coniferous forest and pastureland. Because the license renewal essentially perpetuates current conditions, it is anticipated that the Project will not result in any new impacts to wetlands, riparian, and littoral resources.

E.8.6.4 Unavoidable Adverse Effects

It is expected that continued Project operation will not cause new impacts to wetlands.

E.8.7 Rare, Threatened, and Endangered Species

E.8.7.1 Affected Environment

Federal and state of Minnesota laws establish designations for vegetation and wildlife threatened, endangered, and special concern species. The limited terrestrial habitat within the Project Boundary consists of a thin band of primarily deciduous riparian forest bordering the impoundment. Most of the upland habitat for terrestrial wildlife and vegetation species occurs outside the Project Boundary.

E.8.7.1.1 Federal Species Review

In accordance with Section 7 of the Endangered Species Act (ESA) of 1973, as amended, federal agencies are required to ensure the following two criteria:

1. Any action funded or carried out by such agency must not be likely to jeopardize the continued existence of any federally listed endangered or threatened species or species proposed to be listed.
2. No such action can result in the destruction or adverse modification of habitat of such species that is determined to be critical by the Secretary.

In accordance with Section 7, the Project area was evaluated to determine the potential presence of federally listed species. Since the license was issued in 1993, the bald eagle was delisted from the Endangered Species Act, although it still enjoys protection under the Bald and Golden Eagle Protection Act and Migratory Bird Treaty Act. An official list of ESA-designated species in the Project area was requested through the USFWS online Information, Planning, and Conservation System (IPaC) program on

February 14, 2018 (Exhibit E-9 in Appendix C). According to the IPaC results, there is no federally designated critical habitat in the Project area, but the following federally listed species may occur in the vicinity of the Project: gray wolf (*Canis lupus*—threatened) and northern long-eared bat (*Myotis septentrionalis*—threatened) [33].

The gray wolf occupies diverse habitats, including forests, prairies, and swamps. The non-reservoir portions of the Project area and immediate vicinity are largely undeveloped forested areas, which may provide suitable habitat for the gray wolf.

The northern long-eared bat roosts in living and dead trees greater than three inches in diameter that have loose or peeling bark, cavities, or crevices. During winter, the northern long-eared bat hibernates in caves and mines. The Project is located within the mapped white-nose syndrome zone for the species [34]. White-nose syndrome is an emergent disease in hibernating bats that causes extreme sickness and death. According to the USFWS and MNDNR Natural Heritage Inventory System (NHIS), there are no documented records of northern long-eared bats, roost trees, or hibernacula in the vicinity of the Project. The nearest known location is approximately 26 miles southwest (downstream) of the Project.

The removal of woody vegetation greater than 3 inches diameter at breast height may occur as a maintenance activity at the Project. This activity is proposed to occur on an annual basis if needed. In the event such tree removal is required, this activity will be limited to the dormant period for this species, November 1 – March 31. As a result, this activity will have no effect on the Northern Long-eared Bat. Removal of brush or other woody vegetation less than 3 inches diameter at breast height may occur during the active season, however this removal will not impact suitable habitat for this species and as a result will have no effect on the Northern Long-eared Bat.

E.8.7.1.2 State Species Review

State-listed species were reviewed using the MNDNR NHIS database (license agreement number LA-674, Barr Engineering Co.). One state-listed species was identified in the vicinity of the Project: Blanding's turtle (*Emydoidea blandingii*—threatened). In Minnesota, this species adapts to a variety of wetland and riverine habitats across the state. Its preferred habitat includes wetland complexes and adjacent sandy uplands suitable for nesting. Calm, shallow waters, including wetlands associated with rivers and streams with rich, aquatic vegetation, are especially preferred. Wetlands in the Project Area may contain suitable Blanding's turtle habitat.

The Blanding's turtle has been observed approximately 0.4 miles southwest of the Project Area. There are no recorded observations at the Project. Project maintenance activities are largely limited to the dam structure with limited mowing and brushing of the left abutment and right embankment areas. For this species nesting occurs in sparsely vegetated uplands with well-drained, sandy soils. No suitable nesting habitat occurs within the scope of the Project. Adult or juvenile turtles may travel through the area but are likely to avoid human activity.

E.8.7.2 Environmental Analysis

Further environmental analysis was not requested by the FERC or any other agency. There were no studies proposed or completed during relicensing regarding this resource. Because the license renewal perpetuates current conditions, it is anticipated that continued Project operation will not result in any new impacts to the resource

E.8.7.3 Proposed Environmental Measures

Given that license renewal essentially perpetuates current conditions, it is anticipated that the Project will not result in any new impacts to rare, threatened, endangered, and special status (RTE) species.

E.8.7.4 Unavoidable Adverse Effects

It is expected that continued Project operation will not cause new impacts to RTE.

E.8.8 Recreation and Land Use

E.8.8.1 Affected Environment

Land use within the Project area is primarily the open water reservoir upstream of the Brainerd Dam, followed by wetland and deciduous forest land uses. Land use near the Project is shown on Exhibit E-5 Figure 6 in Appendix C. Lands and waters in the vicinity of the Project provide a variety of recreational opportunities to area residents and visitors, including a state water trail, boat launches, state hiking trails, snowmobile trails, and public recreation areas. Recreation opportunities are shown on Exhibit E-5 Figure 7 in Appendix C.

The Mississippi River's Headwaters River Trail begins at the river's source and flows 420 miles downstream, including through the Project, ending on the Minnesota/Iowa border. The River Trail is divided into 10 mapped segments, two of which overlap the Project: the Palisade-to-Brainerd segment and the Brainerd-to-Little Falls segment. Neither of these segments have major rapids requiring experienced paddling skills. These segments of the River Trail are accessible to users of all skill levels. Though a reach of the Mississippi River has been designated as Wild and Scenic River, it is located well downstream of the Project area (extending from St. Cloud to Anoka).

There are two trailer-accessible public boat ramps within the Project area, including one at Lum Park on Rice Lake and one at French Rapids on the Mississippi River. Carry-in boat access is available at Green's Point. Lum Park and Green's Point both provide users with fishing pier access, while Lum Park also hosts a picnic area and access to potable water. A canoe portage and restrooms are located at the Project over the right embankment.

The Paul Bunyan State Trail is a 115-mile-long hiking trail located approximately 1.2 miles west of the Project, at the nearest point. It is the longest of Minnesota's state trails and the longest continuously paved rails-to-trails pathway in the United States. The trail is used for hiking, biking, inline-skating, and winter snowmobiling. The Paul Bunyan State Trail was inducted into the Rail-Trail Hall of Fame in 2011 based on scenic value, trailside amenities, and excellence in management and maintenance [35]. The French Rapids Trail is an approximately 5.9-mile long trail network that can be accessed from the French

Rapids access. The trail provides scenic views of the Mississippi River and, in the winter, is groomed for both classic and skate cross-country skiing. This trail is rated as an expert-level trail due to steep climbs and descents and is maintained by the Brainerd Nordic Ski Club for winter use. There is no lighting along the trail.

There are miles of groomed snowmobiling trails in the Project vicinity. The Brainerd Snodeos, a local snowmobiling club, maintains 107 miles of groomed trails in the region, including the Harding Trail located south and east of the Project. The Merrifield Marathon snowmobile club maintains the Merrifield Trail located north of the Project. Though both of these snowmobile trails are in the vicinity of the Project, neither overlap the Project Boundary.

The southern segment of the Cuyuna Country State Recreation Area (SRA) is located approximately 0.15 miles east of the upper portion of the Project area. Located atop an area of former mining pits and stockpiles, the Cuyuna Country SRA is one of Minnesota's newest SRAs. It consists of 5,000 acres of mostly undeveloped land and includes 25 miles of natural shoreline along small lakes [36]. The Cuyuna Country SRA contains 29 drive-in camp sites, 4 walk-in sites, one group camping site, and three rental yurts. Other recreational amenities include campground showers and flush toilets, vault toilets, potable water sources, carry-in boat access points, shore fishing areas, and trails for hiking and mountain biking [37].

E.8.8.2 Environmental Analysis

A recreation use and inventory study was conducted by BPU to assess site use and the condition of recreation sites and facilities within the Project Boundary. The report was submitted to the FERC with the Initial Study Report (ISR) on January 22, 2020 and has been included in Exhibit E10 in Appendix C of this DLA.

The objectives and summary of the results are listed below:

- Identify the condition of all informal and formal recreation sites and facilities wholly or partially within the Project Boundary.

Results: Condition ratings were determined following condition assessments of each site. The resulting ratings ranged from 3-4 (Table E-4).

- Determine current and projected capacity at each recreation site/facility.

Results: Surveyed users of the sites noted that three of the four sites were not very busy. Only Lum Park was noted as not very busy to moderately busy (Table E-4).

- Identify who owns, operates, and maintains each recreation site/facility.

Results: The entity that owns, operates, and maintains each recreation site/facility is identified in Table E-4.

- Conduct visitor surveys during the recreation season to determine the adequacy of Project recreation facilities and whether modifications or upgrades are needed to meet current or future recreation needs.

Table E-4 Summary of Results from Recreation Use and Inventory Planning Study

Recreation Site Name	Recreation Site Ownership/Maintenance	Condition Rating, 5-point Scale	Capacity	Recommendations
Canoe Portage	BPU	4 – Good	Not very busy	Routine maintenance
Lum Park	City of Brainerd	4 – Good	Not very busy to moderately busy	Routine maintenance
French Rapids Access	Crow Wing County	3 – Adequate	Not very busy	Maintain parking lot surface
Green's Point Access	MNDNR	3 – Adequate	Not very busy	Routine maintenance

E.8.8.3 Proposed Environmental Measures

Given that license renewal essentially perpetuates current conditions, it is anticipated that the Project will not result in any new impacts to recreational or land use. Maintaining water levels in the reservoir upstream from the Project helps maintain current recreational uses in Rice Lake and the Mississippi River. BPU will continue operating and maintaining their FERC-approved recreation facility. BPU proposes to develop a recreation management plan to be filed with the Commission within one year of the new license issuance date.

E.8.8.4 Unavoidable Adverse Effects

The Project provides a wide variety of recreation resources to the public that positively impact the region. No unavoidable adverse effects to recreation and land use have been identified.

E.8.9 Aesthetic Resources

E.8.9.1 Affected Environment

The Project is located within Brainerd city limits and the reservoir extends north of the city through a primarily forested, rural residential setting. A variety of land uses, land covers, and terrain conditions along the Mississippi River provide a high level of landscape diversity, enhancing the aesthetics of the Project area. As a structure, the Brainerd Dam contributes to the aesthetics of the surrounding area.

E.8.9.2 Environmental Analysis

Further environmental analysis was not requested by the FERC or any other agency. There were no studies proposed or completed during relicensing regarding this resource. Because the license renewal perpetuates current conditions, it is anticipated that continued Project operation will not result in any new impacts to the resource.

E.8.9.3 Proposed Environmental Measures

Given that license renewal essentially perpetuates current condition, it is anticipated that the Project will not result in any new impacts to aesthetic resources.

E.8.9.4 Unavoidable Adverse Effects

No unavoidable adverse effects to aesthetics have been identified.

E.8.10 Cultural Resources

E.8.10.1 Affected Environment

The Project is located in an area that was historically occupied by the Dakota (Sioux) Indians before the arrival of French explorers and fur trappers. Brainerd Township was founded in 1870 when the Northern Pacific survey determined the Mississippi River should be crossed in this location. The city of Brainerd was organized in 1873, and grew rapidly with the development of water power at a dam (now the Brainerd Dam) constructed across the Mississippi River in 1898 [3]).

Cultural resources inventories were completed in support of the initial FERC license in 1991. Phase I inventories were completed in 1989 and 1991 and included a literature and records search, followed by a complete reconnaissance survey along the reservoir shoreline. Nearly 70 locations with definite or apparent cultural evidence were identified. A Phase II National Register of Historic Places (NRHP) evaluation for cultural resources identified during the Phase I inventory was also completed in 1991. The Phase II evaluation included a more detailed assessment of Phase I-identified sites. A number of the sites were excluded from further study, either due to their location (well outside of the reservoir impact zone) or because there were in a highly disturbed setting with little potential for cultural significance. Thirty-four sites were considered NRHP-eligible (most were prehistoric archaeological sites), based on the Phase II evaluation [38].

The Brainerd Dam was also evaluated for NRHP eligibility in 1991. The dam itself was not eligible for the NRHP due to significant modifications to the original structure. The powerhouse was evaluated based on its original purpose, as a means to produce power for the paper mill. Two pocket grinders were found, located in their original positions, within the grinder room in the powerhouse. As a result, the grinder room was determined NRHP-eligible under Criterion C [39].

A Cultural Resources Management Plan (CRMP) has been developed for the Project. This requires the Licensee to inspect previously identified cultural resources for evidence of site-altering activity and to file reports describing the implementation of the CRMP every 3 years. Based on the 2017 Cultural Resources Monitoring inspection, four sites were recommended for further evaluation for mitigation due to potential erosion impacts.

E.8.10.2 Environmental Analysis

A study was conducted to determine the potential effects of Project operations on archaeological and historic resources within the area of potential effect (APE) that are included or eligible for listing on the National Register of Historic Places (NRHP). Phase II investigation activities completed include eight test

pits and three formal test units within the APE. This information was provided in the ISR in privileged correspondence with the appropriate resource agencies and Tribes. Additional correspondence related to this analysis has been included Appendix D.

E.8.10.3 Proposed Environmental Measures

Based on the location of several cultural resources sites in close proximity to the reservoir, continued Project operations may cause cultural resources impacts associated with perpetual erosion. The Applicant proposes developing and filing a Cultural Resources Management Plan (CRMP) with the FERC within one year of the new license issuance date.

E.8.10.4 Unavoidable Adverse Effects

It is expected that continued Project operation will not cause new impacts to cultural resources.

E.8.11 Socio-Economic Resources

E.8.11.1 Affected Environment

The Project is primarily located in a rural setting of northern Minnesota, in the city of Brainerd. Demographic information for the Project area and surrounding vicinity is summarized in Table E-5. Based on 2010 census data, nearly half of the population of the city of Brainerd is employed. Primary employment industries include educational services and healthcare (22%), retail trade (18%), and entertainment/recreation (16%). Similarly, nearly half of the population of Crow Wing County is employed. Primary employment industries in the county include educational services and healthcare (24%), retail trade (15%), and entertainment/recreation (12%). Within the Project area, 65% of the population is employed, presumably in industries similar to those that employ residents of the city of Brainerd.

Table E-5 Demographic Overview

Location	Population	Per-Capita Income	Population below Poverty Level	Minority Population	Predominant Race	Predominant Minority
Project Area ¹	2,443	\$22,907	Not listed	5%	White (95%)	Hispanic (2%)
City of Brainerd	13,590	\$18,948	21.8%	4%	White (96%)	American Indian (1%)
Crow Wing County	62,500	\$27,936	11.3%	3%	White (97%)	American Indian (1%)
Statewide	5,303,924	\$30,894	28%	12%	White (89%)	American Indian (5%)

(1) Analysis completed using the EPA's EJ Screen tool [40] and assessing a 0.25-mile buffer around the Project Boundary.

E.8.11.2 Environmental Analysis

Further environmental analysis was not requested by the FERC or any other agency. There were no studies proposed or completed during relicensing regarding this resource. Because the license renewal

perpetuates current conditions, it is anticipated that continued Project operation will not result in any new impacts to the resource

E.8.11.3 Proposed Environmental Measures

Given that license renewal essentially perpetuates current conditions, it is anticipated that the Project will not result in any new impacts to the socioeconomic conditions in the Project area and surrounding region.

E.8.11.4 Unavoidable Adverse Effects

No unavoidable adverse effects on socioeconomics were identified during the scoping process.

E.8.12 Tribal Resources

E.8.12.1 Affected Environment

In Minnesota, there are 11 recognized Native American tribes, including seven Chippewa (Ojibwe) communities and four Dakota (Sioux) communities. Chippewa (Ojibwe) communities in the state include Bois Forte, Fond du Lac, Grand Portage, Leech Lake, Mille Lacs, Red Lake, and White Earth. Dakota (Sioux) communities in the state include Prairie Island, Shakopee Mdewakanton, Lower Sioux, and Upper Sioux.

In addition to the eleven recognized Native American tribes in Minnesota, the FERC Initial Consultation Contact List for Minnesota identifies the Santee Sioux of Nebraska and Otoe-Missouria Tribe of Indians of Oklahoma as tribes that may also have an interest in Project licensing [41].

FERC distributed "Consultation with Tribes for the Brainerd Hydroelectric Project" letters on October 11, 2017. This letter was distributed to additional tribes beyond those identified above that may have an interest in the relicensing process, which were the Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin, Sokaogon Chippewa Community (Wisconsin), Bad River Band of Lake Superior Tribe of Chippewa Indian (Wisconsin), Lac du Flambeau Band of Lake Superior Indians of Wisconsin, Menominee Indian Tribe of Wisconsin, St. Croix Chippewa Indians of Wisconsin, Iowa Tribe of Kansas and Nebraska (Iowa), Keweenaw Bay Indian Community (Michigan), Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan, Fort Belknap Indian Community of the Fort Belknap Reservation of Montana, Apache Tribe of Oklahoma, and Cheyenne and Arapaho Tribes of Oklahoma.

There are no reservation lands within the Project Area, nor are there any known lands of ceremonial or religious significance or other traditional cultural properties within the Project Area.

E.8.12.2 Environmental Analysis

Further environmental analysis was not requested by the FERC or from any tribe. There were no studies proposed or completed during the relicensing regarding this resource. Because the license renewal perpetuates current conditions, it is anticipated that continued Project operation will not result in any new impacts to the resource

E.8.12.3 Proposed Environmental Measures

Given that license renewal essentially perpetuates current condition, it is anticipated that the Project will not result in any new impacts to Tribal resources.

E.8.12.4 Unavoidable Adverse Effects

There are no reservation lands within the Project Boundary or known lands of ceremonial or religious significance associated with the Project, and therefore the Project would not result in any unavoidable adverse effects to tribal resources.

E.9 Economic Analysis – 18 CFR § 5.18(b)(5)(ii)(E)

The Project is an existing, licensed facility. Annualized economic analysis for the Project including the cost of operating and maintaining the project under the existing license is provided in Table E-6. The Applicant estimates \$8,000 are spent annually to operate and maintain the on-site canoe portage, restrooms, and monitoring of those facilities.

Table E-6 Estimated Annual Project Cost

Description	Cost
Cost of Debt Capital - Interest	\$100,200
Local, State, and Federal Taxes	-
Depreciation and Amortization	\$328,200
Generation Expenses	
Personal Services	\$458,400
Operations and Maintenance	\$34,200
Employee Benefits	\$147,600
Licenses	\$32,400
Training	\$3,600
General and Administrative	
Personal Services	\$44,400
Operations and Maintenance	\$40,200
Property and Liability Insurance	\$62,400
Employee Benefits	\$20,400
Total Annual Costs	\$1,272,000

E.10 Consistency with Comprehensive Plans – 18 CFR § 5.18(b)(5)(F)

Section 10(a)(2) of the FPA, 16 U.S.C. section 803(a)(2)(A), requires the FERC to consider the extent to which a project is consistent with federal and state comprehensive plans for improving, developing, or conserving a waterway or waterways affected by a project. Under 18 CFR § 5.18(b)(5)(F) each license application must identify relevant comprehensive plans and explain how and why the proposed project would, would not, or should not comply with such plans. In addition, the license application must include a description or any relevant resource agency or Native American Tribe determination regarding the consistency of the project with any such comprehensive plan.

E.10.1 FERC-Approved State of Minnesota Comprehensive Plans

Minnesota Department of Natural Resources. 1983. Statewide outstanding rivers inventory. St. Paul, Minnesota. March 1983.

Minnesota Department of Natural Resources. 2015 (updated February 2019). Minnesota State Parks and Trails System Plan. St. Paul, Minnesota.

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Minnesota Department of Natural Resources. 2016. Minnesota's Wildlife Action Plan, 2015-2025. St. Paul, Minnesota. <https://files.dnr.state.mn.us/assistance/nrplanning/bigpicture/mnwap/wildlife-action-plan-2015-2025.pdf>

Minnesota Department of Natural Resources. n.d. Canoe and boating route program. St. Paul, Minnesota. 39 pamphlets.

Minnesota Department of Natural Resources. n.d. Minnesota's State Comprehensive Outdoor Recreation Plan (SCORP): 2014-2018. St. Paul, Minnesota.

https://files.dnr.state.mn.us/aboutdnr/reports/scorp_final_3308.pdf

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<https://files.dnr.state.mn.us/aboutdnr/reports/conservationagenda/ca-full.pdf>

E.10.2 FERC-Approved Federal Comprehensive Plans

National Park Service. The Nationwide Rivers Inventory. Department of the Interior, Washington, D.C. 1993. <https://www.nps.gov/subjects/rivers/nationwide-rivers-inventory.htm>

U.S. Fish and Wildlife Service. Canadian Wildlife Service. 1986. North American waterfowl management plan. Department of the Interior. Environment Canada. May 1986.

<https://www.fws.gov/migratorybirds/pdf/management/NAWMP/2012NAWMP.pdf>

E.10.3 Compliance with State and Federal Comprehensive Plans

The Project is an existing facility. There are no proposed measures that include the construction or alterations of the existing facilities. There are no proposed measures that change the operation of the Project. The Project has been operated as run-of-river since being constructed around 1918. Because the Projects has not changed, operation of the Project does not impact the comprehensive plans that are listed.

The key features of the Project that support goals listed in some of the comprehensive plans include:

- The Project include a canoe portage around the dam with restrooms. This recreational facility provides connected recreational access which is consistent with recreational goals listed in some comprehensive plans.
- The Project prevents the spread of invasive fish species by creating a barrier to invasive fish moving upstream on the Mississippi River. While river connectivity is typically desirable, there has been efforts made to prevent invasive species, such as Asian carp, from moving upstream of the Project into the Headwaters of the Mississippi River.

E.11 Consultation Documentation – 18 CFR § 5.18(b)(5)(ii)(G)

A list containing the name and address of every Federal, state, and interstate resource agency, Tribe, or member of the public with which the applicant consulted in preparation of the Environmental Documentation is included in the Distribution List in Exhibit E-11 in Appendix C.

E.12 Additional Documentation – 18 CFR § 5.18(b)(5)(iii)

E.12.1 Functional Design Drawings – 18 CFR § 5.18(b)(5)(iii)(A)

Functional design drawings are not applicable for this application because the application does not currently include nor are there proposals to include fish passage, collection facilities, or other facilities necessary for implementation of environmental measures.

E.12.2 Description of Operation and Maintenance Procedures for Existing or Proposed Measures or Facilities – 18 CFR § 5.18(b)(5)(iii)(B)

Operating and maintenance procedures for existing or proposed measures or facilities beyond that which is included in Section E.6 are not applicable for this application because there are no proposed changes to Project operations.

E.12.3 Implementation or Construction Schedule for Existing or Proposed Measures or Facilities – 18 CFR § 5.18(b)(5)(iii)(C)

An implementation or construction schedule for proposed measures or facilities are not applicable for this application because this application does not include construction of new or changes to existing facilities.

E.12.4 Estimate of Construction, Operation, and Maintenance Costs of Proposed Facilities, or Implementation of Proposed Environmental Measures – 18 CFR § 5.18(b)(5)(iii)(D)

An estimate of construction, operation, and maintenance costs for proposed measures or facilities are not applicable for this application because this application does not include construction of new or changes to existing facilities.

E.12.5 Map of Proposed Measures – 18 CFR § 5.18(b)(5)(iii)(E)

A map of proposed measures or facilities are not applicable for this application because this application does not include construction of new or changes to existing facilities.

E.13 Literature Cited – 18 CFR § 5.18(b)(5)(ii)(H)

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- [2] Act of Congress, *Chapter 49, adopted on April 15, 1886*, vol. 24, p. 12.
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- [18] National Oceanic and Atmospheric Administration, "Essential Fish Habitat Mapper," [Online]. Available: <https://www.fisheries.noaa.gov/resource/map/essential-fish-habitat-mapper>. [Accessed 08 09 2020].
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**DRAFT APPLICATION FOR LICENSE
FOR A MAJOR WATER POWER PROJECT – 5 MEGAWATTS OR LESS
EXISTING DAM**

**BRAINERD HYDROELECTRIC PROJECT
FERC PROJECT NO. 2533**

Exhibit F Project Operation and Resource Utilization

(Pursuant to 18 CFR §4.41(g))

F.1 Applicability

Exhibit F is required for this application. 18 CFR §5.18(a)(5)(i) defines the contents of the application license for a major water project 5 MW or less includes the general instructions, initial statement and Exhibits A, F, and G in accordance with 18 CFR §4.61, Exhibit E in accordance with 18 CFR §5.18(b), and Exhibit H in accordance with 18 CFR §5.18(h).

F.2 Exhibit F Drawings (18 CFR §4.41(g) and §5.18(f))

The general drawings showing overall plan views, elevation views, and section of the major project structures in sufficient detail to provide a full understanding of the Project are listed in Section F.3. The Exhibit F drawings are included in Appendix E.

F.3 Supporting Design Report (18 CFR §4.41(g)(3) and (4))

Pursuant to 18 CFR §4.41(g)(3) and (4), when filing for a new license, the applicant is required to submit two copies of a Supporting Design Report to the FERC to demonstrate that the existing structures are safe and adequate to fulfill their stated functions.

As an existing Project, it is subject to the requirements of 18 CFR Part 12 – Safety of Water Power Projects and Project Works, Subpart D – Inspection by an Independent Consultant. This program requires an inspection and review by an Independent Consultant (IC) every five years. During the review, the IC assesses the Potential Failure Modes Analysis (PFMA) and Supporting Technical Information Document (STID) developed for the project. The PFMA is a dam- and project-safety tool intended to broaden the safety evaluations scope to include potential failure scenarios that may have been overlooked in past investigations. The STID is a document prepared to capture the information necessary to have a complete and thorough understanding of the dam and analyses completed that support the findings regarding the safety of the structures.

The Project has been inspected by an independent consultant within the past five years and a PFMA and STID for the Project has been prepared and submitted to the FERC. Table F-1 provides the dates for which the most recent Part 12D Consultant Safety Inspection Report, PFMA Report, and STID were filled with the

Chicago Regional Office. Based on these filings, a Supporting Design Report is not included with this application.

Table F-1 List of Dam Safety Documents and Filing Dates

Document Name	Date
PFMA Report	September 2009, Updated 2018/2019
STID	June 2005, Updated December 31, 2020
Part 12D Consultant's Safety Inspection Report	November 30, 2018

**DRAFT APPLICATION FOR LICENSE
FOR A MAJOR WATER POWER PROJECT – 5 MEGAWATTS OR LESS
EXISTING DAM**

**BRAINERD HYDROELECTRIC PROJECT
FERC PROJECT NO. 2533**

Exhibit G Project Maps

(Pursuant to 18 CFR §4.41(h) and §5.18(f))

G.1 Applicability

Exhibit G is required for this application. 18 CFR §5.18(a)(5)(i) defines the contents of the application license for a major water project 5 MW or less, includes the general instructions, initial statement and Exhibits A, F, and G in accordance with 18 CFR §4.61, Exhibit E in accordance with 18 CFR §5.18(b), and Exhibit H in accordance with 18 CFR §5.18(h).

G.2 Project Maps

The Project Boundary maps were originally prepared in 1991 and show the Project vicinity, location, and boundary. These maps have been updated to include minor adjustments to the digitized Project boundary for more accurate GIS images, while maintaining the boundary that is two feet above the ordinary high-water mark. Detailed Project Boundary maps are in Appendix F.

**DRAFT APPLICATION FOR LICENSE
FOR A MAJOR WATER POWER PROJECT – 5 MEGAWATTS OR LESS
EXISTING DAM**

**BRAINERD HYDROELECTRIC PROJECT
FERC PROJECT NO. 2533**

Exhibit H Ability to Operate

(Pursuant to 18 CFR §5.18(c))

H.1 Applicability

Exhibit H is required for this application. 18 CFR §5.18(a)(5)(i) defines the contents of the application license for a major water project 5 MW or less includes the general instructions, initial statement and Exhibits A, F, and G in accordance with 18 CFR §4.61, Exhibit E in accordance with 18 CFR §5.18(b), and Exhibit H in accordance with 18 CFR §5.18(c).

H.2 Reliable Electrical Source – 18 CFR §5.18(c)(1)(i)(A)

Brainerd Public Utilities (BPU) operates and maintains the Project in a manner that provides efficient and reliable electric service by performing routine inspections and performing regular maintenance of the generation equipment.

H.2.1 Increase Capacity or Generation

There are no capacity or generation changes proposed for the Project.

H.2.2 Coordination with Other Projects

The Project is manually operated as a run-of-river and maintains a target elevation of 1174.04 feet (NGVD), with fluctuations limited to 0.1 feet [6]. During routine operation, coordination with other projects is not required for operation, but BPU coordinates with projects upstream and downstream from the Project for emergency preparedness.

H.2.3 Coordination of Operation with Electrical Systems

Power generated by the Project is transmitted through an underground electric line to a connection point with the distribution grid, all of which are owned and maintained by BPU. No additional coordination is required

H.3 Need for Project Power – 18 CFR §5.18(c)(1)(i)(B)

H.3.1 Cost and Availability of Alternative Sources of Power

The reasonable costs and availability of alternative power sources that would be needed by the Applicant if the Applicant is not granted a license for the Project is 20,000,000 kwh per year. Renewable power is available from the power produced at the Project.

H.3.2 Increase Cost to Replace Generation Power

If the applicant is not granted a license for the Project, there would be an increase in fuel, capital, and other costs to replace the licensed Project output, which would be incurred by the Applicant, to generate power, and its customers, to purchase power. Without the Project, the Applicant would need to purchase an additional 20,000,000 kwh per year equating to and additional \$875,000 annually in addition to the \$1,272,000 operations and maintenance costs that would still be required to maintain the high hazard facility.

H.3.3 Effect of Alternative Source of Power

BPU serves the city of Brainerd, Minnesota, portions of Baxter, Minnesota, and some customers outside the limits of Brainerd and Baxter. These communities, which have a combined population around 20,000 would incur the cost of the annual cost of \$2,147,000 to purchase the additional power and maintain the Project.

H.4 Alternative Sources of Power – 18 CFR §5.18(c)(1)(i)(C)

H.4.1 Average Annual Cost of Power

The estimated average annual cost of power produced from the Project is approximately \$33.00 per MWh computed based on actual generation and operating expenses. This is compared to a purchase price of \$43.75 per MWh based on contractual requirements.

H.4.2 Required Resources

The projected resources required to meet the capacity and energy requirements, over the short and long term.

H.4.2.1 Energy and Capacity Resources

The Project is the only energy resources owned by the Applicant. The remaining power demands are purchased from an external supplier.

H.4.2.2 Resource Analysis

The Project is the only energy resources owned by the Applicant providing a small portion of the power required for the Applicant's users. The remaining power demands are purchased from an external supplier. The external supplier maintains reserve margins to for energy and capacity.

H.4.2.3 Effects of Load Management Measures

Load management measures do not have an impact on the project capacity and energy requirements because the Project provides only a small portion of the total load requirements.

H.4.2.4 Resources for Alternate Power Sources

Without the Project, the Applicant would need to purchase an additional 20,000,000 kwh per year equating to and additional \$875,000 annually in addition to the \$1,272,000 operations and maintenance costs that would still be required to maintain the high hazard facility. These costs are computed based the cost to purchase the power produced by the Project and the operation and maintenance expense of the Project.

H.5 Use of Power for Applicant-Owned Industrial Facility – 18 CFR §5.18(c)(1)(i)(D)

BPU does not use the power generated at the Project to supply its own industrial facilities; therefore, this section is not applicable.

H.6 Tribe as Applicant – 18 CFR §5.18(c)(1)(i)(E)

BPU is not a Native American tribe; therefore, this section is not applicable.

H.7 Impacts of License on Transmission System – 18 CFR §5.18(c)(1)(i)(F)

H.7.1 Power Redistribution

If the Application does not receive the Project license, there will be stranded costs for approximately 400 feet of UG conductor. The transformer could be used at other locations. There are no impacts to the remainder of the power distribution grid system.

H.7.2 Single-Line Diagrams

A single-line diagram is provided in Exhibit A-5 in Appendix B.

H.8 Modifications – 18 CFR §5.18(c)(1)(i)(G)

BPU does not have plans to modify the Project; therefore, these sections are not applicable.

H.9 No Modifications – 18 CFR §5.18(c)(1)(i) (H)

The primary beneficial use of the project is to provide renewable power to BPU's customers. The Project has been modified in the past to include a portage to enhance recreation along this portion of the Mississippi River. The waters downstream from the Project are heavily used for recreation, specifically for fishing. The Project provides a barrier to river connectivity. This barrier prevents aquatic invasive fish from moving upstream and potentially impacting the Headwaters of the Mississippi.

H.10 Financial and Personnel Resources – 18 CFR §5.18(c)(1)(i)(I)

BPU has adequate resources to employ the personnel, or hire contractors, to safely maintain and operate the facilities. BPU is dedicated to operating the Project in a safe and reliable manner to provide clean, renewable electric energy to the electricity grid. As demonstrated under the existing license, BPU has the financial resources to meet the operations, maintenance, and capital requirements of the Project. BPU has employed the staff required to operate and maintain the facility.

H.11 Expansion of Lands – 18 CFR §5.18(c)(1)(i)(J)

BPU does not anticipate the need to propose expanding the Project boundaries; therefore, this section is not applicable.

H.12 Electricity Consumption Efficiency – 18 CFR §5.18(c)(1)(i)(K)

BPU's electricity consumption efficiency improvement program includes both a residential and commercial conservation incentive program (CIP) meeting the applicable regulatory requirements. The residential CIP includes rebates for Energy Star appliances and a fluorescent bulb recycling program. These programs are advertised in newsletters and on bills that go out to BPU's customers. The commercial CIP includes energy audits and assessments.

H.13 Affected Indian Tribes – 18 CFR §5.18(c)(1)(i)(L)

The Project is not located on Native American lands. BPU and the FERC consulted with Native American tribes that may be affected by the Project throughout the relicensing process and in support of cultural resources studies. Contact information associated with each of these Native American Tribes is presented in this application's Initial Statement and the associated distribution list in Exhibit E-11 in Appendix C

H.14 Project Safety – 18 CFR § 5.18(c)(1)(ii)(B)

H.14.1 Operation During Flood Conditions – 18 CFR § 5.18(c)(1)(ii)(B)(1)

The existing and planned Project operation during flood conditions is provided in the Emergency Action Plan (EAP), which is filed with the Commission. Specific actions that will be taken at the facility are in Table H-1.

Table H-1 High Flow Procedure

Action	Flow	Water Level (NGVD)
Install No. 2 Generator Pit Plug	5,100 cfs	TW 1163.5
Install all Pit Plugs	8,000 cfs	TW 1166.0
Install ballast at No. 1 & No. 2	13,400 cfs	TW 1169.5
Install flood door at lower door	13,400 cfs	TW 1169.5
Activate High Flow EAP	16,000 cfs	TW 1171.0
Install ballast at No. 3, No. 4, No. 5	16,000 cfs	TW 1171.0
Add ballast to No. 1 & No. 2	20,400 cfs	HW 1185.0
Sand bag door to raw water pumps	20,400 cfs	HW 1185.0
Install stop logs in roadway	20,400 cfs	HW 1185.0

H.14.2 Warning Devices – 18 CFR § 5.18(c)(1)(ii)(B)(2)

BPU maintains public safety measures at the Project for public safety upstream, in the vicinity of, and downstream of the Project pursuant to the Commission-approved Public Safety Plan. The public safety warning devices include an audible alarm, signage in multiple locations, seasonal upstream boat barriers, as well as measures consistent with the Project's Public Safety Plan. The Public Safety Plan is filed with the FERC.

H.14.3 Changes Impacting the EAP – 18 CFR § 5.18(c)(1)(ii)(B)(3)

There are no changes proposed to Project operations or downstream development that might affect the existing EAP; therefore, this section is not applicable.

H.14.4 Surveillance and Monitoring – 18 CFR § 5.18(c)(1)(ii)(B)(4)

BPU maintains and monitors the Project in accordance with industry practices and as described in the Dam Safety Surveillance and Monitoring Plan (DSSMP) that was prepared and is on file with the FERC Division of Dam Safety and Inspections – Chicago Office. As described in the DSSMP, Project surveillance and monitoring consists of visual observation, settlement monitoring, alignment monitoring, crack monitoring, sounding surveys and dive inspections, and headwater and tailwater level monitoring.

H.14.5 Employee and Public Safety – 18 CFR § 5.18(c)(1)(ii)(B)(5)

BPU manages the Project consistent with its long-standing commitment to employee safety, which is in compliance with applicable local regulations. BPU has zero lost time injuries at the Project since purchasing the Project in 2014.

H.15 Current Operation – 18 CFR § 5.18(c)(1)(ii)(C)

The Project is manually operated as a run-of-river and maintains a target elevation of 1174.04 feet (NGVD) with fluctuations limited to 0.1 feet consistent with the requirements of the current license [6]. There are no constraints that affect Project operation.

H.16 Project History – 18 CFR § 5.18(c)(1)(ii)(D)

As discussion of the history of the Project and record of programs to upgrade the operations and maintenance of the Project is included in Table H-2.

Table H-2 Project History

Date	Summary
1888	The original rock-filled timber crib dam was constructed. It is also assumed that a powerhouse was constructed at this time, although no documentation exists to support this. [42]
1916-1917	The dam was reconstructed and the powerhouse replaced. The original turbines were installed along with generators for Unit No. 1 and No. 2 [42]
1936	Generator No. 3 and No. 4 were installed [42]
1940	Generator No. 5 was installed [42]
1950-1951	Dam reconstruction following failure of the wooden dam gates. The work generally included: Constructing a sheetpile cofferdam system upstream from the existing concrete dam [43]. Consolidating timber sections that remained after the failure to elevations shown on B401-C-20 and filling the voids between timbers with Prepakt concrete. Constructing new concrete piers and a new concrete spillway for the bascule and slide gate sections. Installing new bascule and slide gates.
1996-1997	Repairs to the log sluice, Generator No. 2 forebay wall, and stop log gate repairs included: Consolidation grouting at the downstream end of the east pier crib between the log sluice (now the tainter gate section) and the bascule gate. Grout bags were added at this time. Grouting of two sinkholes in the right embankment. Reinforcement of the east timber strut for the tainter gate. Concrete repairs to the west wall of the forebay and slide gate piers. Void filled on the upstream face of the slide gate section along the entire extents.
1997	Concrete repairs to the structural supports at the hydro plant
2000	Flood control upgrades and timber tainter gate replacement including: Right embankment raised. Right abutment sheetpile wall with tiebacks. Wooden tainter gate replaced with a steel tainter gate. Stoplog closure added to left abutment. Steel walkway added over tainter gate section. For record drawings, refer to the referenced final construction report.
2007	Remediation of tailwater seepage on right embankment
2010-2011	Subsidence along the powerhouse road downstream of the powerhouse and at the entry slab to the powerhouse were remediated.
2011	Three small sinkholes were discovered and were subsequently excavated and backfilled with pit-run sand. During excavation, quarry rock and small amounts of timber were excavated from the area of the sinkhole. There was no evidence of any void area observed during excavation nor signs of running water. The conclusion was that the sinkhole and subsidence was the settlement of the ground in void areas between the rocks along with void areas created by deteriorating timber.
2013	Riprap scour protection placed along the upstream slope of the right embankment and downstream from the spillway apron within the river. For record drawings, refer to the referenced final construction report.

Date	Summary
2014-2015	Spillway apron modifications and interim repairs resulting in removal of concrete on the spillway apron, replacement of concrete on a section of the east spillway and placement of 7 chute blocks. For record drawings, refer to the referenced final construction report.
2015-2016	A physical model study was performed to improve understanding of the complex hydraulics of the Brainerd dam spillway, develop spillway design modifications that reduce long-term deterioration of the spillway apron, downstream score of the river channel, and evaluate the potential of undermining the downstream apron due to local scour.
2016	Performed concrete coring on the spillway apron to better understand seepage below the apron to inform the spillway apron overlay design.
2016-2019	Minor concrete work, installation of a sluice gate, and installation of the new turbine in Bay 6.
2017	Design report for the spillway apron overlay project. This report summarizes the results from the physical modeling, plan view seepage, and documents the spillway apron overlay design.
2017	Spillway apron overlay construction project resulting in a concrete overlay on the main spillway and tainter gate aprons as well as a concrete cap over the downstream sheetpile. During the project, concrete coring were taken documenting the condition of the material below the apron. For record drawings, refer to the referenced final construction report.
2020	Installation of sheetpile extension on left abutment

H.16.1 Lost Generation – 18 CFR § 5.18(c)(1)(ii)(E)

There have been no unscheduled outages for the Project greater than 1 day (or more than a slow-down) over the past five years.

H.16.2 Record of Compliance – 18 CFR § 5.18(c)(1)(ii)(F)

BPU received one letter of noncompliance, which was resolved when BPU filed the DSSMR report on March 17, 2017 [44].

- February 27, 2017 – Letter of noncompliance for failure to file Dam Safety Surveillance and Monitoring Report (DSSMR) for calendar year 2015 by April 2016 [45]

H.16.3 Actions by Licensee – 18 CFR § 5.18(c)(1)(ii)(G)

BPU believes their actions are favorable to the public in that the Project provides clean, renewable electric energy, as well as non-power benefits associated with the Project, such as the canoe portage. In addition, the Project provides power diversification for the residents, which helps reduce utility costs. BPU believes that past actions and future actions related to the Project will not adversely affect the public.

H.16.4 Expenses due to License Transfer – 18 CFR § 5.18(c)(1)(ii)(H)

There is no proposal or application to transfer the Project license from the existing Licensee; therefore, this section is not applicable.

H.16.5 Fees Paid for use of Federal or Indian Lands – 18 CFR § 5.18(c)(1)(ii)(I)

There are no federal or Native American lands associated with the Project. BPU does not pay annual fees under Part 1 of the Federal Power Act (FPA); therefore, this section is not applicable.

H.17 Consistency with Comprehensive Plans – 18 CFR § 5.18(d)

Comprehensive plans are listed in Section E.10 of this application. The Project is an existing facility. There are no proposed measures that include the construction or alterations of the existing facilities. There are no proposed measures that change the operation of the Project. The Project has been operated as run-of-river since being constructed around 1918. Because the Projects has not changed, operation of the Project does not impact the comprehensive plans that are listed.

The key features of the Project that support goals listed in some of the comprehensive plans include:

- The Project include a canoe portage around the dam with restrooms. This recreational facility provides connected recreational access which is consistent with recreational goals listed in some comprehensive plans.
- The Project prevents the spread of invasive fish species by creating a barrier to invasive fish moving upstream on the Mississippi River. While river connectivity is typically desirable, there has been efforts made to prevent invasive species, such as Asian carp, from moving upstream of the Project into the Headwaters of the Mississippi River.

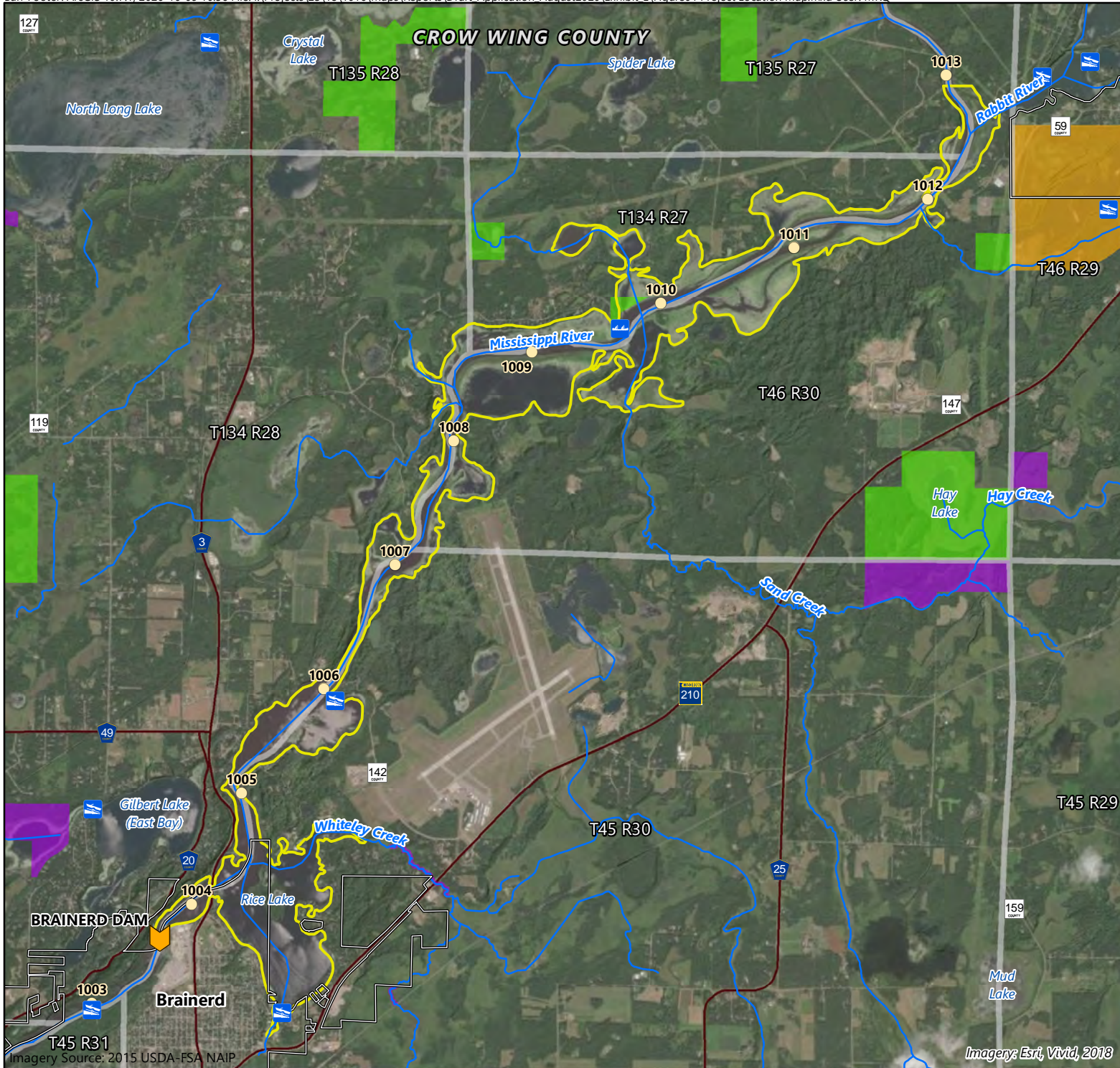
H.18 Response to Information Requests – 18 CFR § 5.18(e)

Responses to information requests have been provided throughout the relicensing process. Those response were incorporated relicensing documentation. There were no comment submitted on the Draft License Application.

Appendix A

Exhibit A - Project Description Attachments (Public)

- Project Map (Exhibit A-1)
 - Flow Duration Curves (Exhibit A-2)
 - Principal Project Features (Exhibit A-3)
-



- Carry-in/Portage
 - Trailer Launch
 - River Mile Marker
 - Dam Location
 - Major Highway
 - Project Boundary
 - Corporate Limits
 - PLSS Township
- Protected Areas**
- State Trust Land
 - State Fish and Wildlife
 - State Park and Recreation

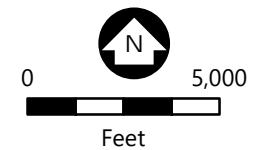


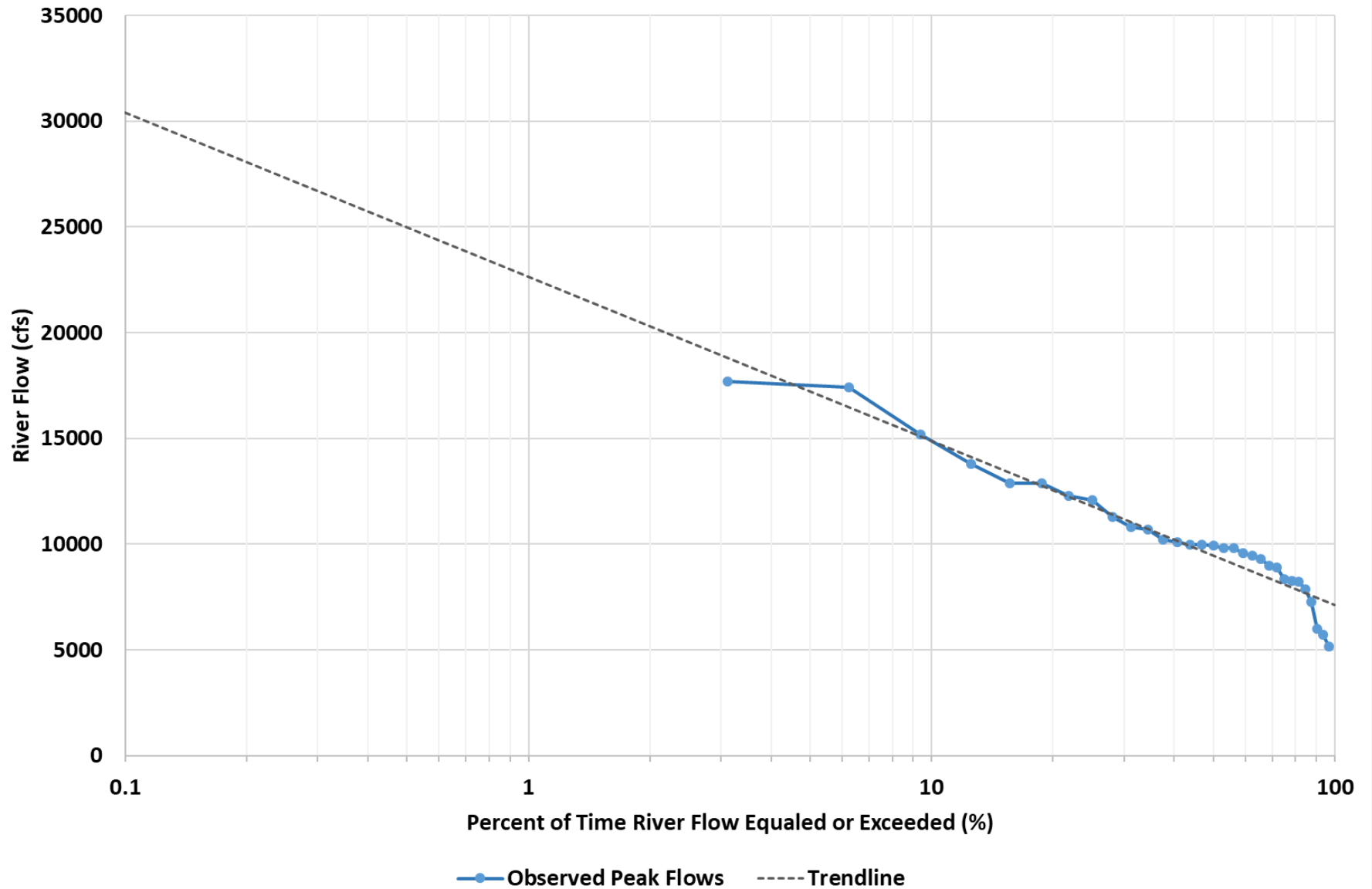
Exhibit A-1

PROJECT LOCATION
Brainerd Dam
Brainerd Public Utilities

Mississippi River-Brainerd USGS Gage 05242300

Annual Flow Duration Curve

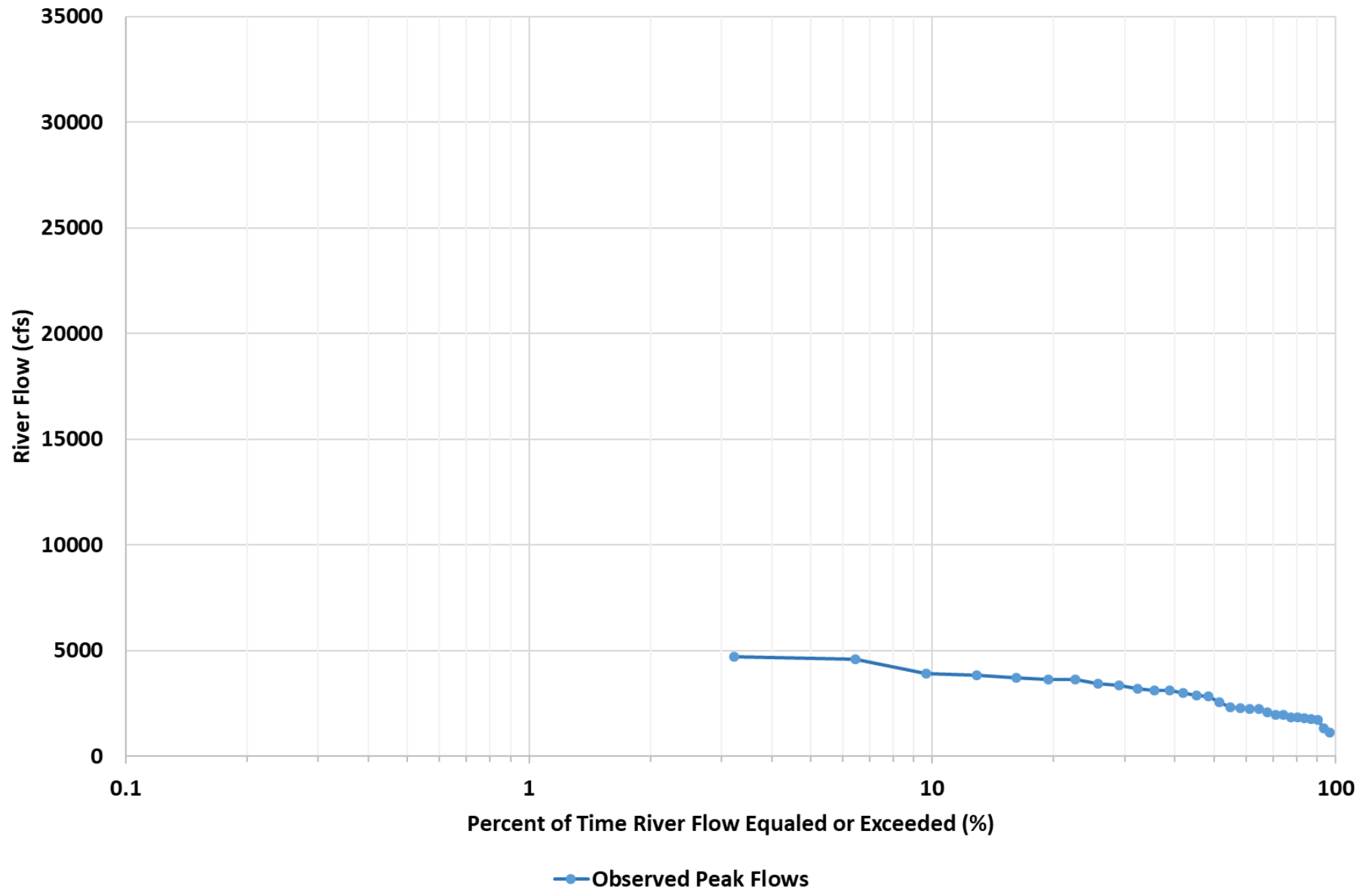
Period of Record: 1987 to 2017



Mississippi River-Brainerd USGS Gage 05242300

January Flow Duration Curve

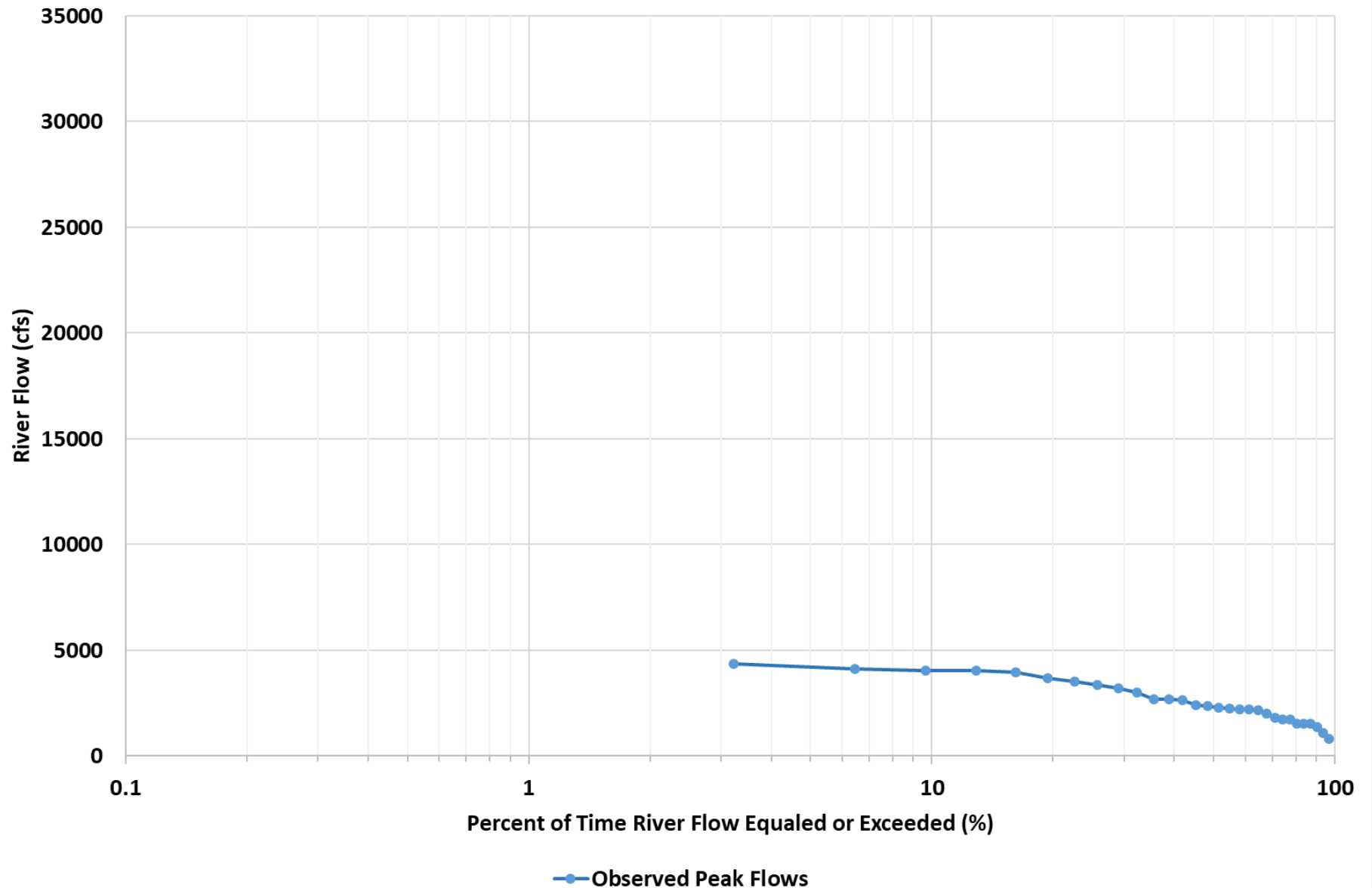
Period of Record: 1987 to 2017



Mississippi River-Brainerd USGS Gage 05242300

February Flow Duration Curve

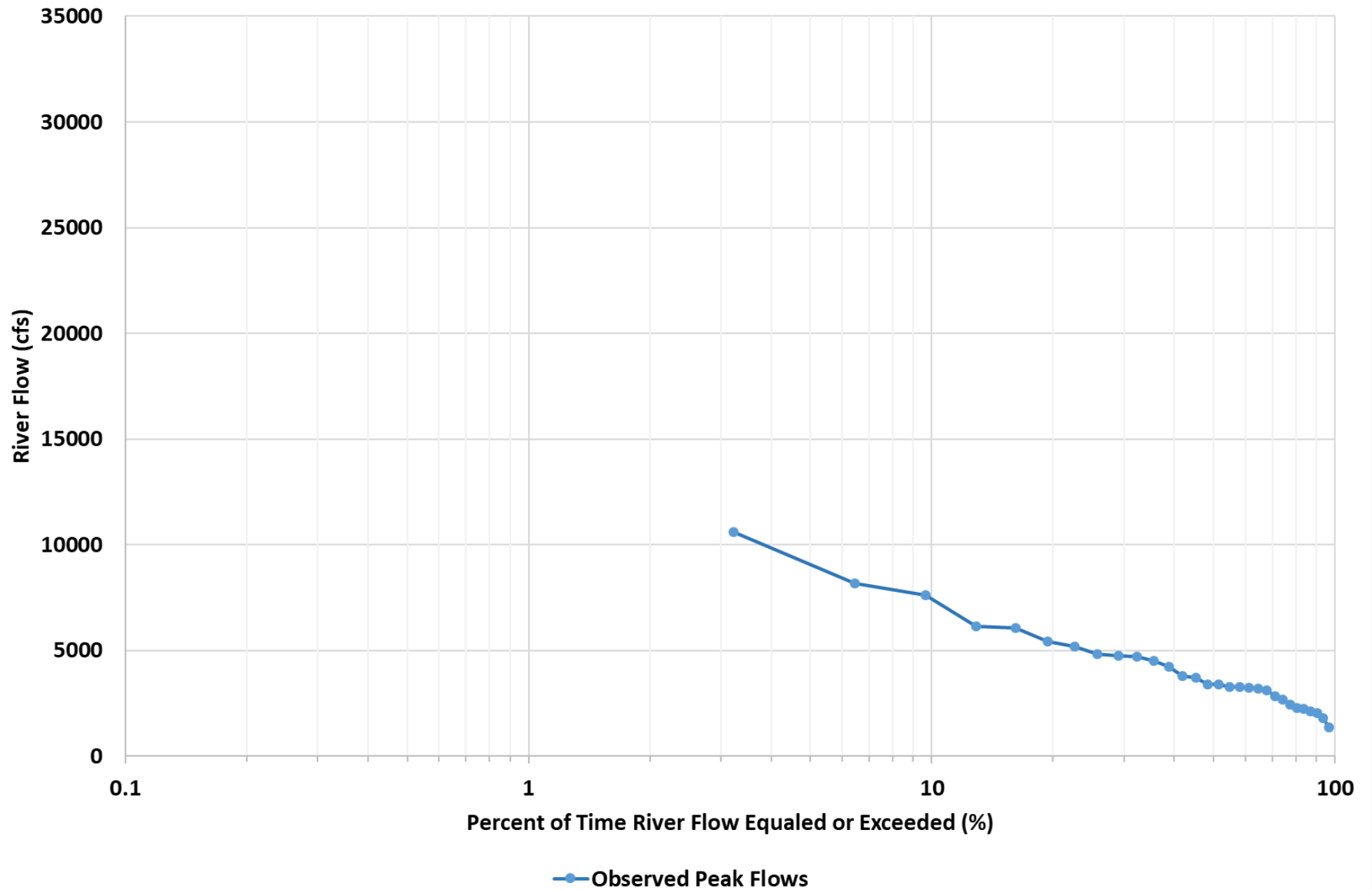
Period of Record: 1987 to 2017



Mississippi River-Brainerd USGS Gage 05242300

March Flow Duration Curve

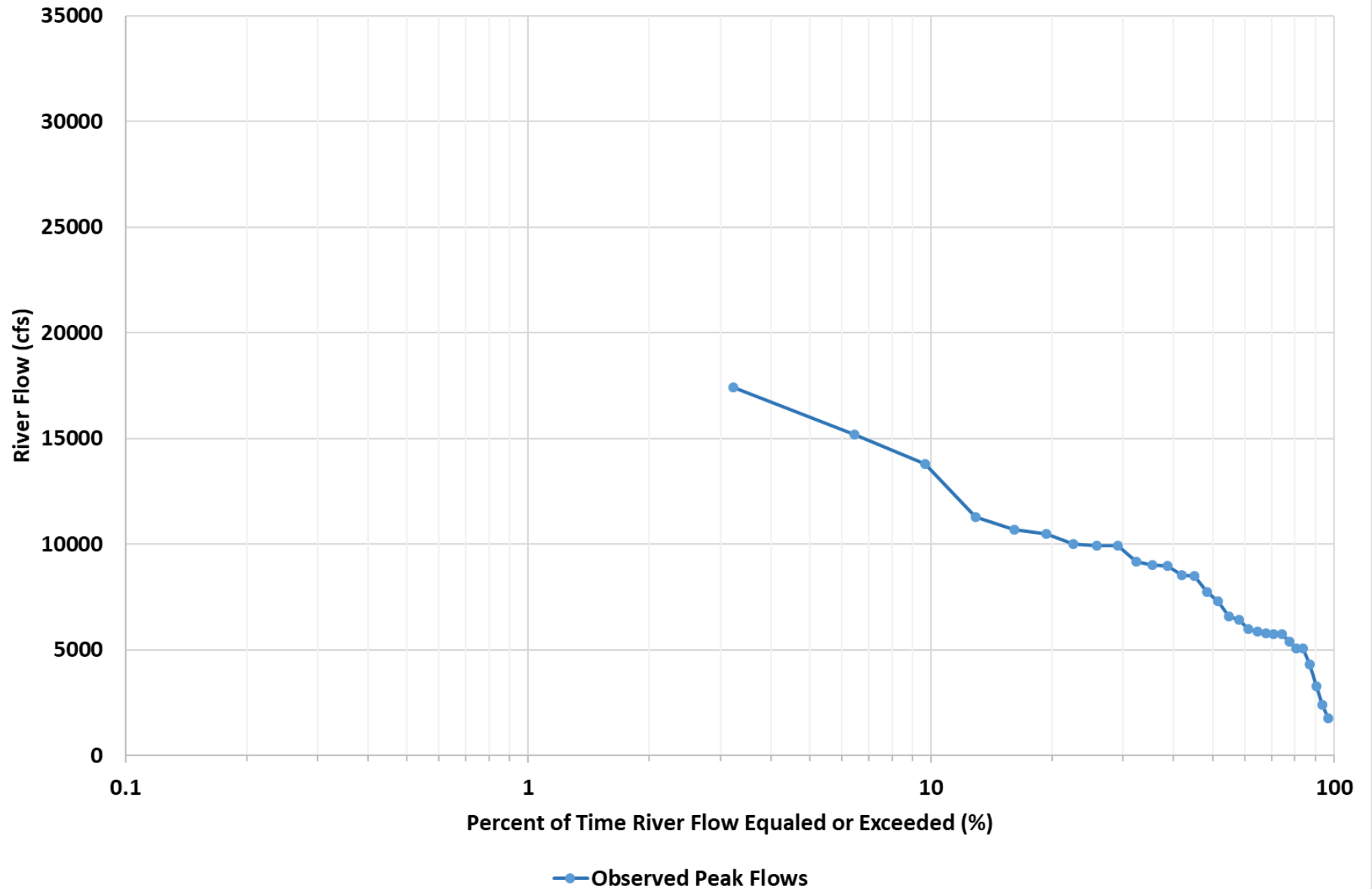
Period of Record 1987 to 2017



Mississippi River-Brainerd USGS Gage 05242300

April Flow Duration Curve

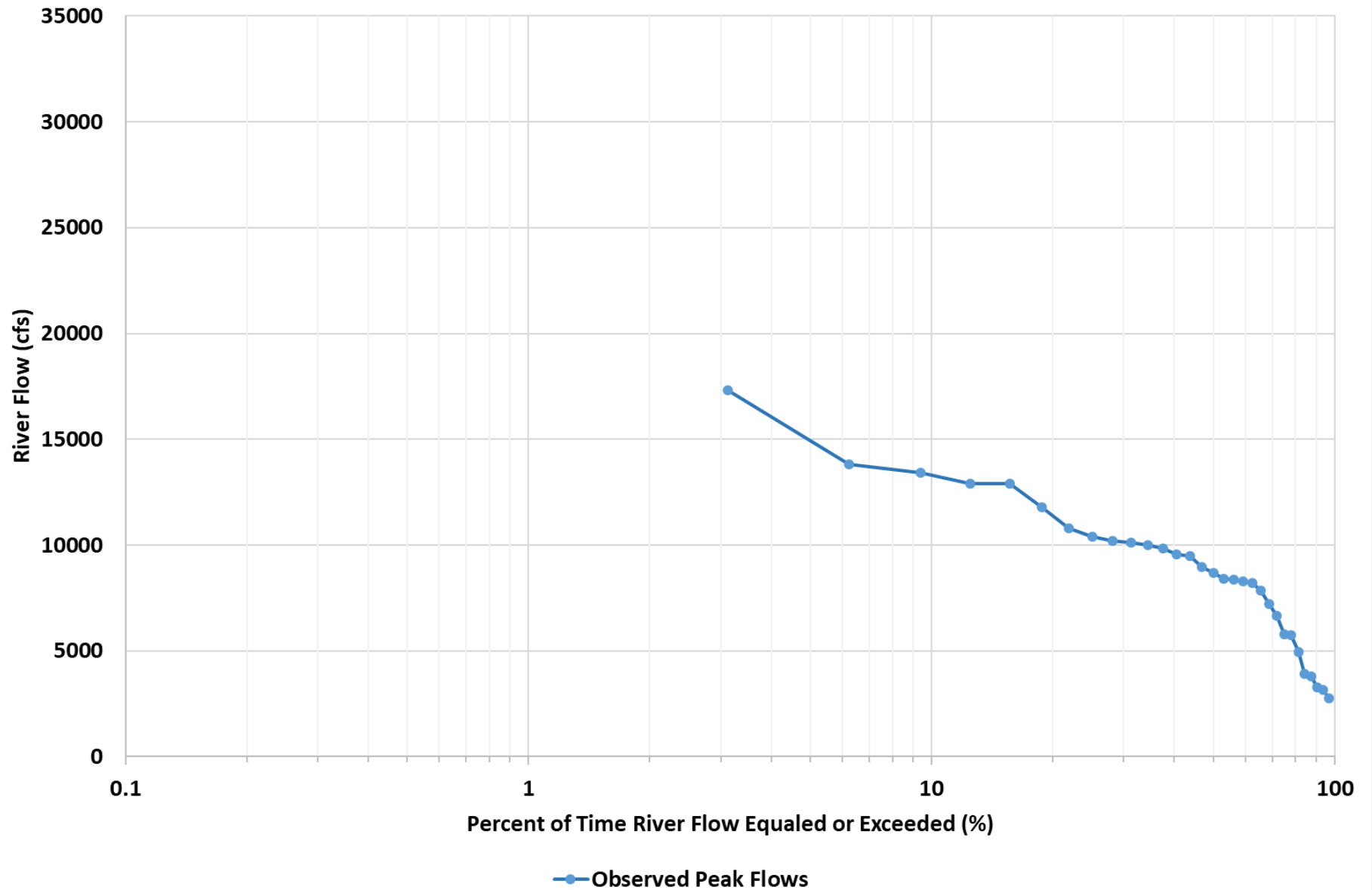
Period of Record: 1987 to 2017



Mississippi River-Brainerd USGS Gage 05242300

May Flow Duration Curve

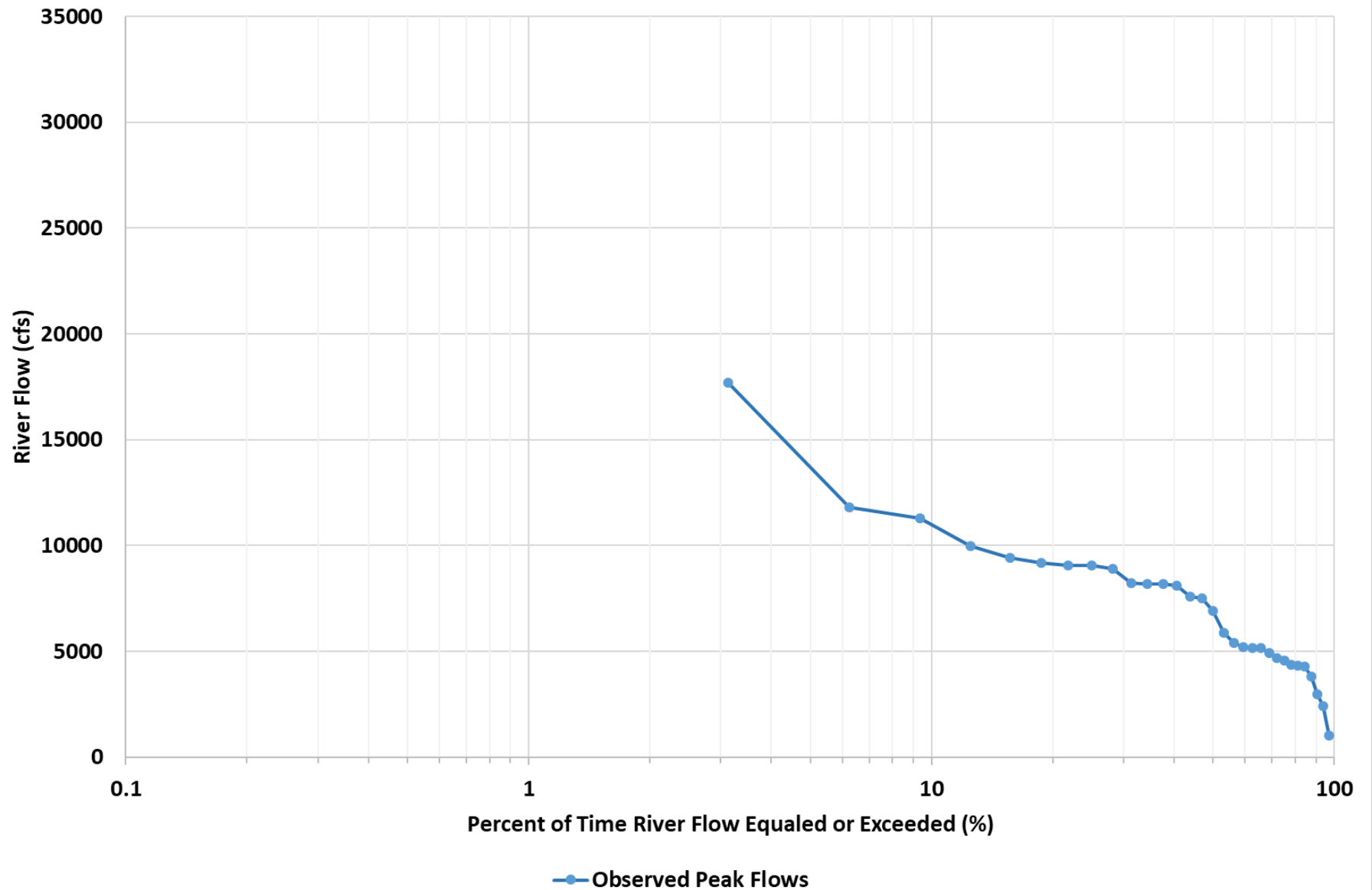
Period of Record: 1987 to 2017



Mississippi River-Brainerd USGS Gage 05242300

June Flow Duration Curve

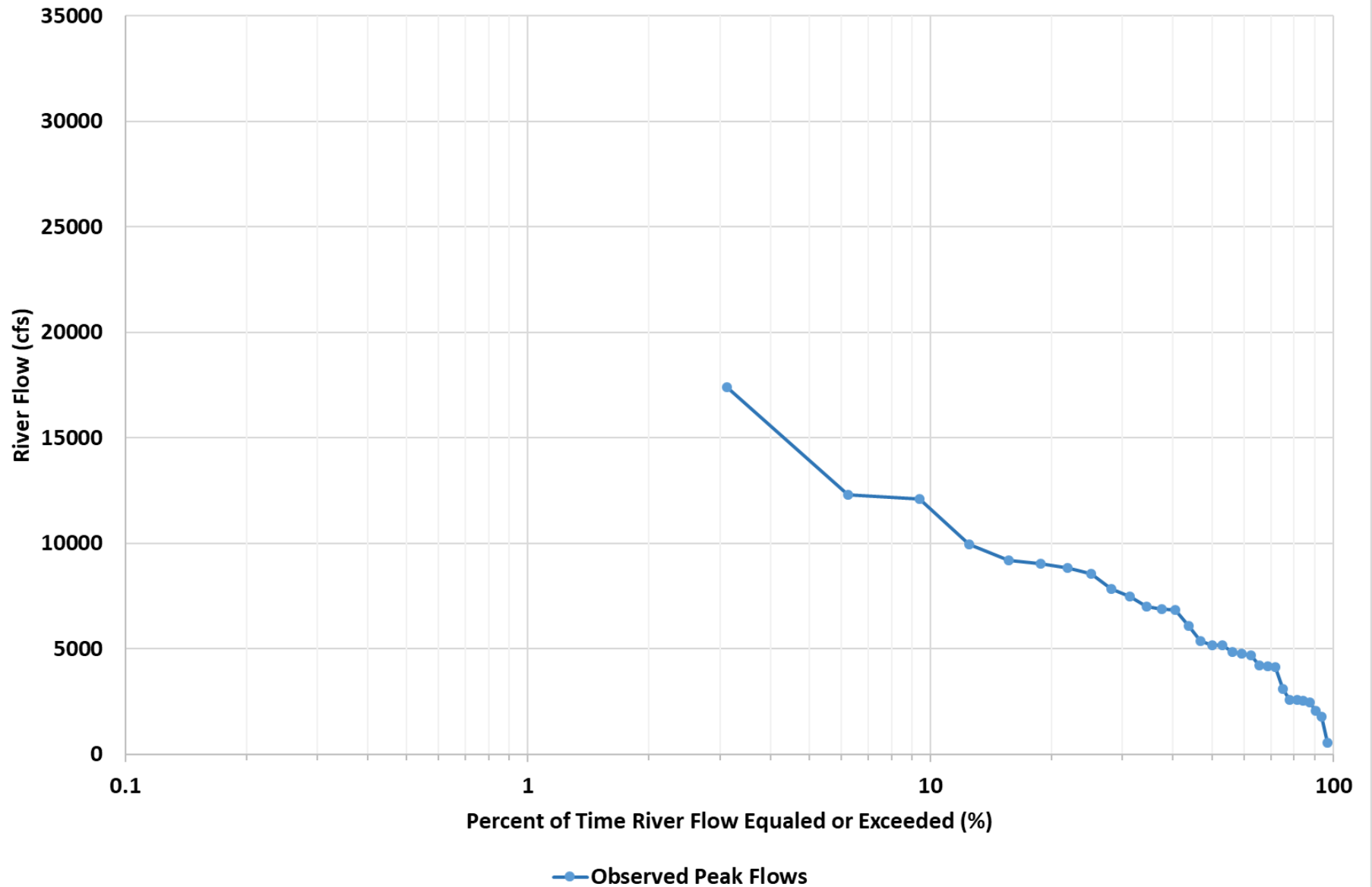
Period of Record: 1987 to 2017



Mississippi River-Brainerd USGS Gage 05242300

July Flow Duration Curve

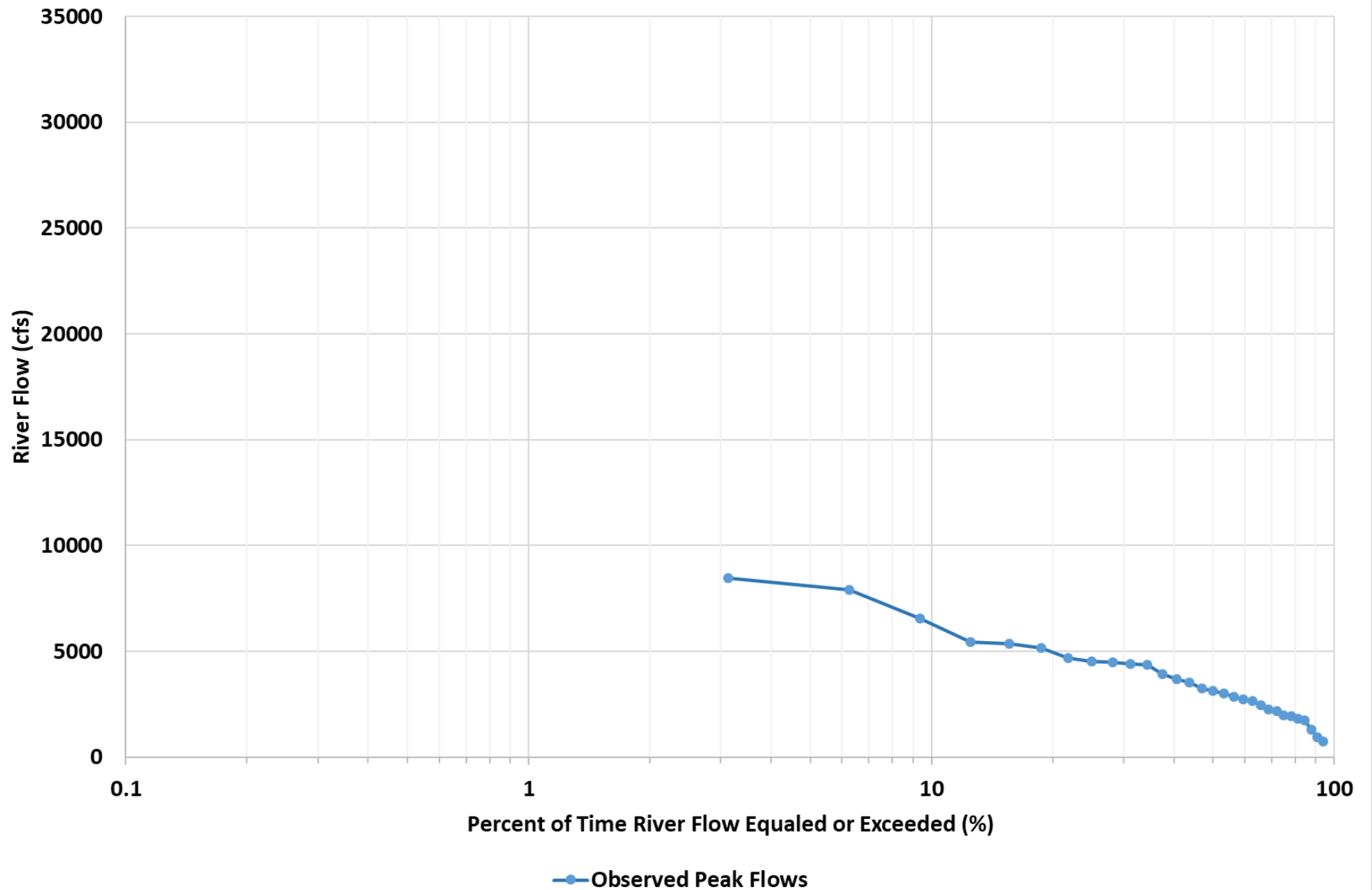
Period of Record: 1987 to 2017



Mississippi River-Brainerd USGS Gage 05242300

August Flow Duration Curve

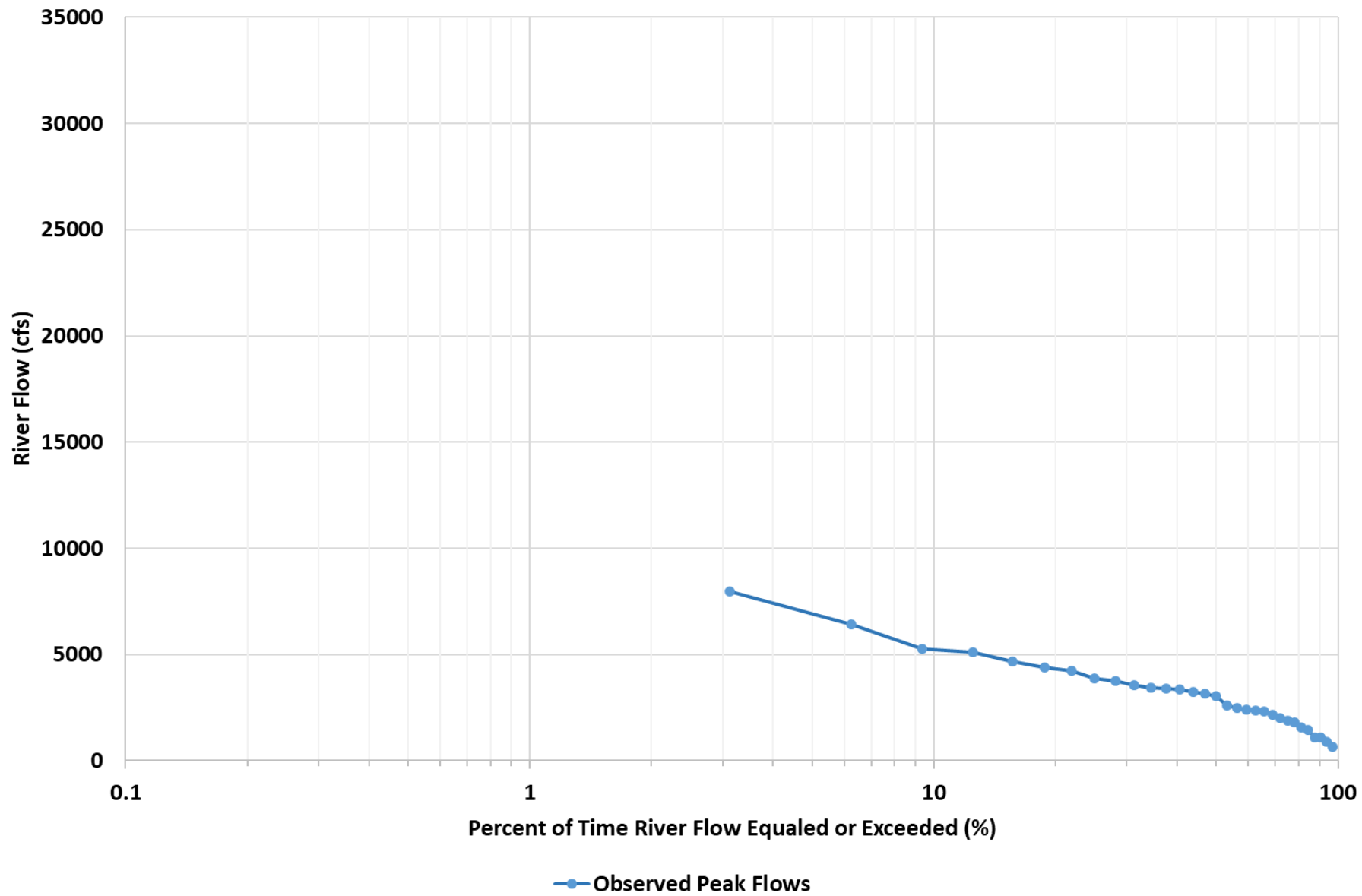
Period of Record: 1987 to 2017



Mississippi River-Brainerd USGS Gage 05242300

September Flow Duration Curve

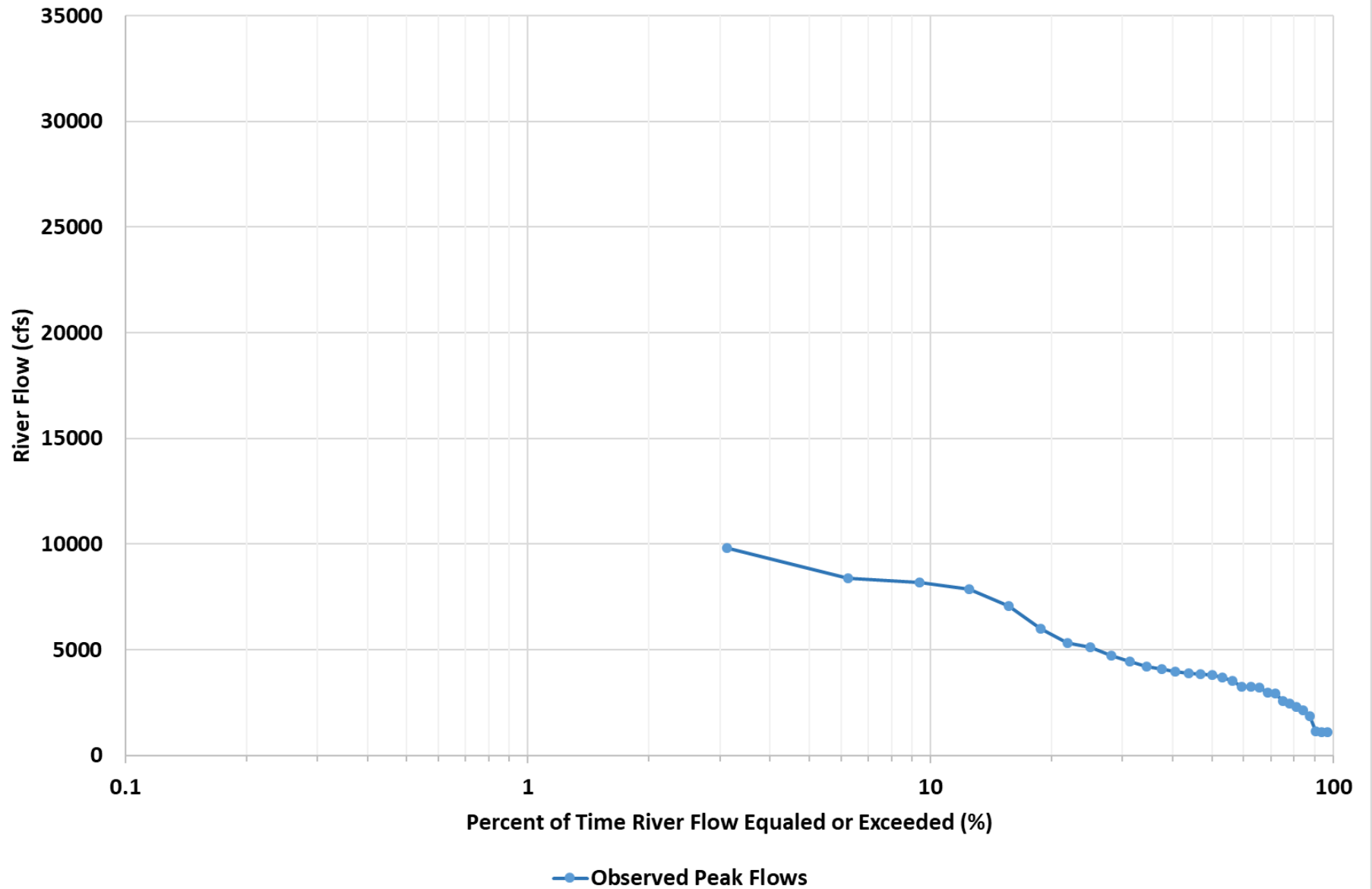
Period of Record: 1987 to 2017



Mississippi River-Brainerd USGS Gage 05242300

October Flow Duration Curve

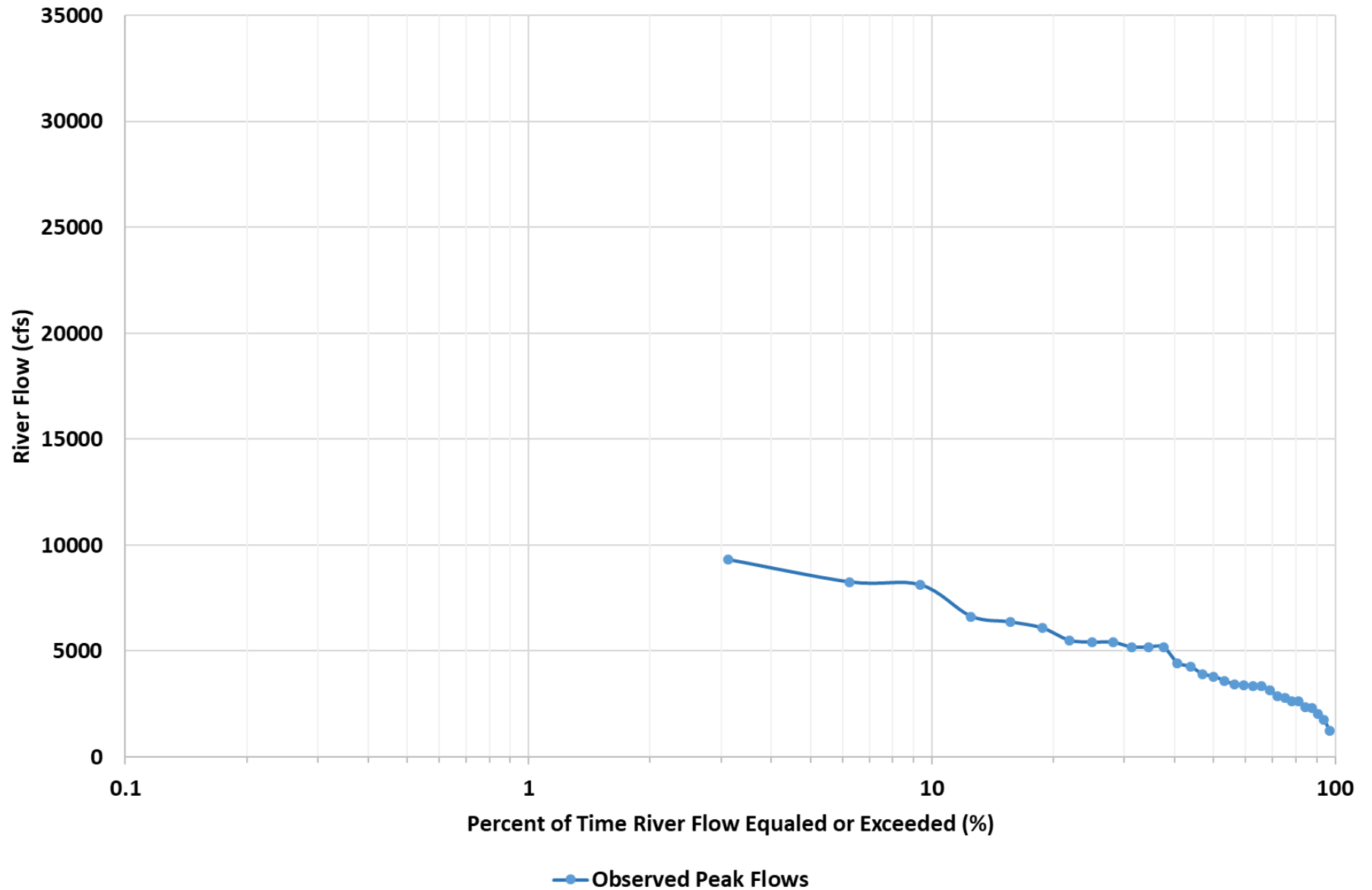
Period of Record: 1987 to 2017



Mississippi River-Brainerd USGS Gage 05242300

November Flow Duration Curve

Period of Record: 1987 to 2017



Mississippi River-Brainerd USGS Gage 05242300

December Flow Duration Curve

Period of Record: 1987 to 2017

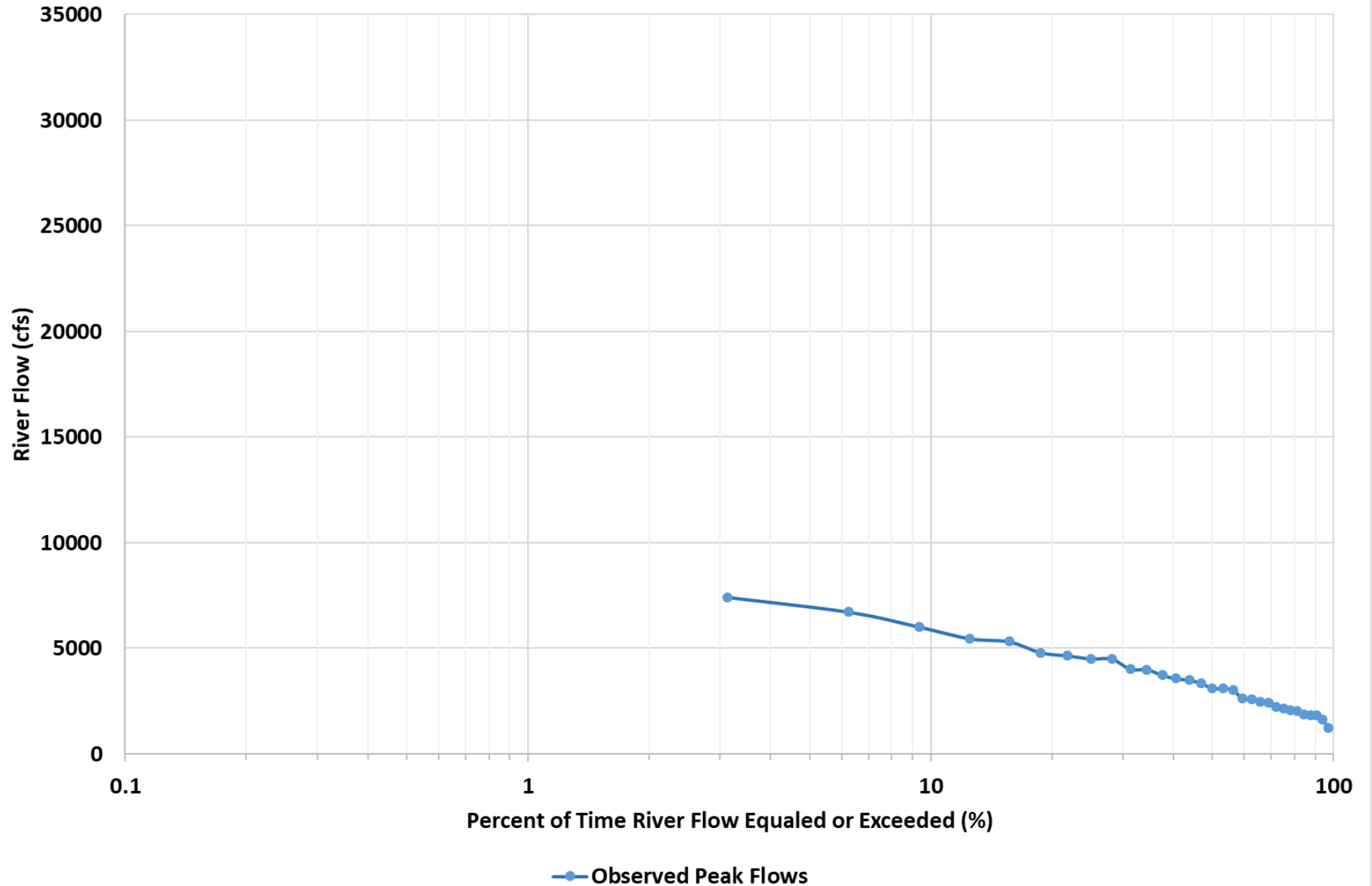




EXHIBIT A	G-06
BRAINERD PUBLIC UTILITIES	BRAINERD, MN
<p>BRAINERD HYDROELECTRIC PROJECT</p> <p>FERC PROJECT NO. 02533</p> <p>MISSISSIPPI RIVER</p> <p>CROW WING COUNTY, MINNESOTA</p> <p>Site Plan</p>	
SCALE AS SHOWN DATE 07/21/2021	BARR ENGINEERING CO. MINNEAPOLIS, MN 55435

Appendix B

Exhibit A – Project Description Attachments (Cell)

- **Project Features (Exhibit A-4)**
- **Single Line Diagram (Exhibit A-5)**

Appendix C

Exhibit E – Environmental Report Attachments (Public)

- Minnesota River Trail Maps (Exhibit E-1)
- Consultation Letter from the MPCA, dated March 18, 2018 (Exhibit E-2)
 - Project Boundary (Figure E-3)
 - Drawing G-06 Principal Project Features (Exhibit E-4)
 - Project Maps (Exhibit E-5)
- Dissolved Oxygen and Temperature Study Report (Exhibit E-6)
- Fish Impingement and Entrainment Study Report (Exhibit E-7)
 - Botanical Resources Memo (Exhibit E-8)
 - Updated IPAC List (Exhibit E-9)
 - Recreation Use and Inventory Study (Exhibit E-10)
 - Distribution List (Exhibit E-11)
- Coastal Zone Management Coordination (Exhibit E-12)

MISSISSIPPI RIVER STATE WATER TRAIL
MAP 1 - Lake Itasca to Cass Lake

- Carry-in Access

Trailer Access

Hospital/Clinic

Shelter

Rest Area
- Fishing Pier

Campground

Watercraft Campsite

Point of Interest
- Dam

Drinking Water

State Unit Boundaries

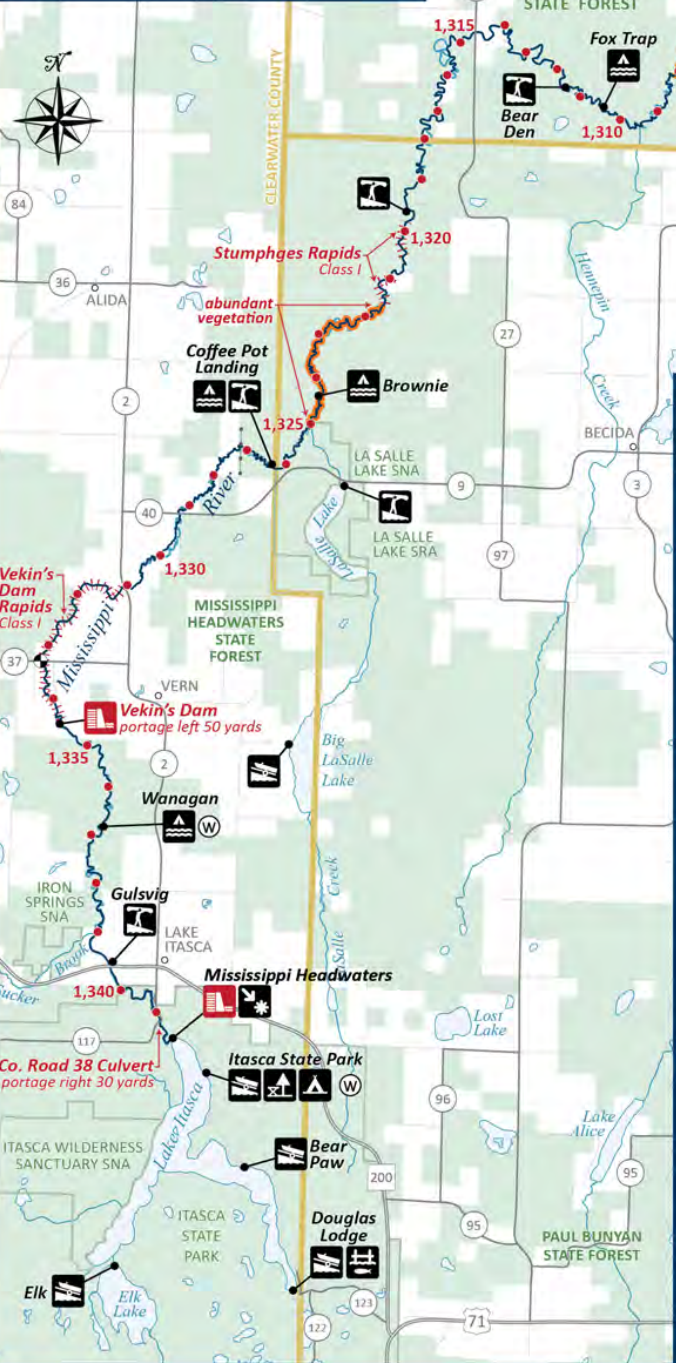
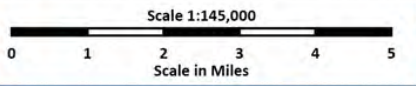
Public Lands
- Power Lines

Hazard Areas

Rapids

River Miles

River Level Gauge



ROUTE DESCRIPTION

River miles 1,341 to 1,258 (83 miles)

(R) and (L) are right and left banks of the river when facing downstream.
Red text indicates caution areas.

- 1341.6

Mississippi Headwaters/Itasca State Park.
- 1341.2

Co. Road 38 Culvert: Portage right 30 yards.
- 1339.6 (R)

Gulsvig Landing: Carry-in access.
- 1336.8 (R)

Wanagan campsite: Drinking water.
- 1334.4 (L)

Vekin's Dam: Portage left 50 yards.
- 1334.4-1331

Vekin's Dam Rapids: Class I rapids for next four miles.
- 1333.2

Co. Road 37 bridge.
- 1331.1

Co. Road 2 bridge.
- 1329.2

Co. Road 40 bridge.
- 1327.1

Power line crossing.
- 1326.2 (L)

Coffee Pot Landing: Carry-in access, campsite.
- 1325 (R)

LaSalle Creek confluence.
- 1325-1321.6

Caution: The Mississippi enters a large wetland area prone to aquatic vegetation obstructions.
- 1324.4 (L)

Brownie campsite.
- 1321.5-1320

Stumphges Rapids: Class I rapids for two half-mile segments.
- 1319.6 (L)

Forest Road bridge and carry-in access.
- 1314.7

Co. Road 5 bridge.
- 1311.4 (L)

Bear Den Landing: Carry-in access.
- 1310.4 (L)

Fox Trap: Campsite.

- 1309.5 (R)

Hennepin Creek confluence.
- 1307.8 (R)

Pine Point: Carry-in access and campsite.
- 1308.1-1300.6

Caution: The river enters a large wetland area prone to aquatic vegetation obstructions.
- 1306.5 (L)

Rice Lake channel confluence.
- 1301.2 (L)

Iron Bridge: Campsite.
- 1300.6 (R)

Iron Bridge: Carry-in access.
- 1294

Fern Lake Road SW bridge.
- 1290.2

Co. Road 11 bridge.
- 1290

Power line crossing.
- 1289.8 (L)

Silver Maple: Campsite.
- 1288.7

US Highway 2/Yellowhead Road. A series of three bridges. Power line crosses the river nearby.
- 1288-1287

Caution: Submerged pilings by public access. Stay in marked channel to avoid underwater hazard.
- 1287.1 (R)

Lake Irving: Carry-in access. Trailer access downstream 1 river mile (R).
- 1286.9

City of Bemidji.
- 1286.9-1284.1

Caution: Wind can produce large waves. Paddling across bigger lakes is not recommended, but if you do, stay closer to the shore.
- 1284.1

Lake Bemidji State Park.
- 1284

Paul Bunyan State Trail and Co. Road 19 Bridge.
- 1279.1 (L)

Stump Lake campsite.
- 1277.7

Co. Road 12 Dam: Portage right 125 yards.
- 1275.8 (L)

Island Point: Campsite.

- 1275.1

Island Point Rapids: Class I rapids. No established portage.
- 1274.7

Co. Road 8 bridge.
- 1273.9 (R)

Co. Road 25: Carry-in access.
- 1272.3 (L)

High Banks: Provides a view of the river and Wolf Lake.
- 1271.5 (R)

Wolf Lake: Trailer access.
- 1269.5

Co. Road 8 bridge and power line crossing.
- 1267.5

Andrusia: Carry-in Access. Trailer access is north on lake.
- 1266.8-1258.2

Cass Lake: Wind can produce large waves. Paddling across bigger lakes is not recommended, but if you do, stay closer to the shore.
- 1266.8-1264

Allen's Bay.
- 1264-1262

Star Island: There is a campsite on the south side of the lake.
- 1264.6

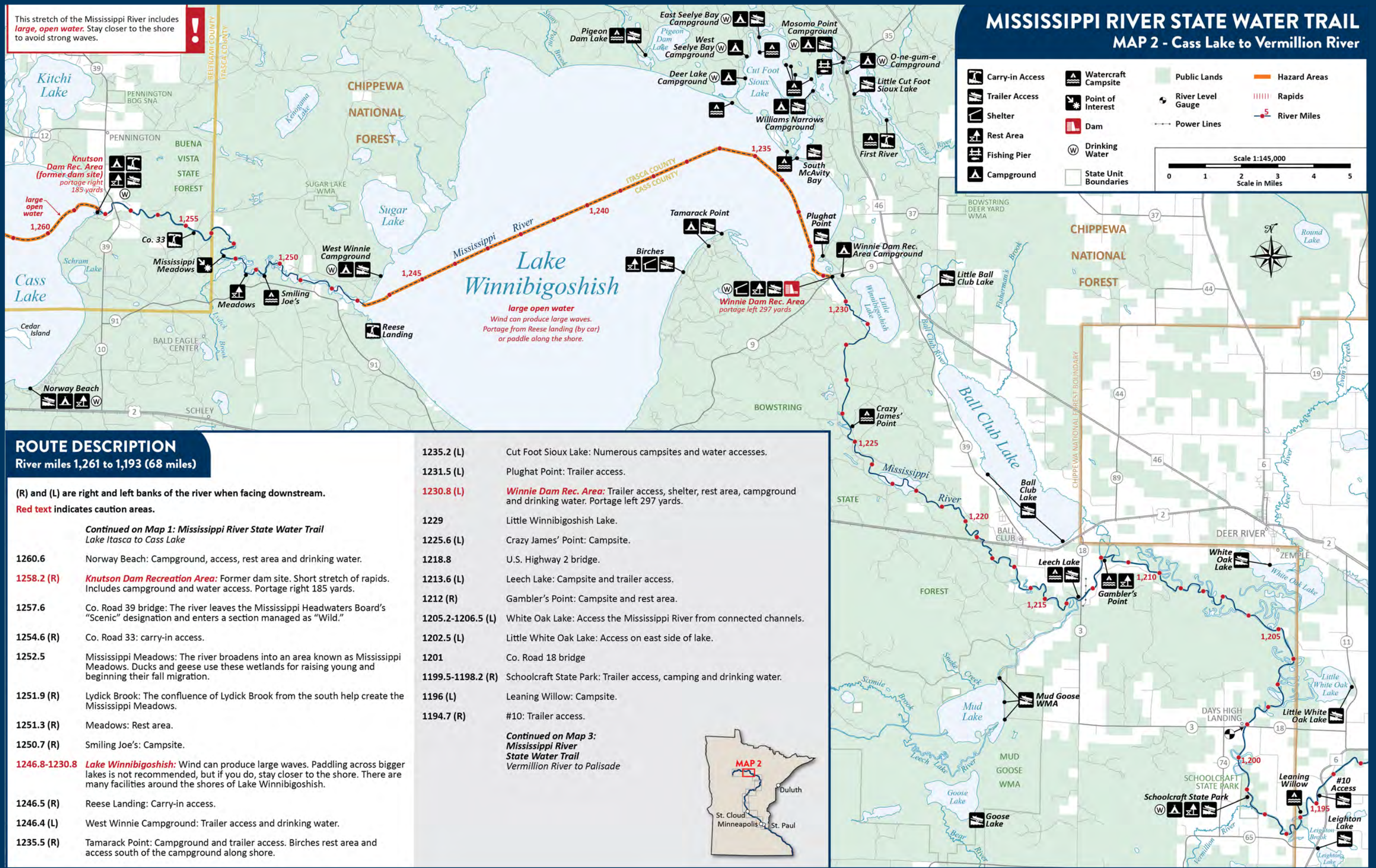
City of Cass Lake.
- 1258.2 (R)

Knutson Dam Recreation Area: Former dam site. Short stretch of rapids. Includes campground and water access. Portage right 185 yards.
- Continued on Map 2: Mississippi River State Water Trail
Cass Lake to Vermillion River



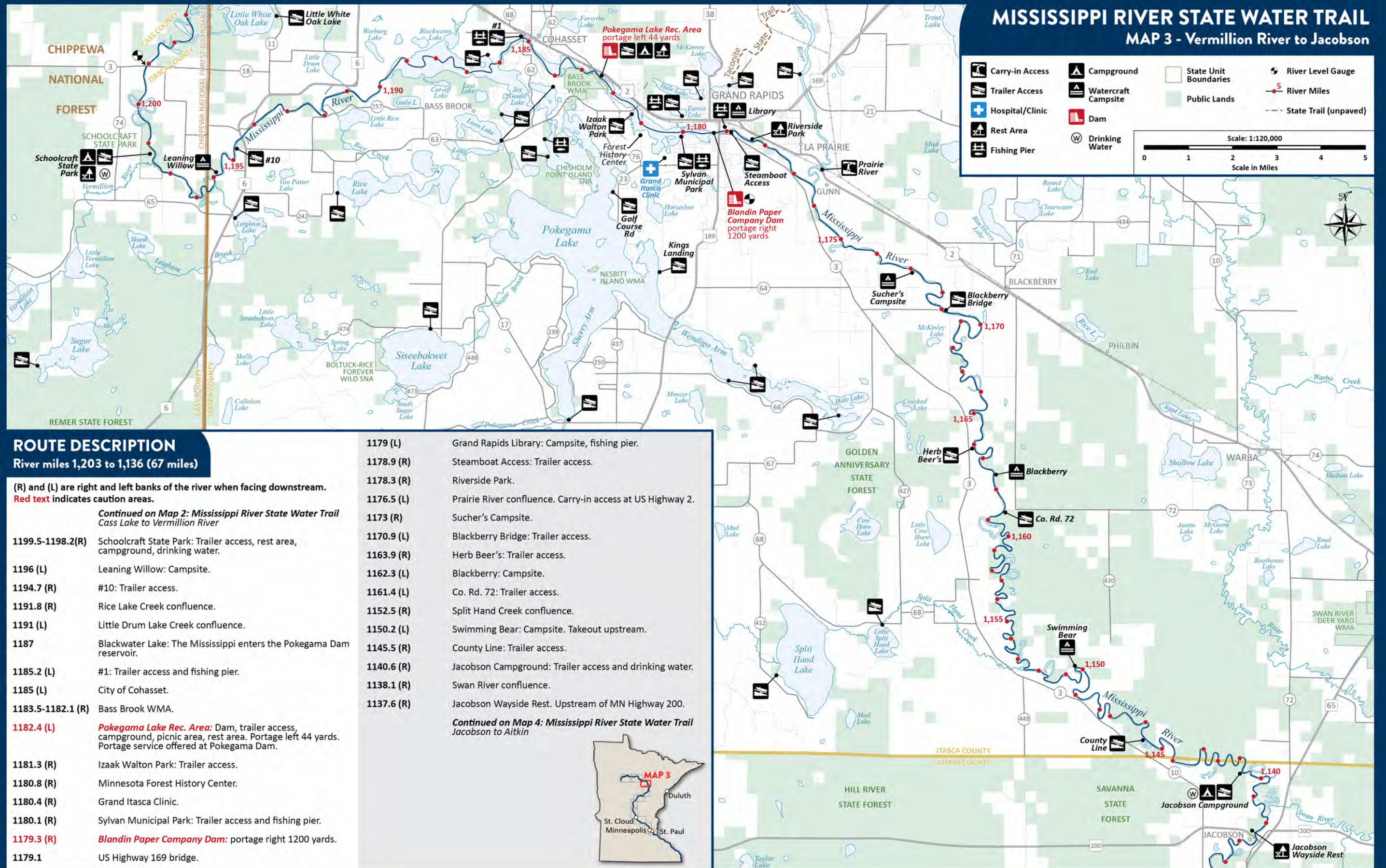
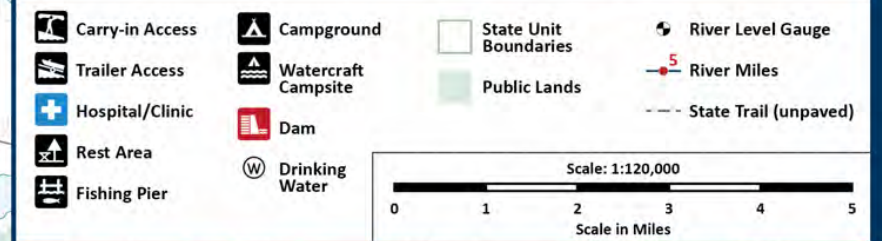
! This stretch of the Mississippi River includes areas with **abundant vegetation, log jams and large, open water.** Use Caution.

This stretch of the Mississippi River includes **large, open water**. Stay closer to the shore to avoid strong waves.



MISSISSIPPI RIVER STATE WATER TRAIL

MAP 3 - Vermillion River to Jacobson



ROUTE DESCRIPTION

River miles 1,203 to 1,136 (67 miles)

(R) and (L) are right and left banks of the river when facing downstream.
Red text indicates caution areas.

- Continued on Map 2: Mississippi River State Water Trail
Cass Lake to Vermillion River*
- 1199.5-1198.2(R) Schoolcraft State Park: Trailer access, rest area, campground, drinking water.
 - 1196 (L) Leaning Willow: Campsite.
 - 1194.7 (R) #10: Trailer access.
 - 1191.8 (R) Rice Lake Creek confluence.
 - 1191 (L) Little Drum Lake Creek confluence.
 - 1187 Blackwater Lake: The Mississippi enters the Pokegama Dam reservoir.
 - 1185.2 (L) #1: Trailer access and fishing pier.
 - 1185 (L) City of Cohasset.
 - 1183.5-1182.1 (R) Bass Brook WMA.
 - 1182.4 (L) **Pokegama Lake Rec. Area:** Dam, trailer access, campground, picnic area, rest area. Portage left 44 yards. Portage service offered at Pokegama Dam.
 - 1181.3 (R) Izaak Walton Park: Trailer access.
 - 1180.8 (R) Minnesota Forest History Center.
 - 1180.4 (R) Grand Itasca Clinic.
 - 1180.1 (R) Sylvan Municipal Park: Trailer access and fishing pier.
 - 1179.3 (R) **Blandin Paper Company Dam:** portage right 1200 yards.
 - 1179.1 US Highway 169 bridge.

- 1179 (L) Grand Rapids Library: Campsite, fishing pier.
- 1178.9 (R) Steamboat Access: Trailer access.
- 1178.3 (R) Riverside Park.
- 1176.5 (L) Prairie River confluence. Carry-in access at US Highway 2.
- 1173 (R) Sucher's Campsite.
- 1170.9 (L) Blackberry Bridge: Trailer access.
- 1163.9 (R) Herb Beer's: Trailer access.
- 1162.3 (L) Blackberry: Campsite.
- 1161.4 (L) Co. Rd. 72: Trailer access.
- 1152.5 (R) Split Hand Creek confluence.
- 1150.2 (L) Swimming Bear: Campsite. Takeout upstream.
- 1145.5 (R) County Line: Trailer access.
- 1140.6 (R) Jacobson Campground: Trailer access and drinking water.
- 1138.1 (R) Swan River confluence.
- 1137.6 (R) Jacobson Wayside Rest. Upstream of MN Highway 200.

*Continued on Map 4: Mississippi River State Water Trail
Jacobson to Aitkin*



ROUTE DESCRIPTION

River miles 1,145 to 1,056 (89 miles)

(R) and (L) are right and left banks of the river when facing downstream.
Red text indicates caution areas.

- Continued on Map 3: Mississippi River State Water Trail
Vermillion River to Jacobson
- 1140.6 (R)

Jacobson Campground: Trailer access and drinking water.
- 1138.1 (R)

Swan River confluence.
- 1137.6 (R)

Jacobson Wayside Rest.
- 1137.6

MN Highway 200 bridge.
- 1128.2 (R)

Willow Wood: Campsite. River access only. Takeout downstream of campsite. Please be respectful of private property.
- 1122.9 (R)

Pokegama Creek confluence.
- 1122.2 (L)

Ms. Keto: Campsite. River access only. Riffles and rocks may be present during low flow conditions. Please be respectful of private property.
- 1121.3 (R)

Verdon: Carry-in access and campsite.
- 1118 (L)

Two River Springs confluence.
- 1117.9

Power line crossing.
- 1113.2 (L)

Libby Brook confluence.
- 1111 (L)

Lee Ferry: Carry-in access.
- 1109.5 (L)

Libby Township: Campsite.
- 1105.5 (L)

Sandy Lake Rec. Area: Trailer access, shelters, rest area, picnic area and campground. Managed by the U.S. Army Corps of Engineers.
- 1101.4 (L)

Scott's Rapids: Campsite. Access by river only.
- 1096 (R)

Wold's Ferry Crossing: Trailer access.
- 1086.5

Co. Hwy 3 bridge.
- 1086.4 (R)

Berglund County Park: Trailer access, campground, shelters, picnic area and drinking water.
- 1081.9 (L)

Maydale Oxbow.
- 1080 (L)

Clark Logan Oxbow.
- 1078.5 (R)

Willow River: Campsite. Access by river only.
- 1074.1 (R)

Hwy 169: Trailer access. U.S. Hwy 169 bridge downstream.
- 1067.6 (L)

Hassman: Campsite. Access by river only. Takeout is upstream of campsite.
- 1066.5 (L)

Rice River confluence.
- 1064.4 (R)

Aitkin Flood Diversion Channel: Use caution and follow the main channel. No portage.
- 1062.6 (L)

Kimball: Carry-in access.
- 1062

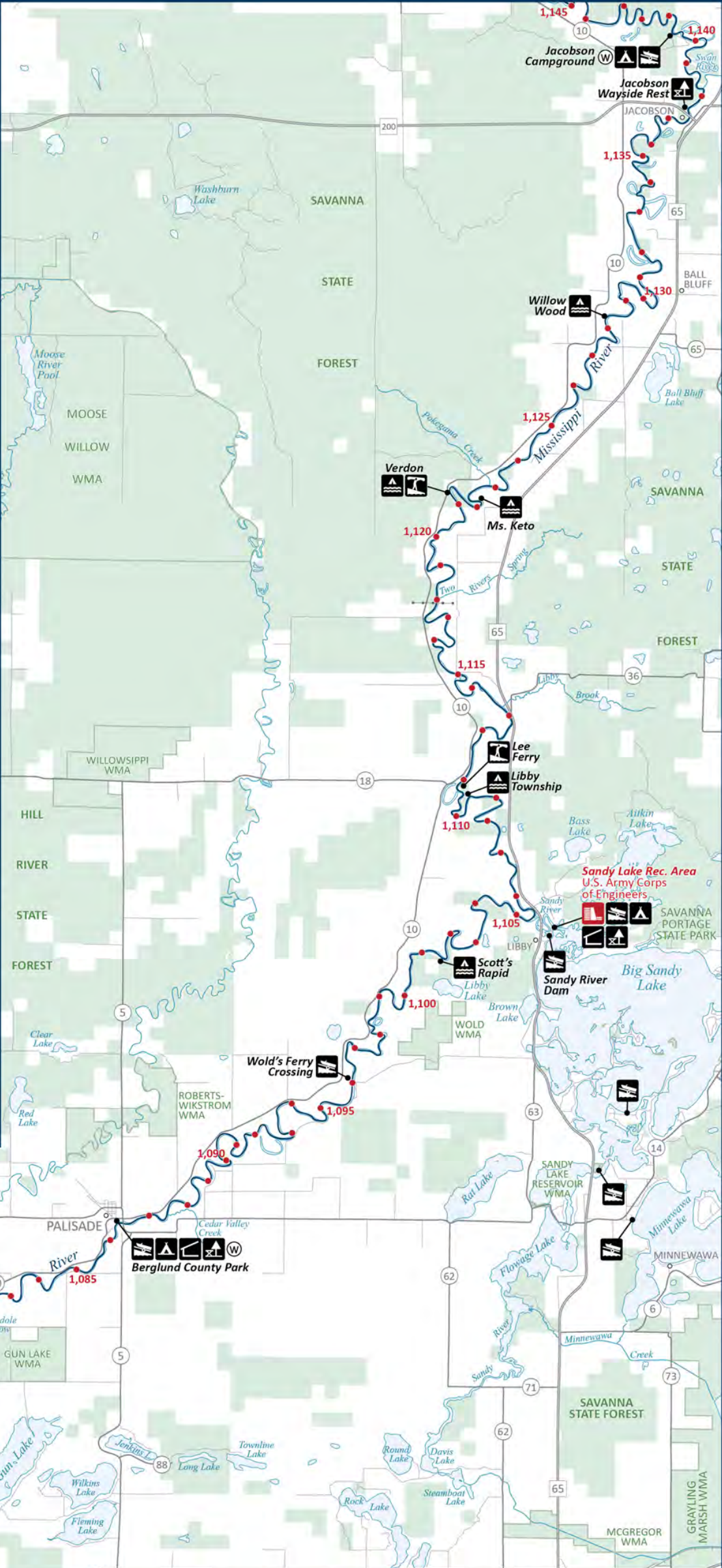
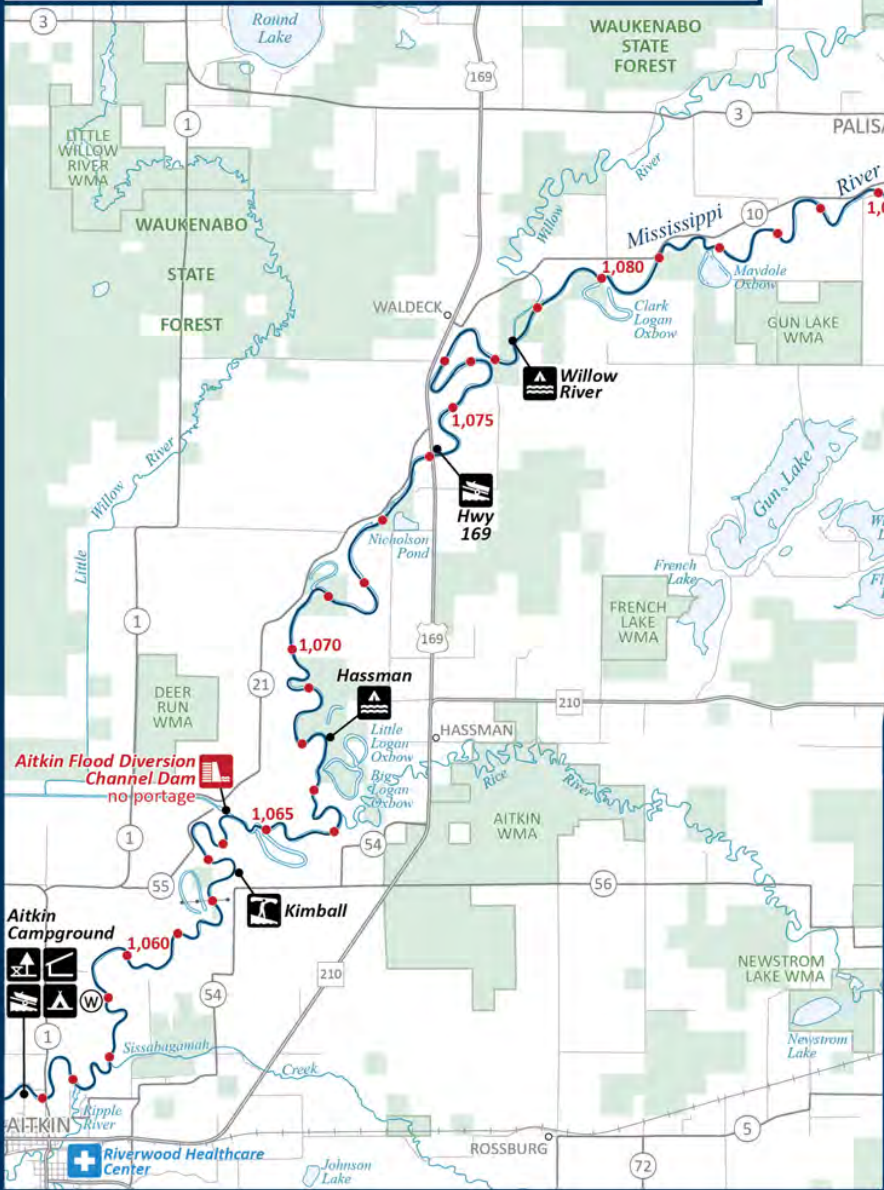
Power line crossing.
- 1058 (L)

Sissabagamah Creek confluence.
- 1057.1 (L)

Ripple River confluence.
- 1056.1

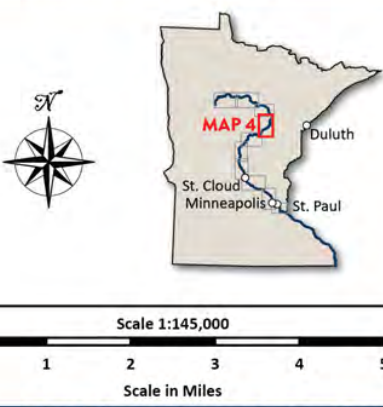
Co. Road 1 bridge.
- 1055.7 (L)

Aitkin Campgrounds: Trailer access, campgrounds, shelters, rest area.
- Continued on Map 5: Mississippi River State Water Trail
Aitkin to Brainerd



MISSISSIPPI RIVER STATE WATER TRAIL
MAP 4 - Jacobson to Aitkin

- Carry-in Access
- Trailer Access
- Rest Area
- Shelter
- Fishing Pier
- Campground
- Watercraft Campsite
- Dam
- Hospital/Clinic
- Drinking Water
- State Unit Boundaries
- Public Lands
- River Level Gauge
- Power Lines
- River Miles



MISSISSIPPI RIVER STATE WATER TRAIL
MAP 5 - Aitkin to Brainerd

Carry-in Access

Trailer Access

Hospital/Clinic

Shelter

Rest Area

Fishing Pier

Shore Fishing

Campground

Watercraft Campsite

Outfitters

Outfitters

Dam

Drinking Water

State Unit Boundaries

Public Lands

River Level Gauge

Power Lines

Rapids

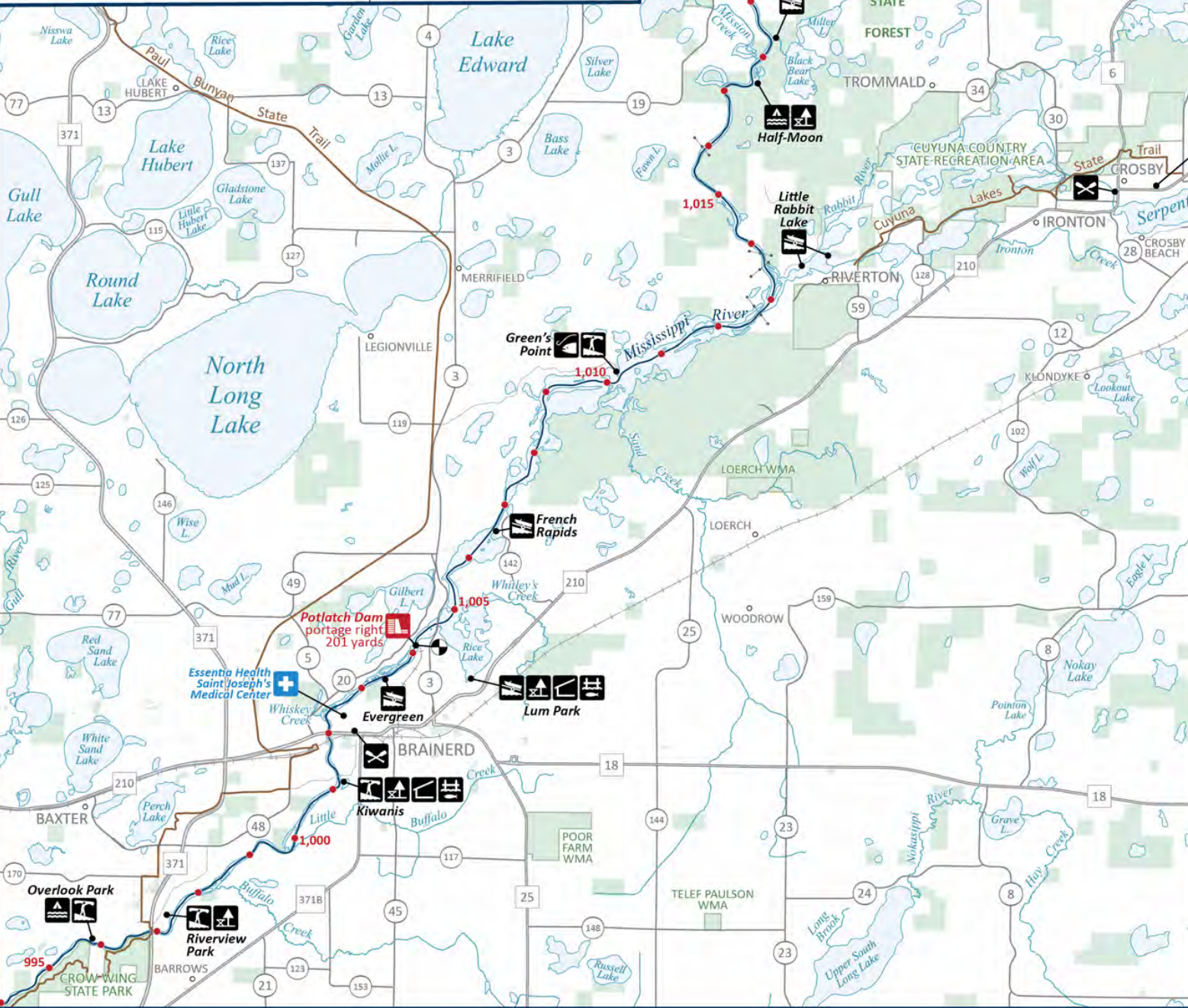
River Miles

State Trail (paved)

Scale 1:130,000

0 1 2 3 4 5

Scale in Miles



ROUTE DESCRIPTION
River miles 1,068 to 994 (74 miles)

(R) and (L) are right and left banks of the river when facing downstream.
Red text indicates caution areas.

- Continued on Map 4: Mississippi River State Water Trail Jacobson to Aitkin*
- 1067.6 (L) Hassman: Campsite. Access by river only. Takeout is upstream of campsite.
 - 1066.5 (L) Rice River confluence.
 - 1064.4 (R) **Aitkin Flood Diversion Channel Dam:** Use caution and follow the main channel. No portage.
 - 1336.8 (R) Kimball: Carry-in access.
 - 1062 Power line crossing.
 - 1058 (L) Sissabagamah Creek confluence.
 - 1057.1 (L) Ripple River confluence.
 - 1056.1 Co. Road 1 bridge.
 - 1055.7 (L) Aitkin Campgrounds: Trailer access, campgrounds, shelters, rest areas.
 - 1044.8 (L) Cedar Creek confluence.
 - 1042.6 Power line crossing.
 - 1034.3 (L) Lone Pine: Campsite. Access by river only.
 - 1030 (L) MN Hwy 6: Trailer access.
 - 1026 Power line crossing.
 - 1024.6 (R) Pine River confluence.
 - 1018.3 (L) Black Bear Creek & Trommald trailer access.
 - 1017.5 (L) Half-Moon: Campsite and picnic area.
 - 1015.9 Power line crossing.

- 1012.7-1013.8 Power line crossings.
- 1013.2 Rabbit River confluence.
- 1013.2 Little Rabbit Lake: Trailer access.
- 1010.3 (R) Green's Point: Carry-in access and shore fishing.
- 1006.5 (L) French Rapids: Trailer access.
- 1004.7 (L) Lum Park: Trailer access, rest area, shelter and fishing pier. RV camping only.
- 1004.1 **Potlatch Dam:** Portage right 201 yards.
- 1003.4 Evergreen: Trailer access.
- 1002 MN Hwy 200 bridge.
- 1001.2 (L) Kiwanis Park: Carry-in access, rest area, shelter and fishing pier.
- 998.2 (L) Buffalo Creek confluence.
- 997.3 (R) River View Park: Carry-in access, picnic and vault toilets.
- 997 Paul Bunyan State Trail. MN Hwy 371 bridge.
- 997-979.5 (L) Crow Wing State Park.
- 995.8 (R) Overlook Park: Carry-in access, camping, fire ring, vault toilets.

Continued on Map 6: Mississippi River State Water Trail Brainerd to Little Falls



MISSISSIPPI RIVER STATE WATER TRAIL
MAP 6 - Brainerd to Little Falls

Carry-in Access

Trailer Access

Hospital/Clinic

Shelter

Rest Area

Fishing Pier

Shore Fishing

Picnic Shelter

Campground

Watercraft Campsite

Primitive Group Camp

Outfitters

Dam

Point of Interest

Drinking Water

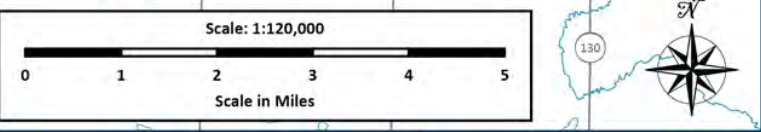
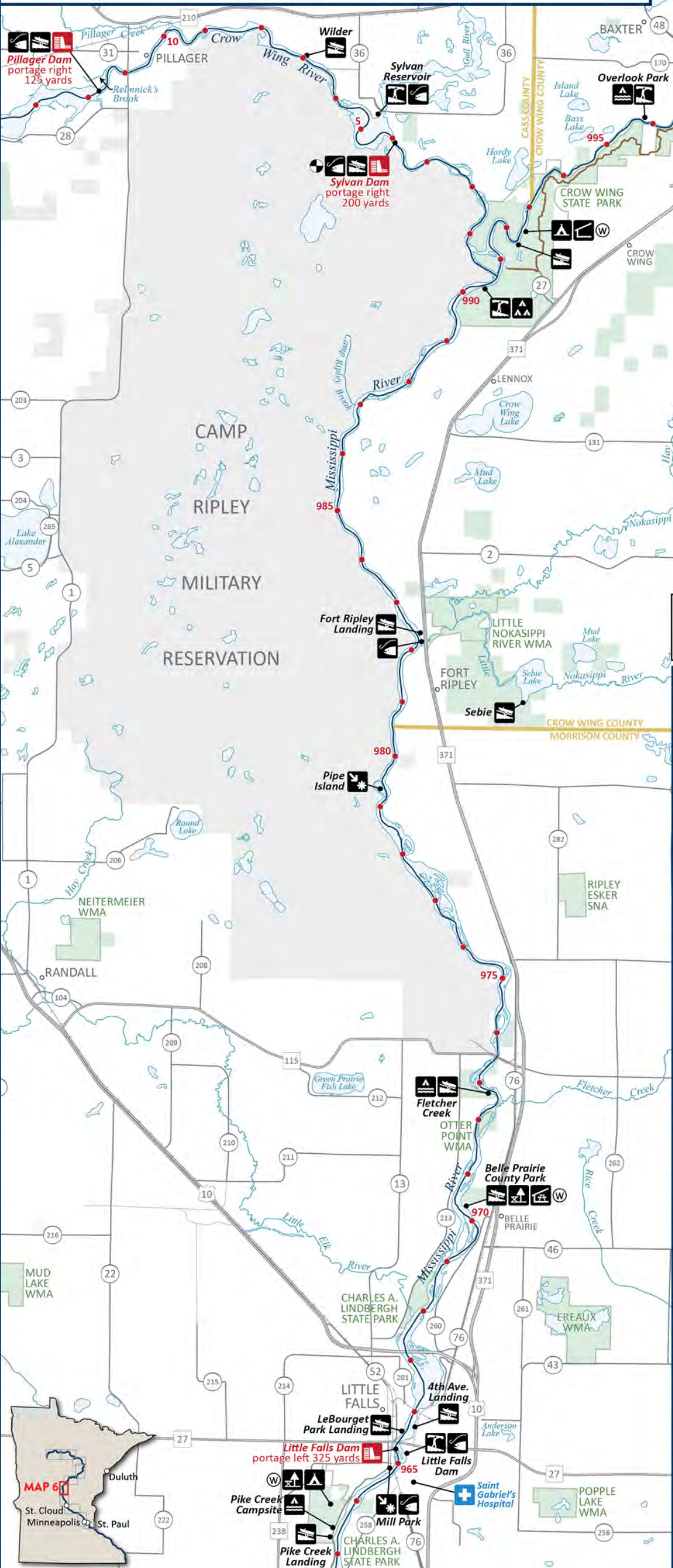
State Unit Boundaries

Public Lands

River Level Gauge

River Miles

State Trail (paved)



ROUTE DESCRIPTION
River miles 1,005 to 963 (42 miles)

- (R) and (L) are right and left banks of the river when facing downstream.
Red text indicates caution areas.
- Continued on Map 5: Mississippi River State Water Trail Aitkin to Brainerd*
- 1004.7 (L) Lum Park: Trailer access, rest area, shelter and fishing pier.
 - 1004.1 **Potlatch Dam:** Portage right 201 yards.
 - 1003.4 Evergreen: Trailer access.
 - 1002 MN Hwy 200 bridge.
 - 1001.2 (L) Kiwanis Park: Carry-in access, rest area, shelter and fishing pier.
 - 998.2 (L) Buffalo Creek confluence.
 - 997-979.5 (L) Crow Wing State Park: Includes numerous water accesses, camping, shelters and drinking water.
 - 997 MN Hwy 371 bridge. Paul Bunyan State Trail.
 - 995.8 (R) Baxter campsite.
 - 990.6 (R) Crow Wing River confluence.
 - 990.4 (L) Crow Wing State Park access, group camp (fee charged).
 - 982.3 (L) Fort Ripley Landing: Trailer access. Shore fishing downstream of the access.
 - 979.5-979.2 Pipe Island. Numerous smaller islands downstream.
 - 973.6 MN Hwy 115 bridge. South boundary of Camp Ripley.
 - 972.7 (R) Fletcher Creek: Trailer access and campsite.
 - 972.3-971.7 Otter Point Wildlife Management Area.
 - 970.2 (L) Belle Prairie County Park: Trailer access, rest area, large picnic shelter and drinking water.
 - 967.8 (R) Little Elk River confluence.
 - 967.2 U.S. Hwy 10 bridge.
 - 965.6 LeBourget Park/4th Ave. Landings. Accesses are on both sides of the river.
 - 965.2 **Little Falls Dam:** Portage left 325 yards.
 - 965.1 (L) Little Falls Dam: Carry-in access and shore fishing.
 - 964.8 (R) Mill Park: Shorefishing and historical site.
 - 964-963.1 (R) Charles A. Lindbergh State Park: Includes camping, rest areas, trailer access and drinking water.
 - 963.3 (R) Pike Creek Landing (trailer access).
- Continued on Map 7: Mississippi River State Water Trail Little*

MISSISSIPPI RIVER STATE WATER TRAIL
MAP 7 - Little Falls to St. Cloud

Carry-in Access

Trailer Access

Rest Area

Shelter

Fishing Pier

Shorefishing

Campground

Watercraft Campsite

Private Campground

Restrooms

Point of Interest

Outfitters

Hospital/Clinic

Dam

Drinking Water

State Unit Boundaries

Public Lands

Rapids

River Level Gauge

Power Lines

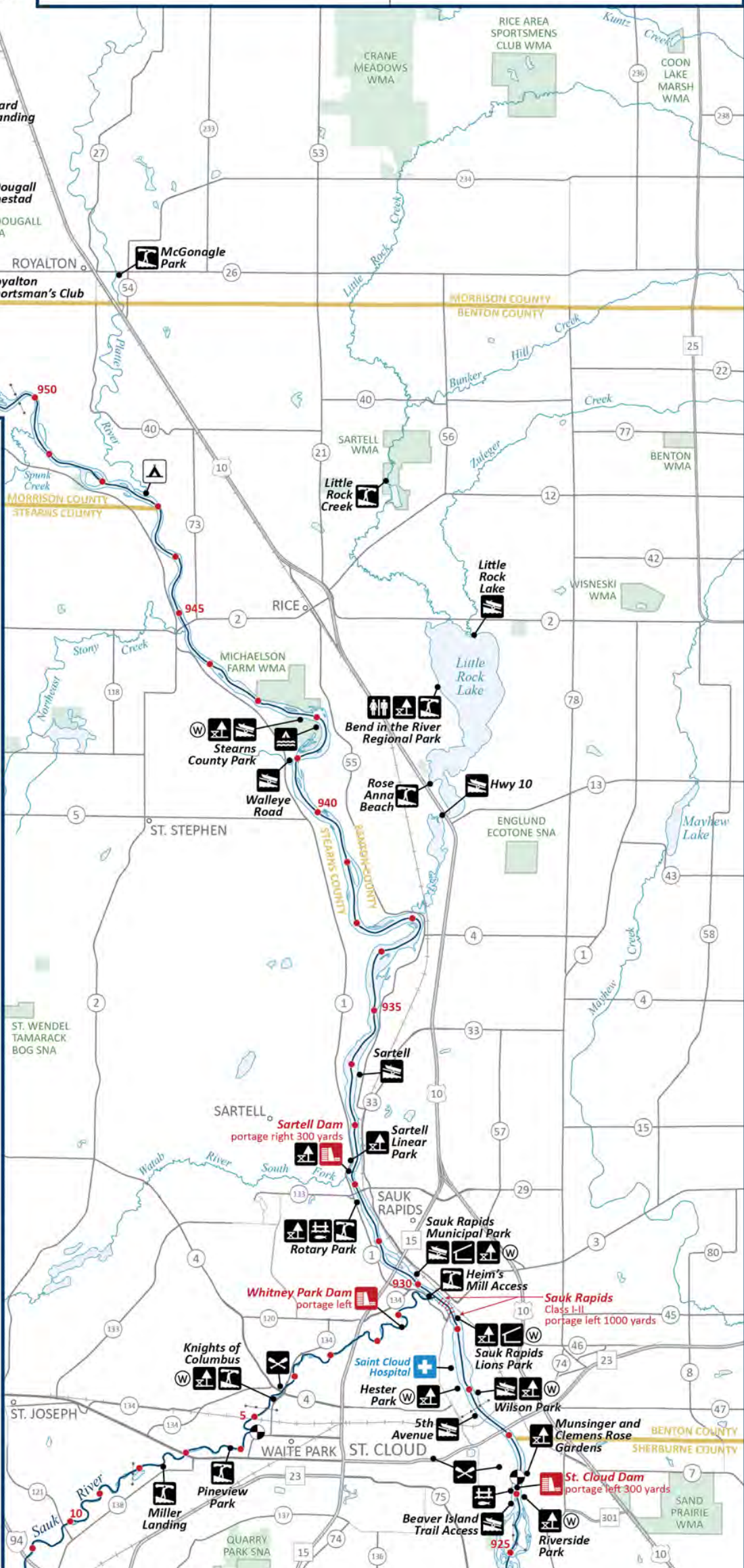
River Miles

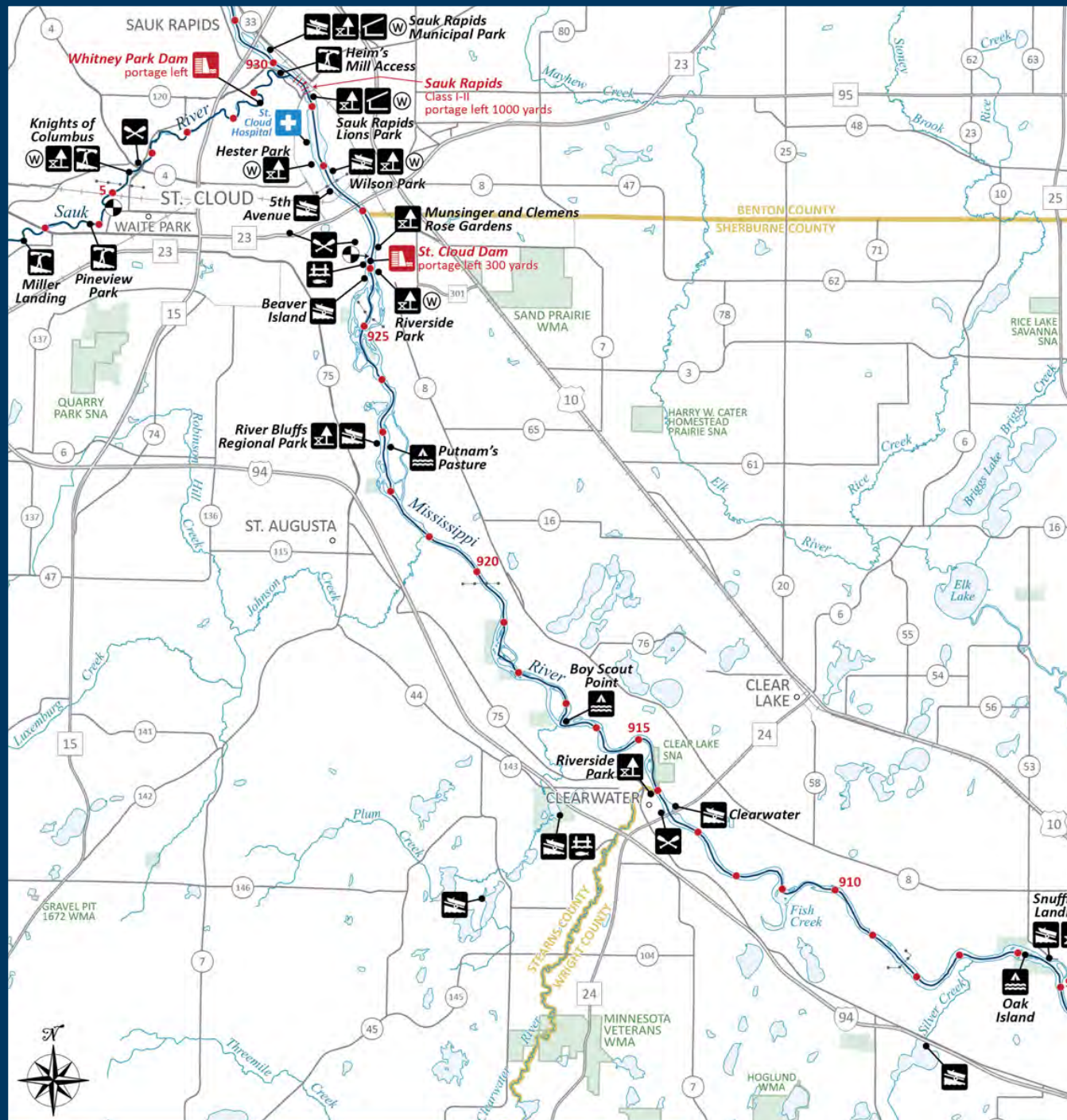
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Scale in Miles

ROUTE DESCRIPTION

River miles 966 to 925 (41 miles)

- (R) and (L) are right and left banks of the river when facing downstream.
Red text indicates caution areas.
- Continued on Map 6: Mississippi River State Water Trail Brainerd to Little Falls*
- 965.6 LeBourget Park/4th Ave. Landings. Accesses are on both sides of the river.
 - 965.2 **Little Falls Dam:** Portage left 325 yards.
 - 965.1 (L) Little Falls Dam: Carry-in access and shorefishing.
 - 964.8 (R) Mill Park: Shorefishing and historical site.
 - 964-963.1 (R) Charles A. Lindbergh State Park: Camping, rest areas, trailer access and drinking water.
 - 963.3 (R) Pike Creek Landing: Trailer access.
 - 961 (R) Swan River confluence.
 - 956.3 (R) **Blanchard Dam:** Rapids downstream. Portage left 600 yards.
 - 954.9 (L) McDougall Homestead: Built in the mid-19th century.
 - 953.6 (L) Royalton Sportsman's Club: Trailer access, private campground (fee charged).
 - 953.3 Co. Road 26 bridge. Two Rivers Confluence (R).
 - 949.4 (R) Spunk Creek confluence.
 - 947.4 (L) Platte River confluence and private campground.
 - 944.9 Co. Road 2 bridge. Stoney Creek confluence downstream (R).
 - 942.9-941.3 (R) Stearns County Park: Trailer access, rest area, drinking water. Campsite downstream.
 - 941 (R) Walleye Road: Trailer access.
 - 937 (L) Little Rock Lake. Public access upstream.
 - 933.8 (L) Sartell: Trailer access.
 - 932.3 (R) Sartell Linear Park.
 - 932.2 **Sartell Dam:** Portage right 300 yards. Watab River confluence downstream (R). Veterans Park downstream (R).
 - 931.7 (R) Rotary Park: Carry-in access, fishing pier and rest area.
 - 930.1 (L) Sauk Rapids Municipal Park: Trailer access, rest area, drinking water.
 - 929.7 (R) Heim's Mill Access: Carry-in access. Sauk River confluence downstream.
 - 929.6-929.2 **Sauk Rapids:** Class I-II rapids. Portage left 1000 yards.
 - 929.2 (L) Sauk Rapids Lions Park: rest area, drinking water.
 - 928.1 (R) Hester Park: Rest area, drinking water.
 - 927.9 (L) Wilson Park: Trailer access, rest area, drinking water.
 - 927.6 (R) 5th Avenue: Trailer access.
 - 926.3 (L) Munsinger and Clemens Rose Gardens: Rest area.
 - 926.1 (L) **St. Cloud Dam:** Portage left 300 yards.
 - 926 (L) Riverside Park: rest area, drinking water. Beaver Island Trail Access (trailer) downstream (R).
- Continued on Map 8: Mississippi River State Water Trail St. Cloud to Elk River*





MISSISSIPPI RIVER STATE WATER TRAIL MAP 8 - St. Cloud to Elk River

- Carry-in Access
- Trailer Access
- Rest Area
- Shelter
- Fishing Pier
- Watercraft Campsite
- Hospital/Clinic
- Dam
- Outfitters
- Drinking Water
- State Unit Boundaries
- Public Lands
- River Level Gauge
- Power Lines
- River Miles
- Rapids

Scale: 1:145,000
0 1 2 3 4 5
Scale in Miles

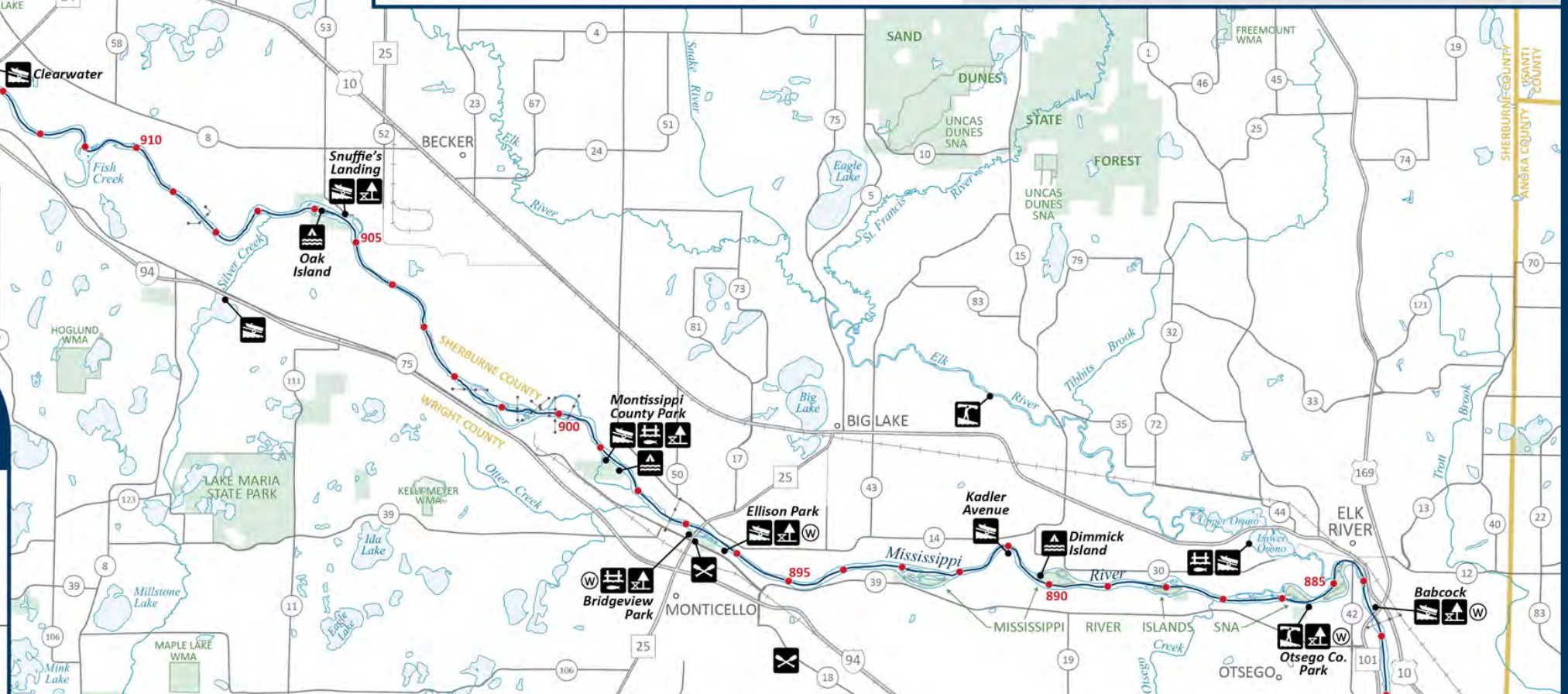
ROUTE DESCRIPTION River miles 931 to 882 (49 miles)

(R) and (L) are right and left banks of the river when facing downstream.
Red text indicates caution areas.

- 930.1 (L) Sauk Rapids Municipal Park: Trailer access, rest area, shelter, drinking water.
- 929.7 (R) Heim's Mill Access: Carry-in access. Sauk River confluence downstream.
- 929.6-929.2 **Sauk Rapids:** Class I-II rapids. Portage left 1000 yards.
- 929.2 (L) Sauk Rapids Lions Park: Rest area, shelter, drinking water.
- 928.1 (R) Hester Park: Rest area, drinking water.
- 927.9 (L) Wilson Park: Trailer access, rest area, drinking water.
- 927.6 (L) 5th Avenue: Trailer access.
- 926.3 (L) Munsinger and Clemens Rose Gardens: Rest area.
- 926.1 (L) **St. Cloud Dam:** Portage left 300 yards.
- 926 (L) Riverside Park: Rest area, drinking water.
- 925.8 (R) Beaver Island: Trailer access.
- 922.8 (R) River Bluffs Regional Park trailer access and rest area.
- 922.8 (L) Putnam's Pasture: Campsite (no fee).
- 916.6 (L) Boy Scout Point: Campsite (no fee).
- 914 (R) Confluence with Clearwater River.
- 914 (R) Riverside Park: Rest area with shelter and toilets.
- 913.7 (L) Clearwater: Trailer access. City of Clearwater.

- 913.6 MN Hwy 24 bridge.
- 906 Oak Island: Campsite (no fee).
- 905.5 (L) Snuffies Landing: Trailer access, rest area. City of Becker.
- 899-898.4 (R) Montissippi County Park: Trailer access, fishing pier, rest area with picnic facilities, toilets, campsite (no fee).
- 896.9 (R) Bridgeview Park: Campsite (by permission only), rest area with picnic facilities, fishing pier, drinking water, toilets. City of Monticello.
- 896.2 (R) Ellison Park: Trailer access, rest area with picnic facilities, drinking water, toilets.
- 893-884.5 Mississippi River Islands SNA.
- 891 (R) Kadler Avenue: Trailer access.
- 890.2 (L) Dimmick Island: Campsite (no fee).
- 885.6 (R) Otsego County Park: Carry-in access, rest area with picnic facilities, drinking water, toilets.
- 883.4 (L) Babcock: Trailer access, rest area with picnic facilities, drinking water, toilets.

**Continued on Map 9: Mississippi River State Water Trail
Elk River to St. Anthony Falls**



MISSISSIPPI RIVER STATE WATER TRAIL
MAP 9 - Elk River to Minneapolis

Carry-in Access

Trailer Access

Rest Area

Fishing Pier

Shorefishing

Watercraft Campsite

Restrooms

Point of Interest

Outfitter

Dam

Drinking Water

DNR Facility Boundaries

Public Lands

Rapids

River Level Gauge

River Miles

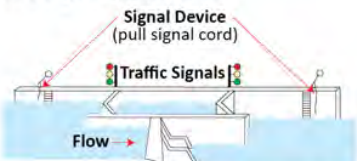
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0 1 2 3 4 5

Scale in Miles

Procedure for Using Navigational Locks

1. Lockage Signals



Traffic signals inform the boater of the lock's status. Signal for entrance to the lock by pulling the cord on the guide walls.

2. Traffic Signals

- Red Light
- Do not approach
- Yellow Light
- Approach lock
- Green Light
- Enter lock

No Light

Lock in use, approach guide wall and signal for lockage

3. Locking Through



Wait for the lockmaster's signal before entering. Proceed into lock and move towards the mooring lines spaced along the lock wall. The lines should be held by hand. Remain seated and keep hands inside the boat to avoid the chance of injury. Once the doors open, proceed forward.

ROUTE DESCRIPTION

River miles 886 to 851 (35 miles)

(R) and (L) are right and left banks of the river when facing downstream.

Red text indicates caution areas.

Continued on Map 8: Mississippi River State Water Trail - St. Cloud to Elk River

- 893-887.8

Mississippi River Islands SNA.
- 885.5 (R)

Otsego Co. Park: Carry-in access, rest area with picnic facilities, drinking water, toilets.
- 883.5 (L)

Babcock: Trailer access, rest area with picnic facilities, drinking water, toilets.
- 879.6 (R)

Dayton: Trailer access. North Fork Crow River confluence.
- 878.9 (L)

Roadside Park: Carry-in access, rest area, drinking water.
- 875.9 (L)

Mississippi W. Regional Park: Trailer access.
- 875.8-875

Foster Island/Cloquet Island: 3 campsites accessible by river only (no fee).
- 873.4 (R)

Donie Galloway Riverside Park: Rest area.
- 873.3 (L)

Mississippi River Community Park: Rest area.
- 871.4 (L)

Rum River Confluence.

- 871.4 (L)

Peninsula Point Park: Trailer access, rest area with picnic shelter, restrooms, drinking water.
- 871.1 (R)

Mississippi Point Park: Trailer access, rest area, fishing pier.
- 866.4 (L)

Coon Rapids Dam Regional Park: Trailer access, rest area, restrooms.
- 866.2 (R)

Mississippi Gateway Regional Park: Rest area.
- 866.2

Coon Rapids Dam: portage left 400 yards.
- 862.9 (R)

River Park: Trailer access, rest area, restrooms.
- 861.9 (L)

Manomin Park: Carry-in access, rest area with picnic facilities, restrooms. Rice Creek confluence.
- 861.5-860.7

Islands of Peace Park: Rest area with picnic facilities, restrooms.
- 861-860.5

Durnam Island Rapids: Class I Rapids. Rest area (R).
- 860.3 (L)

Riverfront Regional Park: Trailer access, rest area, restrooms.
- 858.5 (R)

Kroening Interpretive Center: Carry-in access.
- 860.4-857.6 (R)

North Mississippi Regional Park: Trailer access, rest area, drinking water.
- 857.8 (R)

Shingle Creek confluence.
- 855-853.5

St. Anthony Falls Historic District (see inset).
- 854.9 (L)

Boom Island Park: Water access, rest area with picnic facilities, shorefishing, drinking water, restrooms.
- 854.8 (R)

Bassett Creek: Carry-in access. Bassett Creek confluence.
- 854.6-854.1

Nicollet Island. Main channel runs right. Caution: The left channel takes you within 50 feet of the upper falls. STAY AWAY!
- 854.4-853.1 (R)

Portage around lock and dam closures, 1.5 miles. Take out at Flagpole Plaza, and put in at Bohemian Flats (see inset).
- 854

Upper St. Anthony Falls lock and dam: Permanently Closed. Exit the river upstream of the lock.
- 853.7

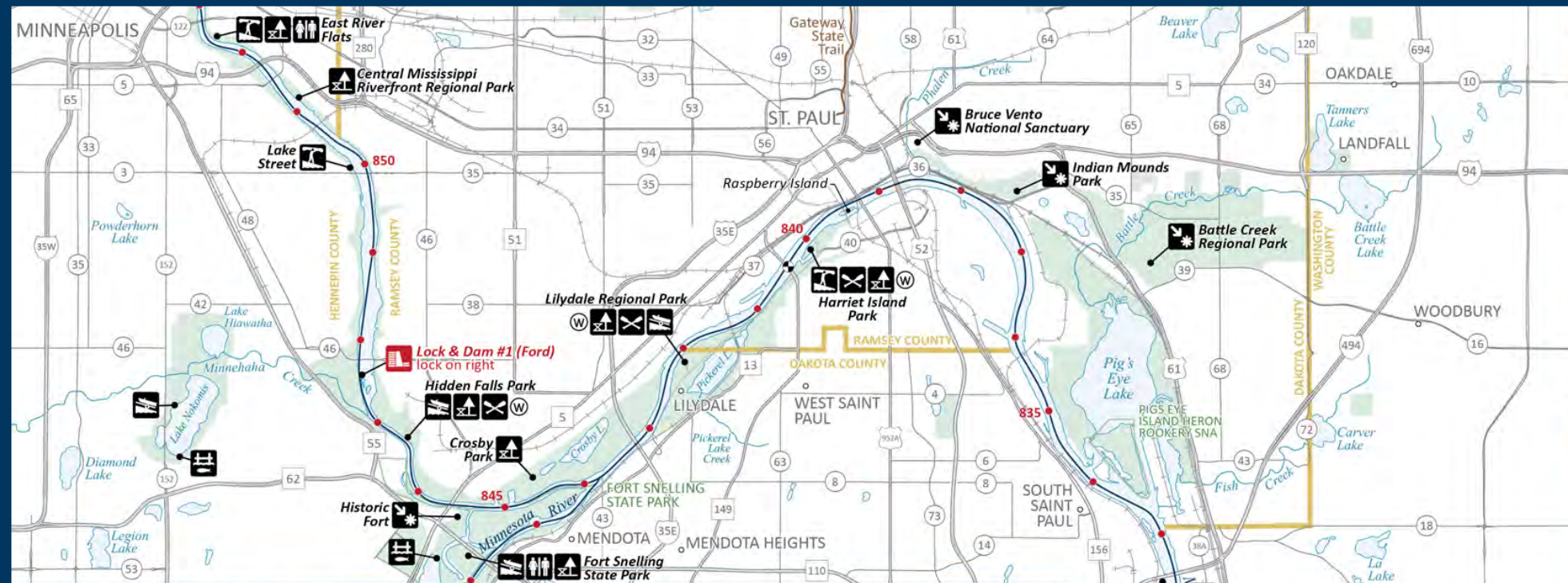
Stone Arch Bridge: Second oldest railroad bridge on the Mississippi River.
- 853.5

Lower St. Anthony Falls Dam: Lock is on right.
- 853.1 (R)

Bohemian Flats: Carry-in access, rest area, drinking water, restrooms.
- 852.5 (L)

East River Flats: Carry-in access, rest area, restrooms.

Continued on Map 10: Mississippi River State Water Trail - Minneapolis to Hastings



MISSISSIPPI RIVER STATE WATER TRAIL

MAP 10 - Minneapolis to Hastings

Carry-in Access

Trailer Access

Rest Area

Fishing Pier

Shorefishing

Watercraft Campsite

Restrooms

Point of Interest

Outfitter

Dam

Drinking Water

DNR Facility Boundaries

Public Lands

Hazards

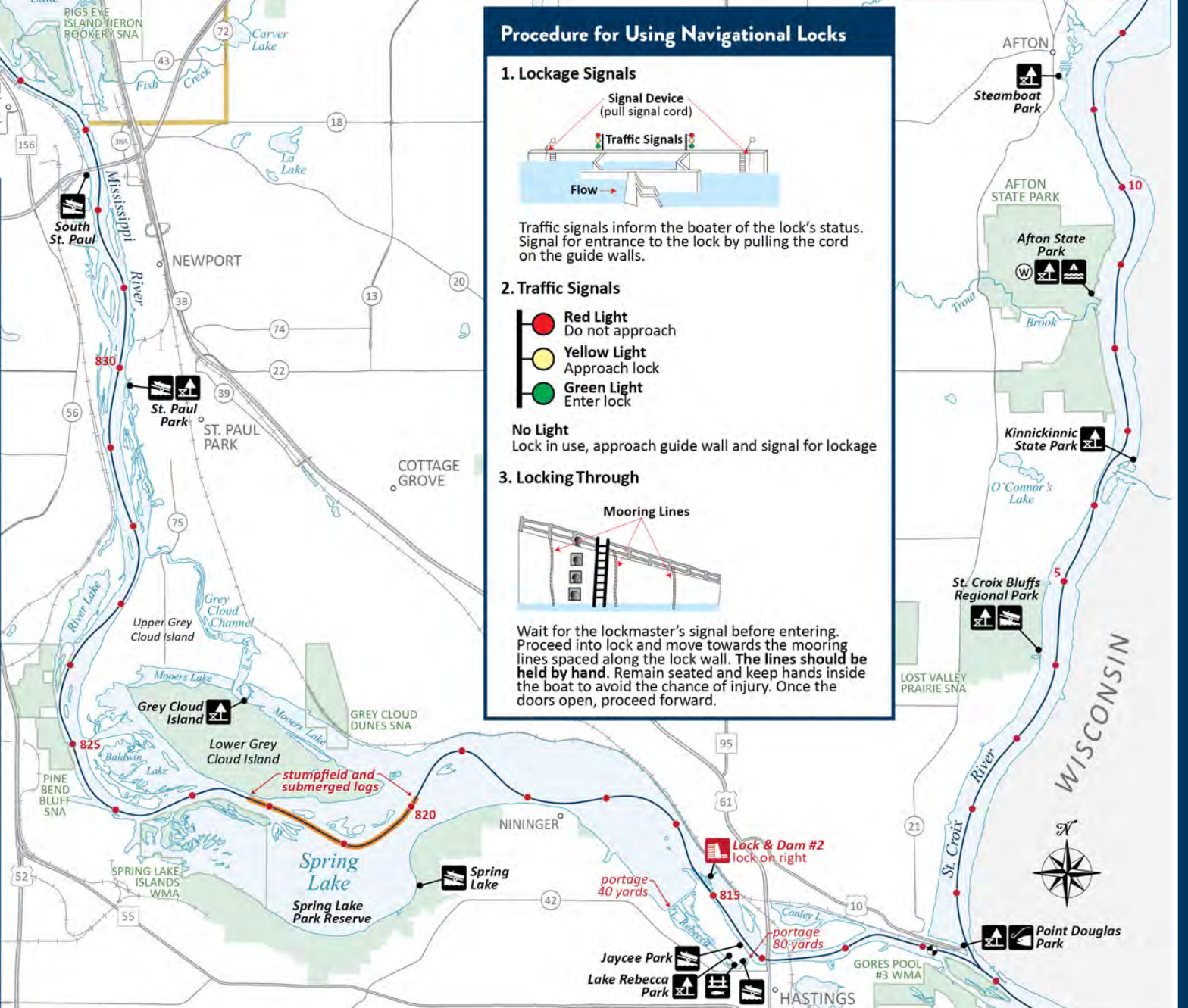
River Level Gauge

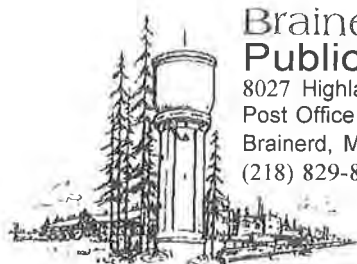
River Miles

Scale: 1:100,000

Scale in Miles

ROUTE DESCRIPTION		
River miles 852 to 811 (41 miles)		
(R) and (L) are right and left banks of the river when facing downstream.		
Red text indicates caution areas.		
Continued on Map 9: Mississippi River State Water Trail - Elk River to Minneapolis		
852.5 (L)	East River Flats: Carry-in access, rest area, restrooms.	
851.1 (L)	Central Mississippi Riverfront Regional Park: Rest area.	
850 (R)	Lake Street: Carry-in access.	
847.5	Lock & Dam #1 (Ford): lock on right.	
846.6 (L)	Hidden Falls Park: Trailer access, rest area, drinking water.	
845.5 (R)	Historic Fort Snelling: Take out at Pike Island.	
846-843.8 (R)	Fort Snelling State Park: Trailer access, restrooms, rest area. Minnesota River confluence.	
844.5 (L)	Crosby Farm Regional Park: Rest area.	
842.1 (R)	Lilydale Regional Park: Trailer access, rest area, drinking water.	
841.3	Railroad bridge. From here to beyond Pig's Eye Lake the river is industrial and urban. Barge traffic is heavy.	
840.1	Harriet Island Park: Carry-in access, rest area and drinking water.	
839.4	Raspberry Island. Wabasha Street bridge.	
838.5 (L)	Bruce Vento National Sanctuary.	
837.7 (L)	Indian Mounds Park: high on the bluffs.	
837-833.5	Battle Creek Regional Park on left.	
834.2-833.2 (L)	Pigs Eye Island Heron Rookery SNA.	
833.2 (L)	Pig's Eye Lake and barge fleeting area. Pig's Eye Lake is a 500-acre flood plain lake and is the largest rocky for black-crowned night herons in the country.	
832.5 (R)	South St. Paul: Trailer access.	
829.8 (L)	St. Paul Park: Trailer access, rest area.	
829.6-828 (L)	Complex of small islands: Alternate channel.	
827.6-825 (L)	Upper Grey Cloud Island on the left.	
826.2-824.6 (R)	Pine Bend Bluff SNA.	
825 (L)	Alternate channel leads to Baldwin and Mooers lakes. This route leads to the lower end of Lower Grey Cloud Island. Rest area located on north side of Lower Gray Cloud Island.	
823.7-822 (R)	Spring Lake Islands WMA.	
823.3-819.8	Spring Lake: A stump-choked lake that became part of the river when Lock and Dam 2 was constructed. Caution: stumpfield and submerged logs.	
821.8 (R)	Spring Lake Park Reserve.	
820.2 (R)	Spring Lake: Trailer access (shallow launch).	
817.5 (R)	Town of Nininger.	
815.3-814	Lock and Dam 2: Lock on right. To get to Lake Rebecca Park, portage 40 yards (R). To re-enter the river downstream of the lock and dam, portage 80 yards.	
814.2 (R)	Jaycee Park/Lake Rebecca Park: Trailer access, rest area, fishing pier (in Lake Rebecca) and parking.	
813.7 (R)	City of Hastings.	
812-810.7	Gores Pool #3 WMA.	
811.5 (L)	Point Douglas Park: Rest area, shorefishing.	
811.3 (L)	St. Croix River confluence.	
Continued on Mississippi River Guide - Hastings to Iowa		





**Brainerd
Public Utilities**
8027 Highland Scenic Road
Post Office Box 373
Brainerd, MN 56401-0373
(218) 829-8726 • www.bpu.org

March 21, 2016

Federal Energy Regulatory Commission
Office of the Secretary
888 Frist Street NE, RM1A
Washington DC 20426

Attn: Kimberly D. Bose
Secretary

Subject: AMJET Turbine Application - Brainerd Public Utilities
FERC Non-Capacity License Amendment Application: Supplemental Information: Minnesota
Pollution Control Agency 401 Certification
Docket Number – P-2533-006
Accession No.: 200150805-534

Dear Ms. Bose:

In regards to the above referenced application to the Federal Regulatory Commission (FERC), Brainerd Public Utilities (BPU) contacted the Minnesota Pollution Control Agency (MPCA) and requested a 401 Certification for the proposed project. The response letter from MPCA (Attachment 1), the original project 401 Certification (Attachment 2), and the recently received US Army Corps. of Engineers 404 Section 10 Certification (Attachment 3) are included as supplemental information to the FERC Application.

MPCA has concluded that the original 401 Certification remains in effect and the BPU does not need a new 401 Certification for the proposed project. Therefore, we request that FERC consider the attached supplemental information and resume review of the application.

If you have any questions, please contact me at (218) 825-3213 or SMagnuson@bpu.org. Thank you for your continued support and assistance regarding this Project.

Sincerely,

Brainerd Public Utilities

A handwritten signature in black ink, appearing to read 'Scott Magnuson', is written over the company name.

Scott Magnuson
Superintendent

Enclosure: Attachment 1 Response from Minnesota Pollution Control Agency Regarding 401
Certification Request
Attachment 2 Copy of Existing 401 Certification October 20, 1992
Attachment 3 Copy of 404 Section 10 US Army Corp of Engineers
cc: Paul Roos, AMJET Turbine Systems LLC
Norman Bishop, Knight Piésold and Co.

Attachment 1

Response from Minnesota Pollution Control Agency Regarding 401 Certification Request



Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

800-657-3864 | Use your preferred relay service | info.pca@state.mn.us | Equal Opportunity Employer

March 18, 2016

Mr. Scott Magnuson
Superintendent, Brainerd Public Utilities
8027 Highland Scenic Road
PO Box 373
Brainerd, MN 56401-0373

RE: Brainerd Public Utilities AMJET Turbine Application, FERC Non-Capacity License Amendment,
Docket Number P-2533-006

Dear Mr. Magnuson:

This letter is submitted by the Minnesota Pollution Control Agency (MPCA) under authority of Section 401 of the Clean Water Act (CWA) (33 USC 1251 et seq.), Minn. Stat. chs. 115 and 116, and Minn. R. 7001.1400-7001.1470, 7050, 7052, and 7053.

On March 10, 2016, Brainerd Public Utilities (BPU) requested a Section 401 Certification from the MPCA for a Non-Capacity License Amendment to existing FERC License #2533-006. The MPCA has reviewed the information provided, including the existing FERC license and the application materials for the Non-Capacity License Amendment.

The Brainerd Hydroelectric project was originally proposed by and licensed to Potlatch Corporation; BPU acquired the license on March 13, 2014, and agreed to accept all of the terms and conditions of the license and be bound by the license as if it were the original licensee. The MPCA views the original Section 401 Certification as part of the terms and conditions of the original license.

On June 26, 1989, in a letter from Timothy K. Scherkenbach, Director of the Division of Water Quality, the MPCA indicated that the Brainerd Hydroelectric project would be considered certified provided that a formal operating plan was submitted to address the water quality concerns during emergency, repair, or other unusual flow conditions. That operating plan was submitted in February 1991, with interagency discussions in April 1991, and a final Plan of Operation was submitted on October 24, 1991. On October 20, 1992, the MPCA, in a letter from Duane L. Anderson, Manager, Assessment and Planning Section in the Water Quality Division, notified then-owner Potlatch Corporation that the Plan of Operation was approved and the project was certified.

Based on the information you provided on March 10, 2016, stating that there will be no significant structural changes for the installation of the new turbine unit, no change to the dam or reservoir, and no changes to the existing operations of the project, the MPCA believes that the original Section 401 Certification for this project remains in effect and BPU does not need a new Section 401 Certification.

Mr. Scott Magnuson

Page 2

March 18, 2016

A Section 401 certification does not release the applicant from obtaining all necessary federal, state and local permits, nor does it limit more restrictive requirements set through any such program. It does not eliminate, waive or vary the applicant's obligation to comply with all state water statutes and rules through the construction, installation and operation of the project, including, but not limited to, the National Pollution Discharge Elimination System, State Disposal System permitting program, and Minn. R. 7050.

This MPCA's decision is made, in part, on the applicant's representations that environmental review under the Minnesota Environmental Quality Board's Rules, Minn. R. ch. 4410, is not needed for the project or, alternatively, that all necessary environmental reviews and related decisions have been completed. If environmental review for this project is needed and has not been completed, this MPCA Certification decision is null and void and of no legal effect. In that situation, MPCA reserves the right to make a Section 401 decision when the environmental review process is completed.

This letter does not release the applicant from any liability, penalty or duty imposed by Minnesota or federal statutes, regulations, rules or local ordinances and it does not convey a property right or an exclusive privilege. If you have any questions or require additional information regarding this certification, please contact me at 651-757-2607.

Sincerely,



Catherine Neuschler
Supervisor, Agency Rules Unit
Environment and Energy Section
Resource Management and Assistance Division

CN:je

cc: Catherine Schumacher, Knight Piesold

Attachment 2

Copy of Existing 401 Certification October 20, 1992



NOV 18 1992

Minnesota Pollution Control Agency

Celebrating our 25th anniversary and the 20th anniversary of the Clean Water Act

CRP

OCT 23 1992

October 20, 1992

RECEIVED

JAN 11 1993

T. G. PALKIE

CC TGP

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Charles R. Pottenger
Vice President and General Manager
Potlatch Corporation - Northwest Paper Division
207 Avenue C
Post Office Box 510
Cloquet, Minnesota 55720

Dear Mr. Pottenger:

RE: Potlatch Corporation
Brainerd Hydroelectric Project
Mississippi River
FERC Project # 2533

This letter is in response to Mead & Hunt's letter of October 24, 1991, requesting Section 401 water quality certification for the project referenced above. In a letter dated June 5, 1989, Mead & Hunt requested the Clean Water Act Section 401 water quality certification for the same project and the Minnesota Pollution Control Agency (MPCA) responded on June 26, 1989.

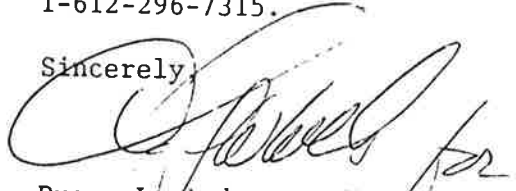
At that time, the MPCA certified the Brainerd Hydroelectric Project with the condition that a formal operating plan, addressing water quality concerns during emergencies, repair, and other unusual flow conditions, would be developed and submitted to the Minnesota Department of Natural Resources (MDNR). This certification applied only to the hydroelectric facility discharge and did not affect other permits required for the Potlatch Corporation at its Brainerd facility.

A Plan of Operation was developed for the Brainerd plant and was submitted to the MPCA in February 1991. This plan was reviewed and the MPCA determined that the conditions set forth in the Section 401 certification were met. Therefore, the 401 water quality certification stands as issued by the MPCA.

October 20, 1992
Mr. Charles R. Pottenger
Page 2

If you have any questions on this, please call Judy Bostrom either through the MPCA's toll-free telephone number (1-800-657-3864) or directly at 1-612-296-7315.

Sincerely,

A handwritten signature in dark ink, appearing to read "Duane L. Anderson", is written over the word "Sincerely,".

Duane L. Anderson, Manager
Assessment and Planning Section
Water Quality Division

DLA:ls

cc: Mr. Milo Anderson, U.S. Environmental Protection Agency, Chicago
Ms. Lois Cashell, Federal Energy Regulatory Commission
Mr. Turre Sandstrom, Potlatch Corporation, Cloquet

Attachment 3

Copy of 404 Section 10 US Army Corp of Engineers



DEPARTMENT OF THE ARMY
ST. PAUL DISTRICT, CORPS OF ENGINEERS
180 FIFTH STREET EAST, SUITE 700
ST. PAUL MN 55101-1678

MAR 7 2016

REPLY TO
ATTENTION OF

Operations
Regulatory (2013-00480-RQM)

Mr. Scott Magnuson
Brainerd Public Utilities
8027 Highland Scenic Road
Baxter, Minnesota 56425

Dear Mr. Magnuson:

We have reviewed information about your permit application to install a 516 sq. ft. test generator in the Mississippi River at the Wausau Paper Mills Dam as depicted in the attached drawing labeled 2013-00480-RQM one of one. The project site is in Sec. 18, T. 45 N., R. 30 E., Crow Wing County, Minnesota.

Department of the Army Regional General Permit-003-MN (RGP-003-MN) provides authorization under section 404 of the Clean Water Act for certain categories of activities involving the discharge of dredged or fill material into waters of the U.S. or activities conducted in/over/under waters covered by Section 10 of the Rivers and Harbors Act. We have determined that the described work is authorized by RGP-003-MN category O, provided the attached Standard Conditions are followed.

This determination covers only the project as described above. If the design, location, or purpose of the project is changed, our office should be contacted to make sure the work would not result in a violation of Federal law.

If your project will require off-site fill material that is **not** obtained from a licensed commercial facility, you must notify us at least five working days before start of work. A cultural resources survey may be required if a licensed commercial facility is not used.

This General Permit is valid until January 31, 2017, unless modified, reissued, or revoked. The time limit for completing the work described above ends on that day. It is the permittee's responsibility to remain informed of changes to the General Permit program. If this authorized work is not undertaken within the above time period, or the project specifications have changed, our office must be contacted to determine the need for further approval or re-verification.

It is the permittee's responsibility to ensure that the work complies with the terms of this letter and any enclosures, AND THAT ALL REQUIRED STATE AND LOCAL PERMITS AND APPROVALS ARE OBTAINED BEFORE WORK PROCEEDS.

Operations
Regulatory (2013-00480-RQM)

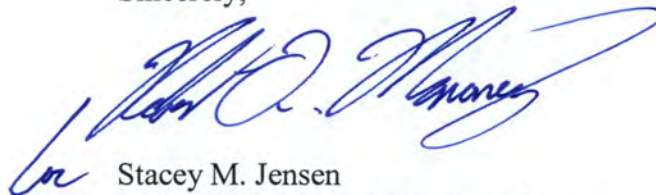
- 2 -

A preliminary jurisdictional determination (JD) has been prepared for the site of your project. The preliminary JD is not appealable. If you wish, you may request an approved JD (which may be appealed), by contacting the Corps representative identified in the final paragraph of this letter. You also may provide new information for further consideration by the Corps to reevaluate the JD. If this JD is acceptable, please sign and date both copies of the Preliminary Jurisdictional Determination Form and return one copy to the address below within 15 days from the date of this letter.

U.S. Army Corps of Engineers
St. Paul District
180 5th Street East, Suite 700
St. Paul, Minnesota 55101-1678
Attn: project manager

If you have any questions, contact **Rob Maroney** in our Brainerd field office at (651) 290-5766. In any correspondence or inquiries, please refer to the Regulatory number shown above.

Sincerely,



Stacey M. Jensen
Acting Chief, Regulatory Branch

Enclosure:
2013-00480-RQM one of one





U.S. Army Corps of Engineers
St. Paul District

Terms and Conditions of Regional General Permit-003-MN Activity O: Residential, Commercial, Agricultural and Institutional Developments

The following description of residential, commercial, agricultural and institutional development activities authorized under Regional General Permit-003-Minnesota (RGP-003-MN) is excerpted from RGP-003-MN. Read RGP-003-MN in its entirety at <http://www.mvp.usace.army.mil/regulatory/>. All projects authorized under RGP-003-MN must also follow the Standard Conditions of RGP-003-MN and any terms specified in the RGP-003-MN verification letter.

O. Residential, Commercial, Agricultural and Institutional Developments. Discharges of dredged or fill material in waters of the U.S. or work in Section 10 waters for a single and complete project for the construction or expansion of residential, commercial, agricultural, or institutional operations or developments that do not result in impacts to more than ½ acre of waters of the U.S. or 500 linear feet of a stream. Activities authorized include building foundations, building pads, and attendant features. Attendant features include, but are not limited to: roads, parking lots, garages, utility lines, geothermal systems, yards, storm water management facilities, culvert installation, and recreational facilities that are integral to the development.

For any development or subdivision, the aggregate total loss of waters of the U.S. authorized under this category cannot exceed ½ acre. This RGP category does not authorize maintenance dredging for the primary purpose of navigation. The disposal of excavated or dredged material into a water of the U.S. obtained from a maintenance dredging operation is not authorized under this RGP category. No new stream channelization or stream relocation work is authorized under this RGP category. **(Section 10 RHA / Section 404 CWA)**

Notification Requirements:

The project proponent must notify the District Engineer by submitting a PCN and receive

written confirmation that the project is authorized by the RGP-003-MN.

STANDARD CONDITIONS

All RGP-003-MN authorizations are subject to the following standard conditions, as applicable, in addition to any case-specific conditions imposed by the District Engineer. These conditions and any special conditions must be satisfied for any RGP authorization to be valid:

1. Mitigation/Sequencing.

Discharges of dredged or fill material into waters of the U.S. **must be minimized or avoided to the maximum extent practicable.**

When determining the least environmentally damaging practicable on-site alternative, impacts to all resources including jurisdictional waters, non-jurisdictional waters, and high quality uplands should be considered.

Mitigation in all its forms (avoiding, minimizing, or compensating) will be required to the extent necessary to ensure that the adverse effects to the aquatic environment are minimal. Compensatory mitigation requirements are determined on a case by case basis and may be required to reduce adverse effects of a project, either temporary or permanent, to the minimal level.

The District Engineer will determine appropriate compensatory mitigation requirements in accordance with Federal guidelines and established District policy.

Generally, compensatory wetland mitigation shall be required for projects that impact more than:

400 square feet in a shoreland wetland protection zone,

2,000 square feet in a "less-than-50 percent" county,

5,000 square feet in a "50% -to-80% " county, and

10,000 square feet in a "greater than 80%" county.

as shown on the attached map labeled enclosure 5:

When the above project thresholds are exceeded, the compensatory mitigation requirement applies to the project's total wetland impacts, including the threshold amounts specified above. Use of Corps-approved mitigation banks and in-lieu fee procedures are generally acceptable methods of providing compensatory mitigation for small projects having compensatory mitigation requirements of 1/4 acre or less.

Compensatory mitigation shall be designed to replace the functions lost as result of the project. Where certain functions and services of waters of the U.S. are permanently adversely affected as a result of the authorized discharge, such as the conversion of a forested or scrub-shrub wetland to a herbaceous wetland in a permanently maintained utility right of way, or are temporarily affected, such as the temporary conversion of forested or scrub-shrub wetlands in a linear project corridor, compensatory mitigation may be required to reduce the adverse effects of the project to the minimal level.

For activities where compensatory mitigation is required, project proponents should include a mitigation plan prepared in accordance with 33 CFR Part 332, and the St. Paul District Policy for Wetland Compensatory Mitigation in Minnesota (<http://www.mvp.usace.army.mil/regulatory/default.asp?pageid=924&subpageid=387>). The plan prepared should describe the measures proposed to ensure that the activity complies with the Section 404(b)(1) guidelines (40 CFR Part 230). In cases where a Corps-approved bank is proposed to be used, a statement of intent to use the bank is generally sufficient. Compensatory mitigation required by other Federal or state programs may, but will not necessarily, satisfy this Clean Water Act requirement.



U.S. Army Corps of Engineers
St. Paul District

Terms and Conditions of Regional General Permit-003-MN Activity O: Residential, Commercial, Agricultural and Institutional Developments

2. Navigation. (a) No activity may cause more than a minimal adverse effect on navigation. (b) The permittee understands and agrees that, if future operations by the United States require the removal, relocation, or other alteration, of the structure or work herein authorized, or if, in the opinion of the Secretary of the Army or authorized representative, said structure or work shall cause unreasonable obstruction to the free navigation of the navigable waters, the permittee will be required, upon due notice from the Corps of Engineers, to remove, relocate, or alter the structural work or obstructions caused thereby, without expense to the U.S. No claim shall be made against the U.S. on account of any such removal or alteration.

3. Suitable fill material. No activity may use unsuitable material (e.g., trash, debris, car bodies, unprocessed asphalt, etc.). All fill (including riprap) authorized under this RGP, must be free from toxic pollutants in toxic amounts.

4. Proper maintenance. Any authorized structure or fill shall be properly maintained, including maintenance to ensure public safety.

5. Erosion and siltation controls. Appropriate erosion and siltation controls must be used and maintained in effective operating condition during construction, and all exposed soil and other fills, as well as any work below the ordinary high water mark, must be permanently stabilized at the earliest practicable date. Work should be done in accordance with state-approved, published practices, such as defined in Minnesota Pollution Control Agency document, PROTECTING WATER QUALITY IN URBAN AREAS - BEST MANAGEMENT PRACTICES FOR MINNESOTA.

Upon completion of earthwork operations, all exposed slopes, fills, and disturbed areas must be given sufficient protection by appropriate means such as landscaping, or planting and maintaining vegetative cover, to prevent subsequent erosion.

Cofferdams shall be constructed and maintained so as to prevent erosion into the water. If earthen material is used for cofferdam construction, sheet piling, riprap or a synthetic cover must be used to prevent dam erosion.

6. Removal of temporary fills. Temporary fills are allowed to remain in place for up to three months. Upon request the District Engineer may extend this period, allowing temporary fills to remain in place for up to a total of 180 days, where appropriate.

At the end of the specified timeframe, temporary fills must be removed in their entirety and the affected areas returned to their preconstruction contours and elevation. The areas affected by temporary fills must be re-vegetated with native, non-invasive plant species, as appropriate.

7. Obstruction of high flows. To the maximum extent practicable, discharges must not permanently restrict or impede the passage of normal or expected high flows or cause the relocation of the water (unless the primary purpose of the fill is to impound waters).

8. Historic Properties, Cultural Resources. (a) No activity which may affect historic properties listed, or potentially eligible for listing, on the National Register of Historic Places is authorized, until the District Engineer has complied with the requirements of Section 106 of the National Historic Preservation Act (NHPA). Federal project proponents should follow their own procedures for complying with the requirements of Section 106, and provide documentation of compliance with those requirements. Information on the location and existence of historic resources can be obtained from the State Historic Preservation Office and the National Register of Historic Places. (b) If cultural resources, such as historic structures or buildings, or archaeological remains are identified in the project area, or are discovered during activities authorized by this permit, you must immediately stop work and notify the District Engineer of what you have

found. We will initiate the Federal and state coordination required to satisfy our responsibilities under Section 106 of the NHPA. (c) Rock or fill material used for activities authorized by this permit must either be obtained from existing quarries or, if a new borrow site is opened up to obtain fill material, the Corps must be notified prior to the use of the new site to determine whether a cultural resources survey of the site is necessary.

9. Adverse effects from impoundments. If the activity creates an impoundment of water, adverse effects on the aquatic system caused by the accelerated passage of water and/or the restriction of its flow shall be minimized to the maximum extent practicable.

10. Migratory Bird breeding areas. Activities in waters of the U.S. that serve as breeding areas for migratory birds, including waterfowl, must be avoided to the maximum extent practicable.

11. Aquatic life movements. No activity may substantially disrupt the movement of those species of aquatic life indigenous to the water body, including those species that normally migrate through the area, unless the activity's primary purpose is to impound water.

12. Spawning areas. Activities in spawning areas during spawning seasons must be avoided to the maximum extent practicable. Activities that result in the physical destruction (e.g., through excavation, fill, or downstream smothering by substantial turbidity) of an important spawning area are not authorized.

13. Equipment. Heavy equipment working in wetlands must be placed on mats, or other measures must be taken to minimize soil disturbance. Equipment should be clean and free of greases, oils, fuels, and sediments prior to working within aquatic habitats.



U.S. Army Corps of Engineers
St. Paul District

Terms and Conditions of Regional General Permit-003-MN Activity O: Residential, Commercial, Agricultural and Institutional Developments

14. Tribal rights. No activity or its operation may impair reserved tribal rights, including, but not limited to, reserved water rights and treaty fishing and hunting rights.

15. Wild and Scenic Rivers. No activity may occur in a component of the National Wild and Scenic River System, or in a river officially designated by Congress as a "study river" for possible inclusion in the system while the river is in an official study status, unless the appropriate Federal agency with direct management responsibility for such river has determined that the proposed activity will not adversely affect the Wild and Scenic River designation or study status. Information on Wild and Scenic Rivers may be obtained from the appropriate Federal land management agency in the area (e.g., National Park Service, U.S. Forest Service, Bureau of Land Management, U.S. Fish and Wildlife Service.)

16. Water quality standards. All work or discharges to a watercourse resulting from permitted construction activities, particularly hydraulic dredging, must meet applicable Federal, State, and local water quality and effluent standards on a continuing basis.

17. Preventive measures. Measures must be adopted to prevent potential pollutants from entering the watercourse. Construction materials and debris, including fuels, oil, and other liquid substances, shall not be stored in the construction area in a manner that would allow them to enter the watercourse as a result of spillage, natural runoff, or flooding. To the extent practicable and appropriate measures should be taken to control and minimize the spread of invasive species via equipment transfer.

18. Spill contingency plan. A contingency plan must be formulated that would be effective in the event of a spill. This requirement is particularly applicable in operations involving the handling of petroleum products. If a spill of any potential

pollutant should occur, it is the responsibility of the permittee to remove such material, to minimize any contamination resulting from this spill, and to immediately notify the State Duty Officer at 1-800-422-0798 and the U.S. Coast Guard at 1-800-424-8802.

19. Disposal sites. If dredged or excavated material is placed on an upland disposal site (above the ordinary high-water mark), the site must be securely diked or contained by some other acceptable method that prevents the return of potentially polluting materials to the watercourse by surface runoff or by leaching. The containment area, whether bulkhead or upland disposal site, must be fully completed prior to the placement of any dredged material.

20. Water intakes/activities. No activity may occur in the proximity of a public water supply intake, except where the activity is for repair or improvement of the public water supply intake structures or adjacent bank stabilization.

21. Endangered Species. (a) No activity is authorized which is likely to adversely affect a threatened or endangered species as identified under the Federal Endangered Species Act (ESA), or which is likely adversely affect critical habitat of such species. (b) No activity is authorized which may affect a listed species or critical habitat unless consultation under the ESA addressing the effects of the proposed activity has been completed. Non-federal permittees shall notify the District Engineer if any listed species or critical habitat might be affected or is in the vicinity of the project, and shall not begin work on the activity until notified by the District Engineer that the requirements of the ESA have been satisfied and that the activity is authorized. Federal project proponents should follow their own procedures for complying with the requirements of the ESA and provide documentation of compliance with those requirements. (c) No activity is authorized which is likely to jeopardize a proposed species or which is likely to adversely modify proposed critical

habitat. (d) Authorization of an activity under RGP-003-MN does not authorize the take of a threatened or endangered species as defined under the ESA. In the absence of separate authorization (e.g., an ESA Section 10 Permit, a Biological Opinion with incidental take provisions, etc.) from the U.S. Fish and Wildlife Service (USFWS), both lethal and non-lethal takes of protected species are in violation of the ESA. General information on the location of threatened and endangered species and their critical habitat is provided in Attachment A and Enclosures 3-7. Information can also be obtained directly from the offices of the USFWS Twin Cities Field office (TCFO) at 612-725-3548. (e) If it becomes apparent that a federally listed endangered plant or animal species will be affected by work authorized by this permit, work must be stopped immediately and the St. Paul District Corps of Engineers must be contacted for further instruction.

22. Bald and Golden Eagle Protection Act and Migratory Bird Treaty Act. Notification to the Corps is required for projects within 0.5 miles (2640 feet) of an eagle nest. There are approximately 1300 bald eagle nests distributed among 64 of Minnesota's 87 counties. In Minnesota, bald eagles typically nest in old, large diameter trees within approximately 500 feet of a water body.

It is recommended that the project proponent also contact the USFWS TCFO (612-725-3548) if the proposed project will disturb a bald eagle or a bald eagle nest. Projects involving the placement of potentially lethal infrastructure (communication towers, wind turbines, transmission lines, etc) within two miles of a bald eagle nest may warrant additional review.

For more information concerning the Bald and Golden Eagle Protection Act or the Migratory Bird Treaty Act refer to the following websites:

<http://www.fws.gov/migratorybirds/mbermits.html>



U.S. Army Corps of Engineers
St. Paul District

Terms and Conditions of Regional General Permit-003-MN Activity O: Residential, Commercial, Agricultural and Institutional Developments

<http://www.fws.gov/midwest/eagle/project/index.html>

<http://www.fws.gov/midwest/eagle/guidelines/disturbnestingbaea1.html>

23. Expiration Date. Unless otherwise specified in the District's letter confirming your project complies with the requirements of this RGP, the time limit for completing work authorized by RGP-003-MN ends upon the expiration date of this RGP-003-MN. Activities authorized under the RGP-003-MN that have commenced construction or are under contract to commence construction, will remain authorized provided the activity is completed within 12 months of the date of the RGP-003-MN expiration, suspension, or revocation; whichever is sooner. If you find that you need more time to complete the authorized activity, submit your request for a time extension to this office for consideration at least three months before the expiration date is reached.

24. Maintenance and Transfer.

You must maintain the authorized activity in good condition and in conformance with the terms and conditions of this permit. You are not relieved of this requirement if you abandon the permitted activity, although you may make a good faith transfer to a third party. Should you wish to cease to maintain the authorized activity or should you desire to abandon it without a good faith transfer, you must obtain a modification of this permit from this office, which may require restoration of the area.

25. Inspection. You must allow representatives from this office to inspect the authorized activity at any time deemed necessary to ensure that it is being or has been accomplished in accordance with the terms and conditions of RGP-003-MN.

26. State Section 401 Water

Quality Certification. The State of Minnesota Pollution Control Agency has issued a 401 certification for the RGP-003-MN. Permittees must comply with the conditions specified in

the certification as special conditions to this permit. For your convenience, a copy of the certification is attached.

27. Coastal Zone Management consistency determination. The State of Minnesota has determined that the RGP-003-MN is consistent with the CZM program.

Further Information:

1. Congressional Authorities: You have been authorized to undertake the activity described above pursuant to Section 404 of the Clean Water Act (33 U.S.C. 1344) and/or Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. 403).

2. Limits of this authorization.

- a. RGP-003-MN does not obviate the need to obtain the other Federal, state, or local authorizations required by law.
- b. RGP-003-MN does not grant any property rights or exclusive privileges.
- c. RGP-003-MN does not authorize any injury to the property or rights of others.
- d. RGP-003-MN does not authorize interference with any existing or proposed Federal project.

3. Limits of Federal Liability. In authorizing work, the Federal Government does not assume any liability, including but not limited to the following:

- a. Damages to the permitted project or uses thereof as a result of other permitted or un-permitted activities or from natural causes.
- b. Damages to the permitted project or uses thereof as a result of current or future activities undertaken by or on behalf of the United States in the public interest.
- c. Damages to persons, property, or to other permitted or un-permitted activities or structures

caused by the activity authorized by this permit.

- d. Design or construction deficiencies associated with the permitted work.
- e. Damage claims associated with any future modification, suspension, or revocation of this permit.

4. Reliance on Project Proponent's Data: The determination by this office that an activity is not contrary to the public interest will be made in reliance on the information provided by the project proponent.

5. Reevaluation of Decision. This office may reevaluate its decision on an authorization at any time the circumstances warrant. Circumstances that could require a reevaluation include, but are not limited to, the following:

- a. The permittee fails to comply with the terms and conditions of this permit.
- b. The information provided by the permittee in support of the preconstruction notification proves to have been false, incomplete, or inaccurate (see 4 above).
- c. Significant new information surfaces which this office did not consider in reaching the original public interest decision.

Such a reevaluation may result in a determination that is appropriate to use the suspension, modification, or revocation procedures contained in 33 CFR 325.7 or enforcement procedures such as those contained in 33 CFR 326.4 and 326.5. The referenced enforcement procedures provide for the issuance of an administrative order requiring the permittee to comply with the terms and conditions of the permit and for the initiation of legal action where appropriate.

6. This Office may also reevaluate its decision to issue RGP-003-MN at any time the circumstances warrant.



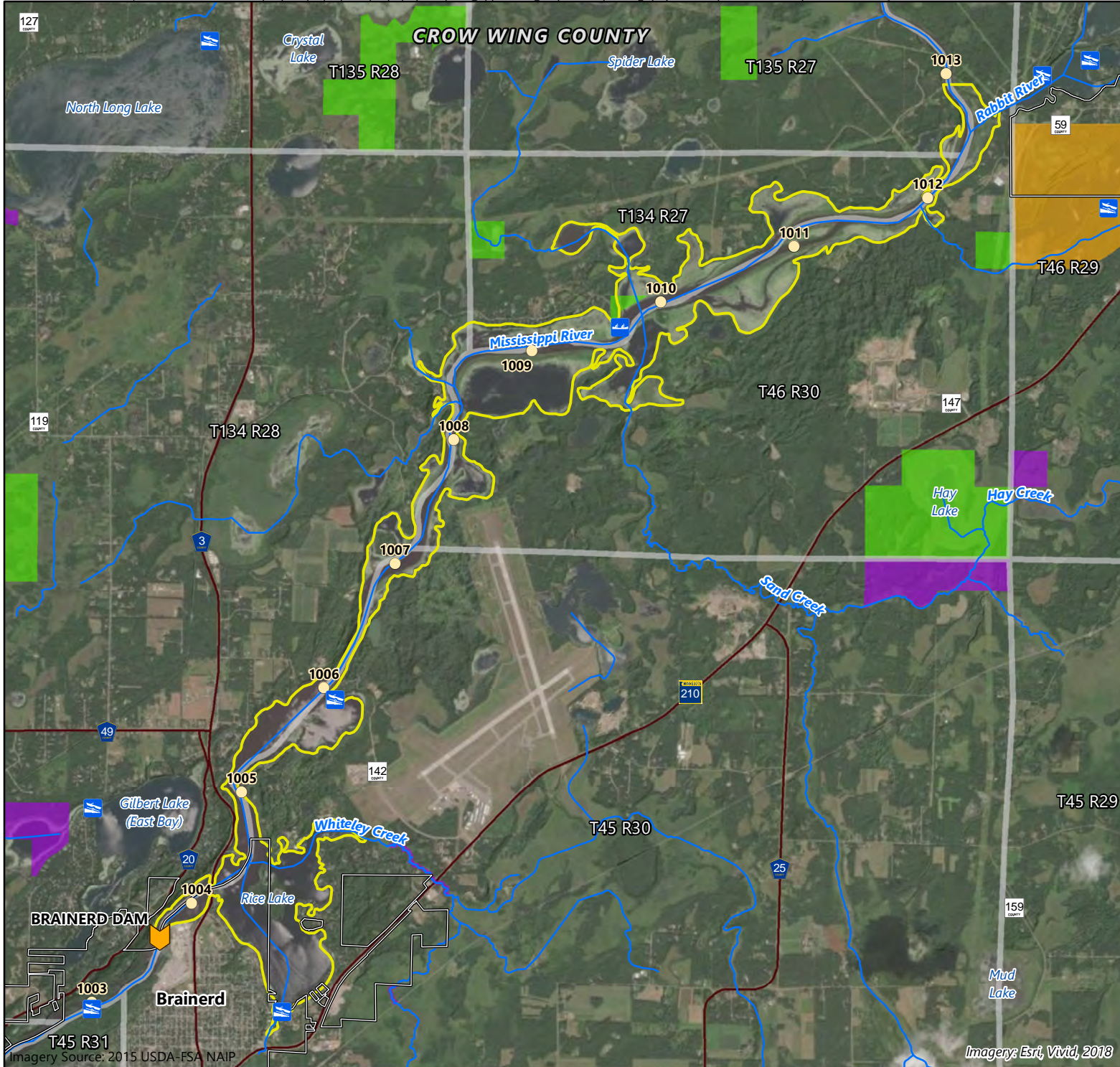
U.S. Army Corps of Engineers
St. Paul District

Terms and Conditions of Regional General Permit-003-MN Activity O: Residential, Commercial, Agricultural and Institutional Developments

Circumstances that could require a reevaluation include, but are not limited to, the following: significant new information surfaces which this office did not consider in reaching the original public interest decision. Such a reevaluation may result in a determination that is appropriate to use the suspension, modification, or revocation procedures contained in 33 CFR 325.7.

Document Content(s)

FERCLetter_401CertMPCA.PDF.....1-16



- Carry-in/Portage
 - Trailer Launch
 - River Mile Marker
 - Dam Location
 - Major Highway
 - Project Boundary
 - Corporate Limits
 - PLSS Township
- Protected Areas**
- State Trust Land
 - State Fish and Wildlife
 - State Park and Recreation

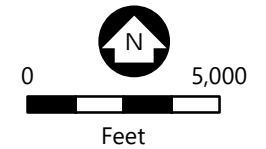
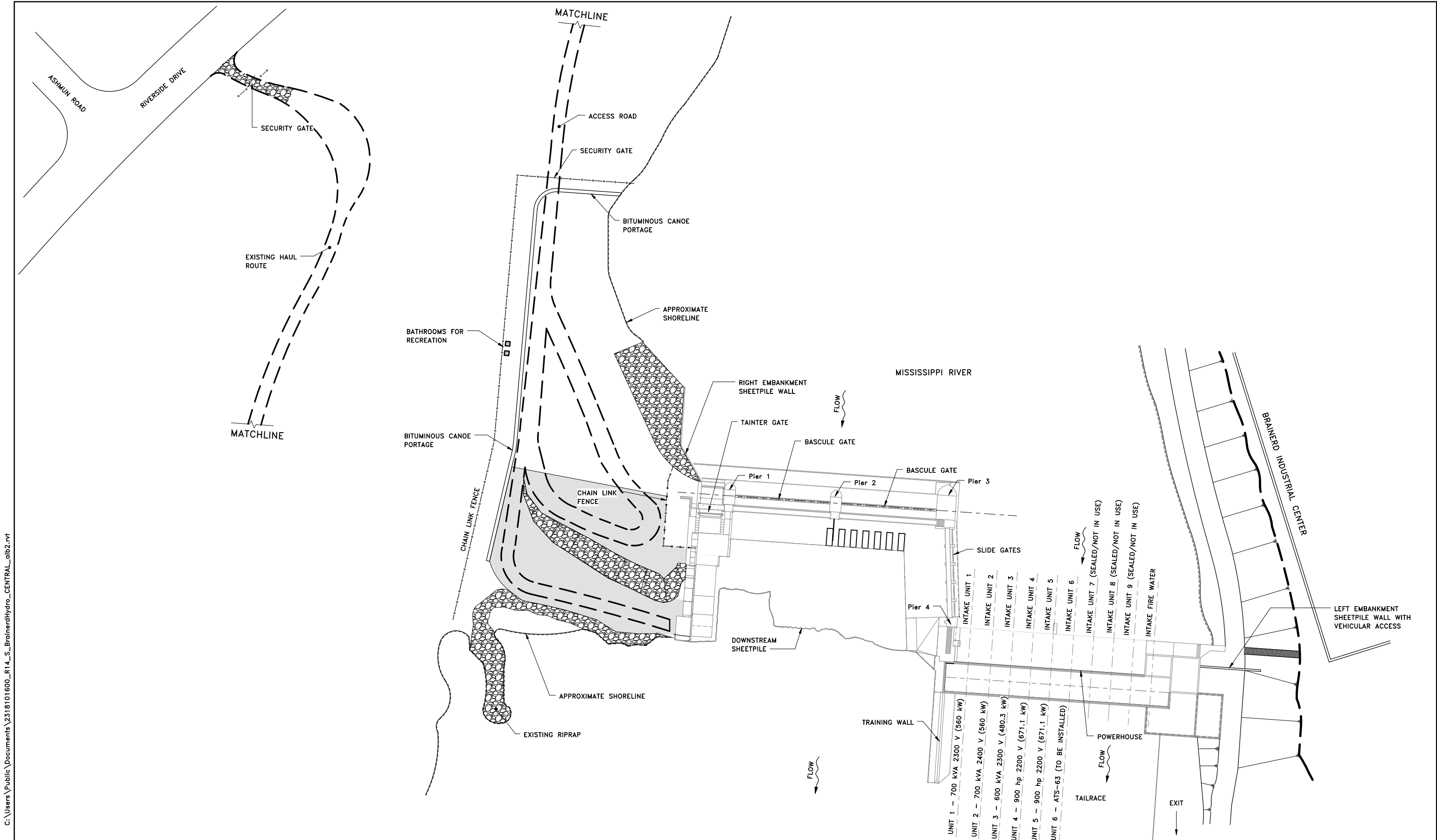


Exhibit E-3

PROJECT LOCATION
Brainerd Dam
Brainerd Public Utilities

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8/9/2018 3:27:24 PM



CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE

EXHIBIT DRAWING – NOT FOR CONSTRUCTION

				I HEREBY CERTIFY THAT THIS PLAN, SPECIFICATION, OR REPORT WAS PREPARED BY ME OR UNDER MY DIRECT SUPERVISION AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF MINNESOTA.				CLIENT BID CONSTRUCTION RECORD				 Project Office: BARR ENGINEERING CO. 4300 MARKETPOINTE DRIVE SUITE 200 MINNEAPOLIS, MN 55435 Ph: 1-800-225-1966 Fax: (218) 262-3460 www.barr.com				Scale Date Drawn Checked Designed Approved				BRAINERD PUBLIC UTILITIES BRAINERD, MINNESOTA				BRAINERD HYDROELECTRIC PROJECT BRAINERD, MINNESOTA				BARR PROJECT NO. 23/18-1016.05			
				PRINTED NAME ADELE L. BRAUN																				CLIENT PROJECT NO. ---							
				SIGNATURE 																				DWG NO. G-06				REV NO.			
				DATE _____ LICENSE # 49586																											
								RELEASED TO/FOR				A B C 0 1 2 3																			
												DATE RELEASED																			

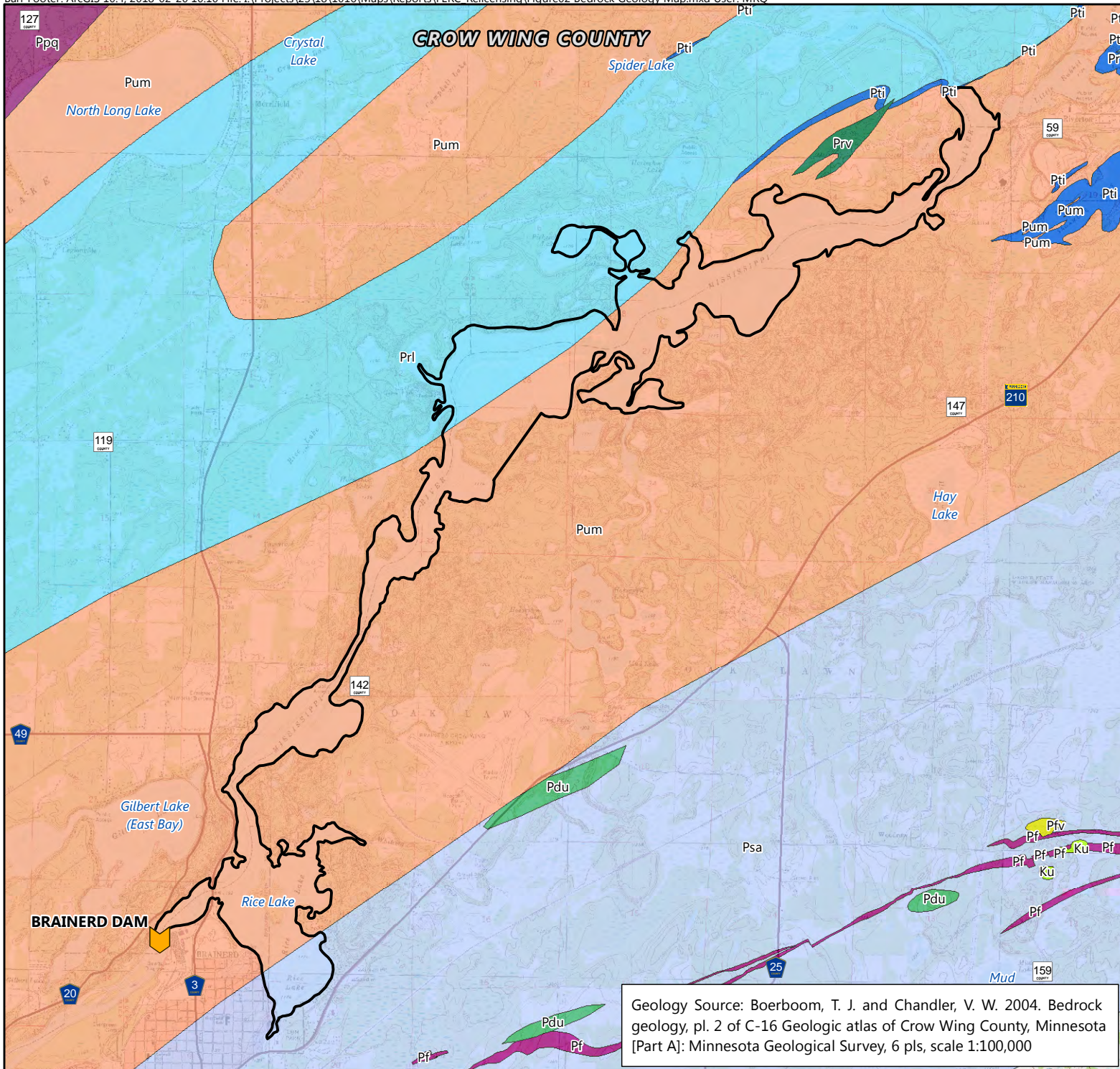
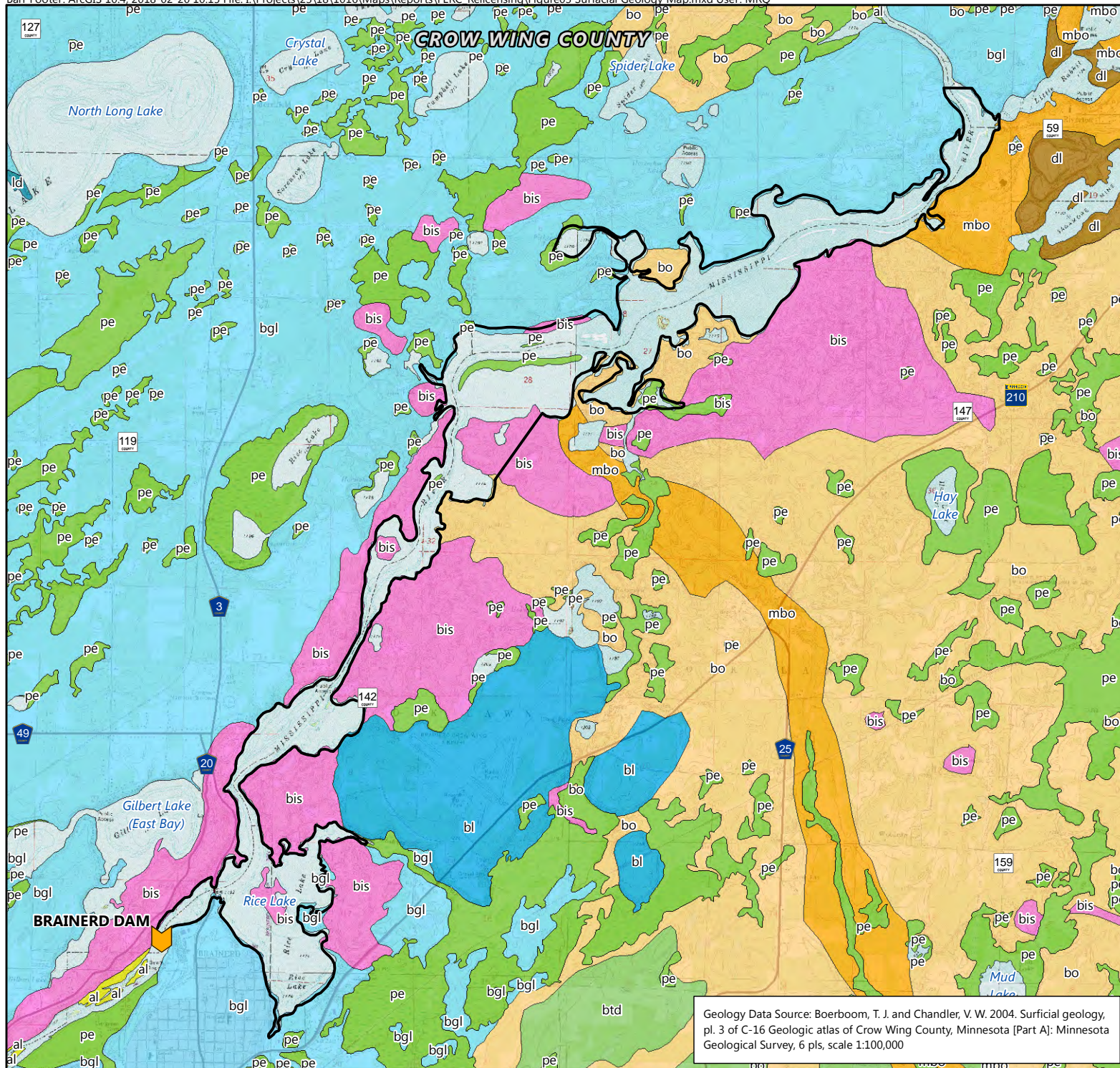


Figure 1



- Dam Location
- Project Boundary
- Major Highway
- Geologic Unit**
- Holocene and Late Pleistocene**
 - al - Floodplain alluvium
 - dl - Land disturbed by iron-ore mining
 - ld - Lacustrine sediments
 - pe - Peat and other organic sediments
- Pleistocene**
- Mille Lacs Deposits of the Cromwell Formation**
 - mbo - Mixed outwash
- Brainerd Assemblage**
 - bgl - Glacial Lake Brainerd deposits
 - bis - Ice-contact stratified materials
 - bl - Lake sand and silt
 - bo - Outwash
 - btd - South Long Lake till deposits

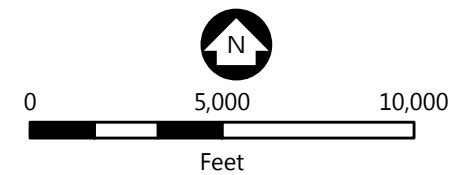
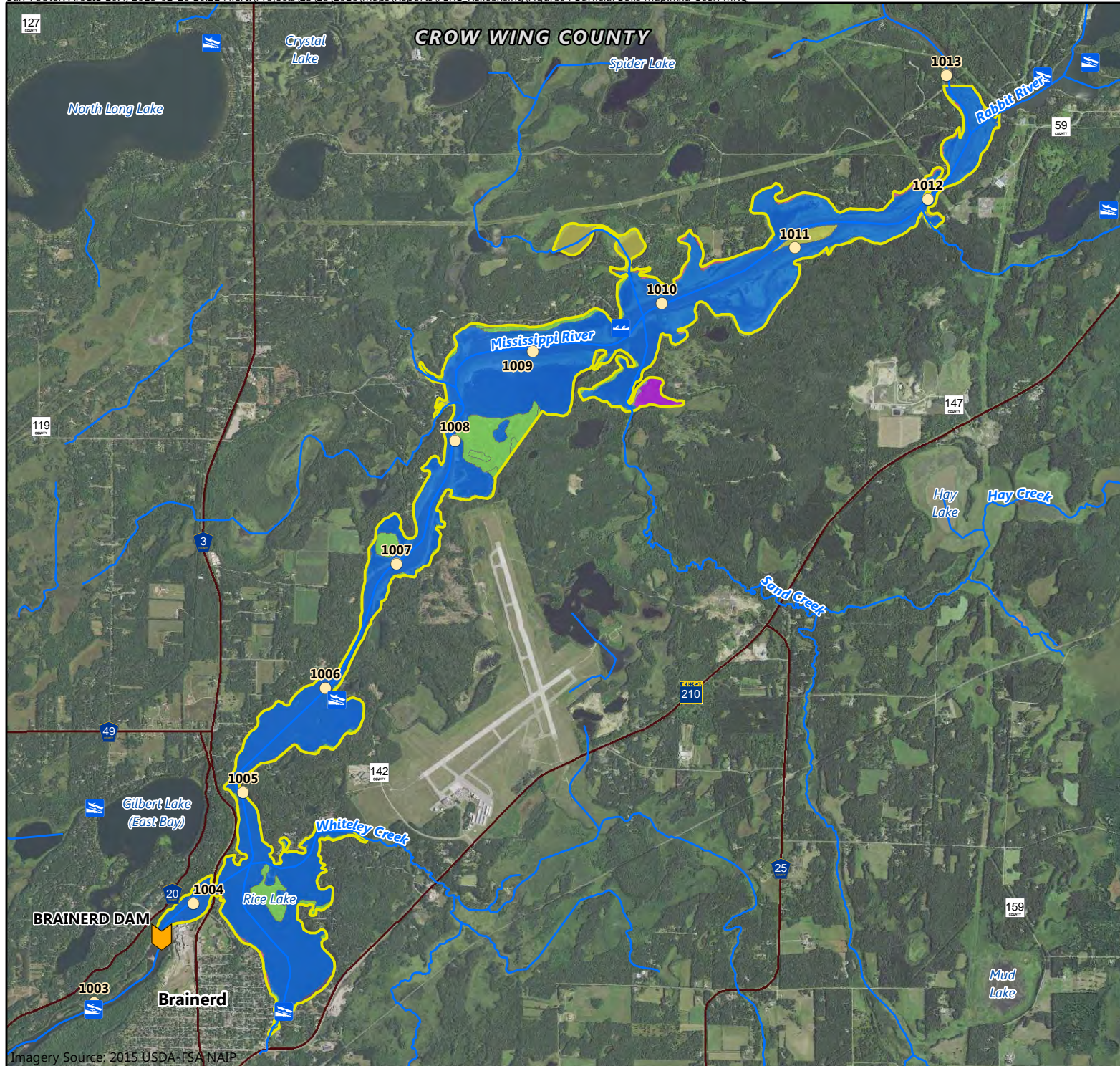


Figure 2

SURFICIAL GEOLOGY
Brainerd Dam
 Brainerd Public Utilities
 Exhibit E-5

Geology Data Source: Boerboom, T. J. and Chandler, V. W. 2004. Surficial geology, pl. 3 of C-16 Geologic atlas of Crow Wing County, Minnesota [Part A]: Minnesota Geological Survey, 6 pls, scale 1:100,000



- River Mile Marker
- Dam Location
- Project Boundary
- Major Highway
- Map Unit Name
- Emmert-Gerrish complex
- Eutrudepts-Graycalm-Rollins complex
- Gerrish-Mahtomedi complex
- Graycalm loamy sand
- Graycalm-Grayling complex
- Graycalm-Grayling-Meehan complex
- Lougee-Barber-Guida complex
- Lougee-Totagatic-Bowstring complex
- Rifle and Seelyeville soils
- Rosholt-Chetek complex
- Uskabwanka-Rifle-Lougee complex
- Water
- Wurtsmith-Meehan complex
- Wurtsmith-Meehan-Beach complex
- Zimmerman loamy fine sand
- Zimmerman-Urban land complex

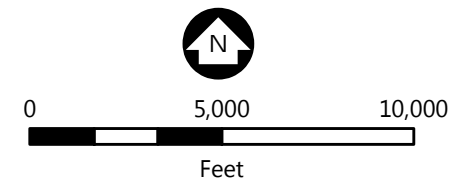
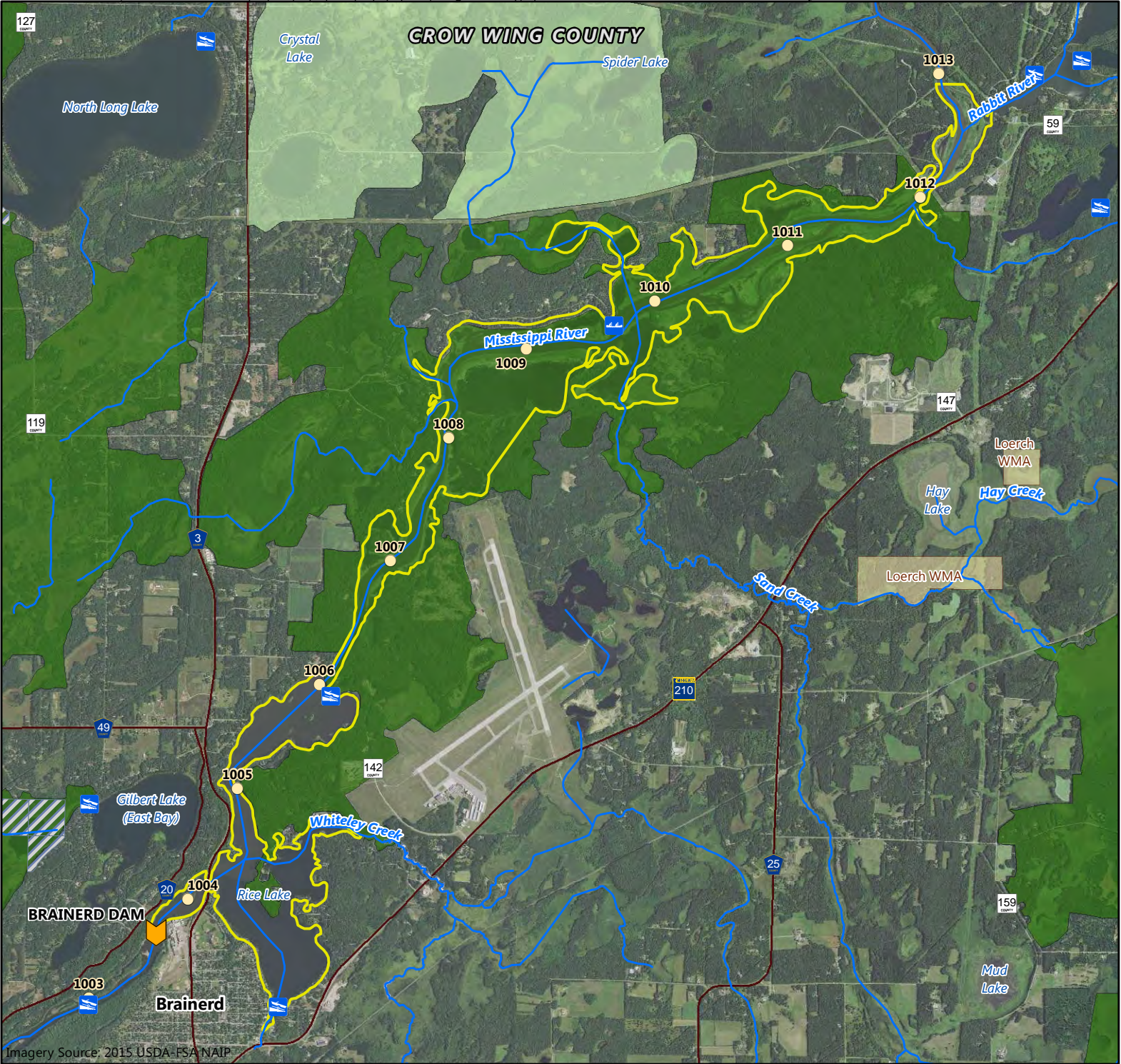


Figure 3

SURFICIAL SOILS
Brainerd Dam
Brainerd Public Utilities
Exhibit E-5



- River Mile Marker
- Dam Location
- Project Boundary
- Major Highway
- State Wildlife Management Area
- DNR Fisheries Lands
- MBS Sites of Biodiversity Significance
 - Outstanding
 - High
 - Moderate
 - Below

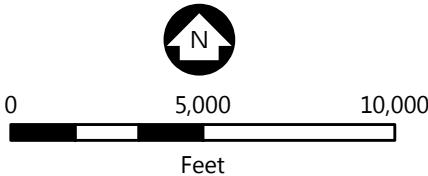
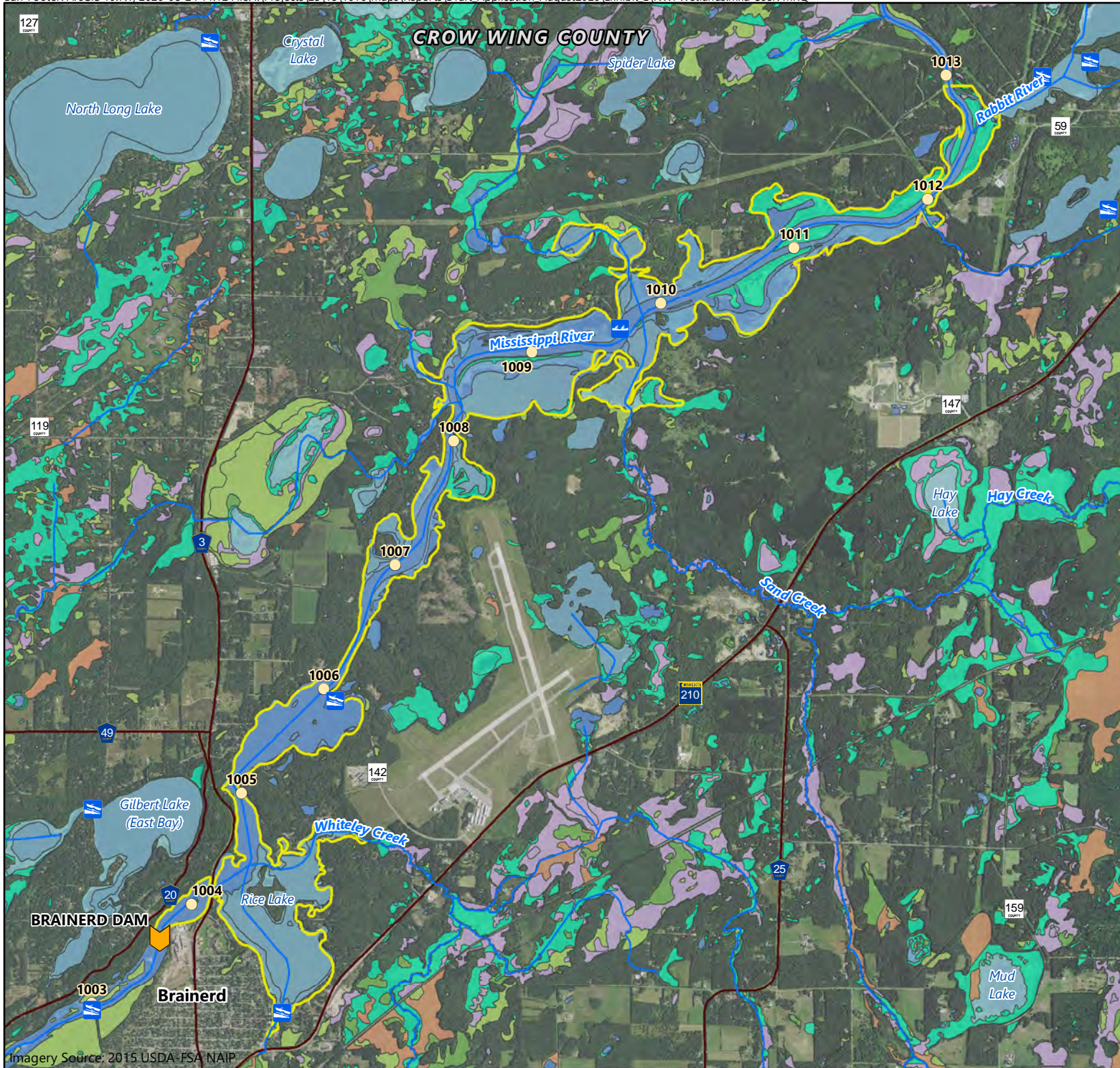


Figure 4

BOTANICAL AND WILDLIFE
 RESOURCES
 Brainerd Dam
 Brainerd Public Utilities
 Exhibit E-5



- River Mile Marker
- 📍 Dam Location
- 📐 Project Boundary
- 🛣 Major Highway
- Wetlands (National Wetlands Inventory)
 - 🌿 Freshwater Emergent Wetland
 - 🌳 Freshwater Forested Wetland
 - 🌿 Freshwater Forested/Emergent Wetland
 - 🌳 Freshwater Forested/Shrub Wetland
 - 💧 Freshwater Pond
 - 🌿 Freshwater Shrub Wetland
 - 🌿 Freshwater Shrub/Emergent Wetland
 - 🌊 Lake
 - 🌊 Riverine

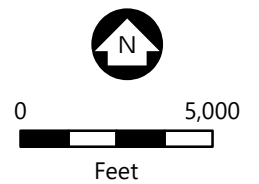
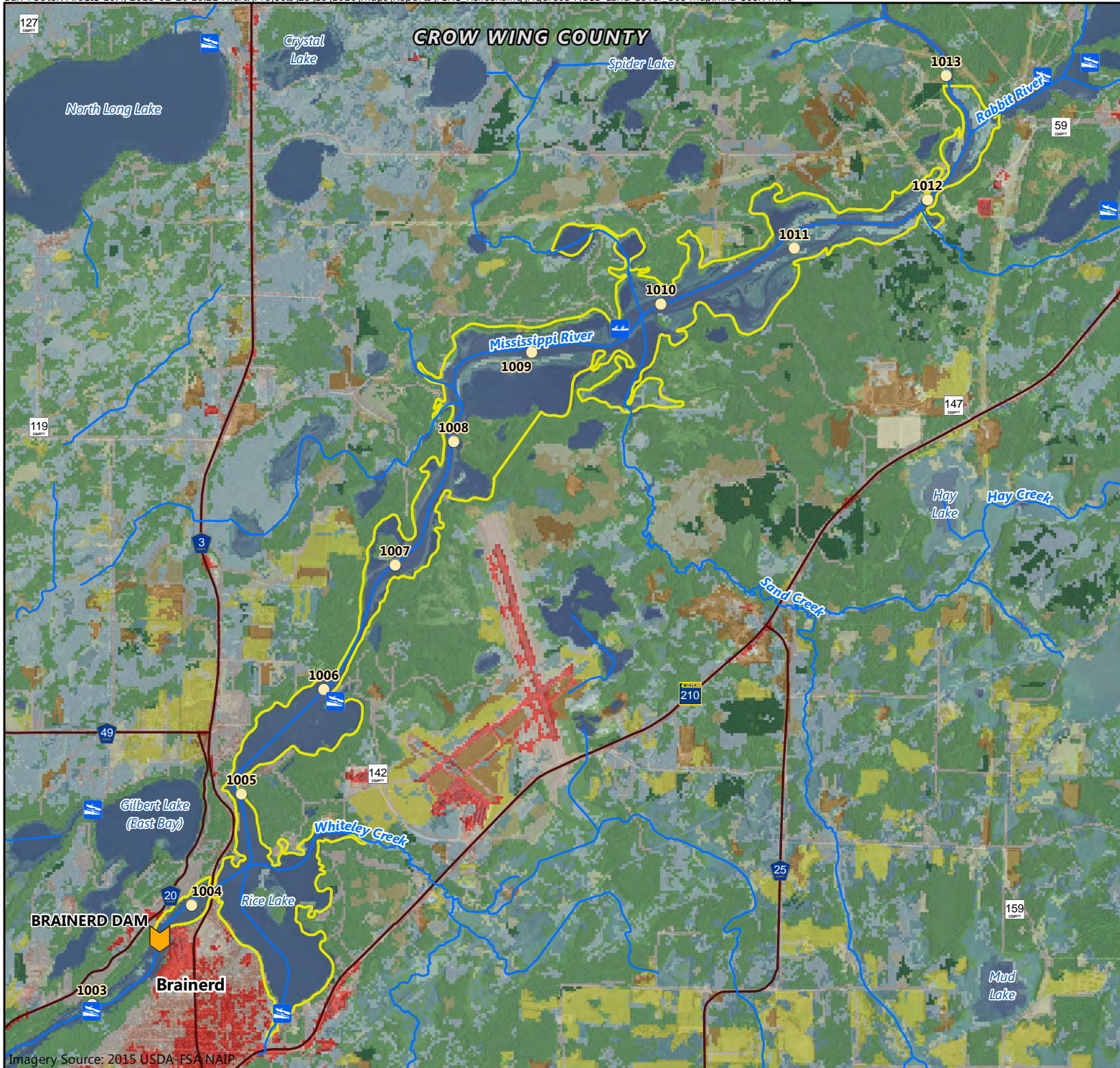


Figure 5

WETLANDS
Brainerd Dam Brainerd
Public Utilities



- River Mile Marker
 - Dam Location
 - Project Boundary
 - Major Highway
- National Land Cover Dataset 2011
- Open Water
 - Developed, Open Space
 - Developed, Low Intensity
 - Developed, Medium Intensity
 - Developed, High Intensity
 - Barren Land
 - Deciduous Forest
 - Evergreen Forest
 - Mixed Forest
 - Shrub/Scrub
 - Grassland/Herbaceous
 - Pasture/Hay
 - Cultivated Crops
 - Woody Wetlands
 - Emergent Herbaceous Wetlands

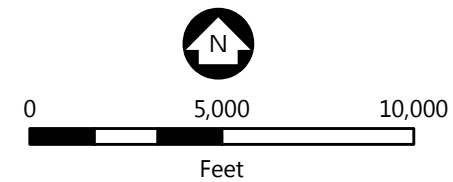
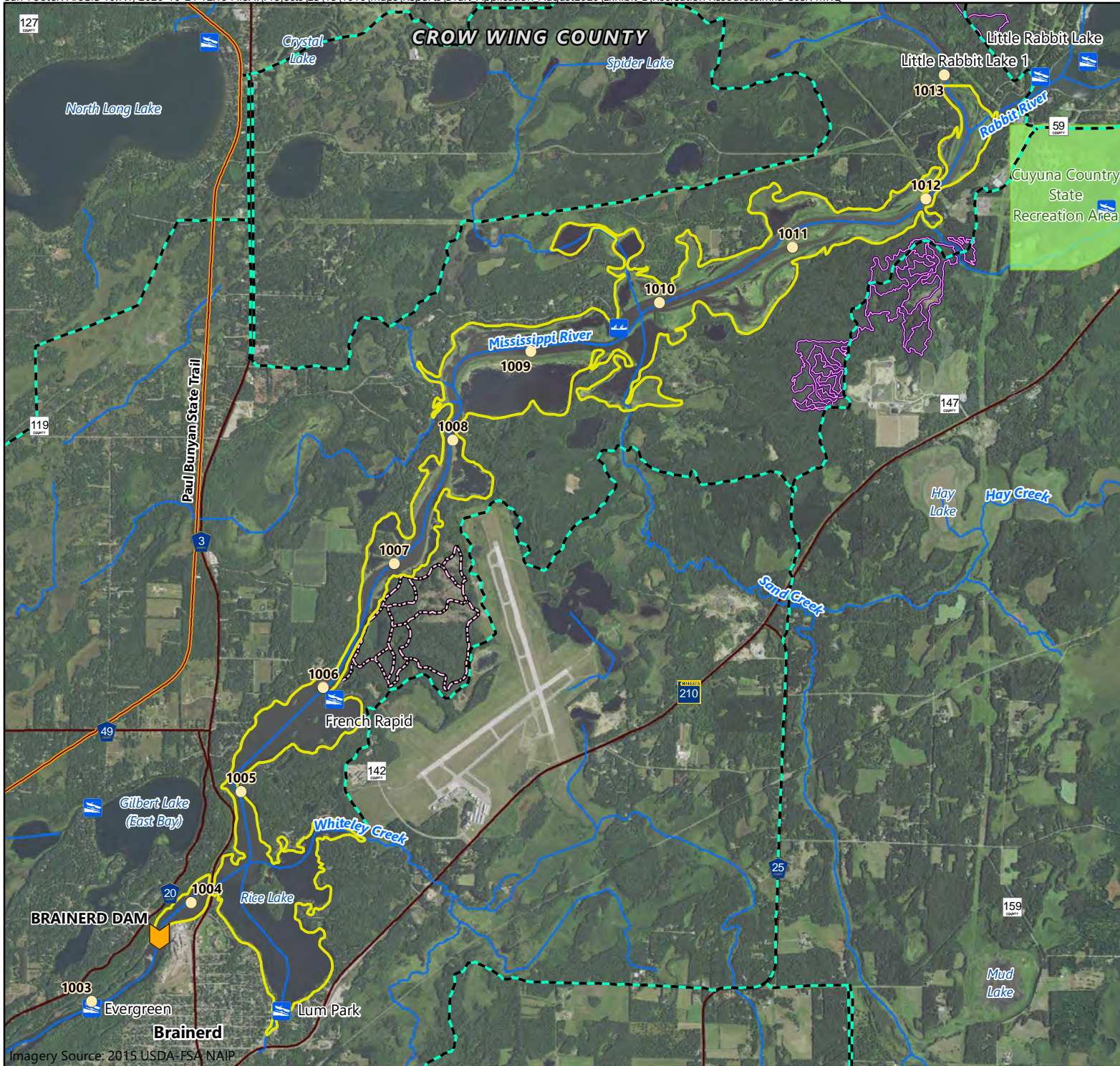


Figure 6

LAND COVER
Brainerd Dam
Brainerd Public Utilities
Exhibit E-5



- River Mile Marker
- ▮ Brainerd Dam
- ▮ Project Boundary
- ▮ Major Highway
- ▮ Carry-in/Portage
- ▮ Trailer Launch
- ▮ French Rapid Ski Trails
- ▮ State Trail
- ▮ Snowmobile Trail
- ▮ Off-Highway Vehicle Use Trail
- ▮ State Park

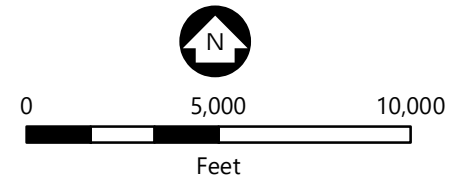


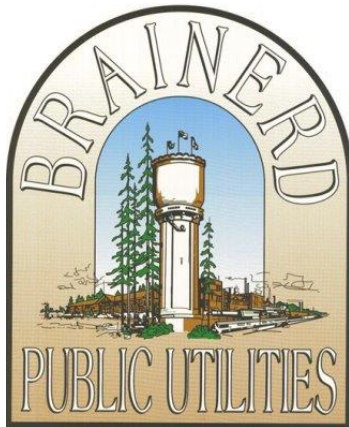
FIGURE 7

RECREATION RESOURCES
Brainerd Hydroelectric Project
Brainerd Public Utilities
Exhibit E-5

Dissolved Oxygen and Temperature Study Report

Brainerd Hydroelectric Project *FERC License No. 2533*

Prepared for:
Brainerd Public Utilities
Brainerd, Minnesota



January 22, 2020

Available for Public Release

Dissolved Oxygen and Temperature Study Report Brainerd Hydroelectric Project

January 22, 2020

Preface

Brainerd Public Utilities (BPU) began the renewal process for the Federal Energy Regulatory Commission (FERC) license of the Brainerd Hydroelectric Project FERC Project No. 2533 (Project). As part of the relicensing process a Dissolved Oxygen and Temperature study (Study) was requested. This report documents the methods and results of the Study that investigated water temperature and dissolved oxygen of the Mississippi River near the Project.

FERC must give equal consideration to all uses of the waterway on which a project is located, and what conditions should be placed on any license that may be issued. In making its license decision, FERC must equally consider the environment, recreation, fish and wildlife, and other non-developmental values of the Project, as well as power and other developmental values.

Water quality at the Project supports an aquatic ecosystem that provides public opportunities, including sport fisheries. FERC considers the effects of Project operation on dissolved oxygen (DO) and temperature relevant to its public interest determination.

The MPCA has a water quality monitoring station approximately 1,700 feet upstream of the Project, and the U.S. Geological Survey (USGS) operates water quality monitoring stations downstream of the Project. However, none of these stations have recorded measurements for DO and temperature.

Dissolved Oxygen and Temperature Study Report Brainerd Hydroelectric Project

January 22, 2020

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Abbreviations and Acronyms

% Sat	Percent Saturation
°C	degrees Celsius
BPU	Brainerd Public Utilities (Licensee)
BPUC	Brainerd Public Utilities Commission
CFR	Code of Federal Regulations
cfs	cubic feet per second
DO	Dissolved Oxygen (expressed as milligrams per liter or percent saturation)
DQA	Data Quality Assessment
FERC	Federal Energy Regulatory Commission
mg/L	milligrams per liter
MPCA	Minnesota Pollution Control Agency
NAD83	North American Datum 1983
NGVD	National Geodetic Vertical Datum 1929
PARCC	Precision, Accuracy, Representativeness, Completeness, and Comparability
Project	Brainerd Hydroelectric Project
QA	quality assurance
RSP	Revised Study Plan
Study	Dissolved Oxygen and Temperature Study
USGS	U.S. Geological Survey

Definitions

Licensee	The license was issued to the city of Brainerd and its Brainerd Public Utilities Commission (BPUC). Brainerd Public Utilities (BPU) manages the Project.
Project	Brainerd Hydroelectric Project, Federal Energy Regulatory Commission (FERC) No. 2533 (Project)
Project Area	The area within the Project boundary consisting of "...lands necessary for the operation and maintenance of the Project and for other Project purposes..." (1)
Project Boundary	The boundary line defined in the Project license issued by the FERC that surrounds the "...lands necessary for the operation and maintenance of the Project and for other Project purposes..." (1)
Relicensing	The process of acquiring a new FERC license for an existing hydropower project under expiration of the existing FERC license

1.0 Introduction

Brainerd Public Utilities (BPU) is in the process of relicensing the Brainerd Hydroelectric Project (Project) with the Federal Energy Regulatory Commission (FERC). As required by the December 10, 2018 Revised Study Plan (RSP) (2) for the Project, this document describes the Dissolved Oxygen and Temperature Study (Study) completed in 2019.

1.1 Known Resource Management Goals

The state of Minnesota has established water quality standards (3) to protect water resources for uses such as fishing, swimming, and other recreation and to sustain aquatic life. These standards are a measure to identify polluted waters or healthy waters in need of protection and guide the limits on what regulated facilities can discharge to surface water. These rules are administered by the MPCA. The MPCA is continually working to revise, develop, and otherwise improve Minnesota's water quality standards.

1.2 Public Interest Considerations

FERC must give equal consideration to all uses of the waterway on which a project is located, and what conditions should be placed on any license that may be issued. In making its license decision, FERC must equally consider the environment, recreation, fish and wildlife, and other non-developmental values of the Project, as well as power and other developmental values.

Water quality at the Project supports an aquatic ecosystem that provides public opportunities, including sport fisheries. FERC considers the effects of Project operation on dissolved oxygen (DO) and temperature relevant to its public interest determination.

1.3 Existing Information

The MPCA has a water quality monitoring station approximately 1,700 feet upstream of the Project, and the U.S. Geological Survey (USGS) operates water quality monitoring stations downstream of the Project. However, none of these stations have recorded measurements for DO and temperature.

2.0 Project Location, Facilities, and Watershed

2.1 Licensee

The Project is owned and operated by the city of Brainerd and its Public Utilities Commission under a license from the FERC as Project No. 2533.

2.2 Project Location

The Project is located in Crow Wing County on the Mississippi River near the northeast side of Brainerd, Minnesota, as shown in Figure 2-1. The Project is located approximately 130 miles north of the Minneapolis – St. Paul metropolitan area.



Figure 2-1 Project Location

2.3 Project Overview

From the left bank of the Mississippi River (looking downstream), the Project consists of a short left embankment, a 256-foot-long powerhouse, a 78-foot-long slide gate section, a 207-foot-long bascule (crest) gate section, a single 20-foot-wide steel tainter gate, and a 200-foot-long right embankment, as shown in Figure 2-2. The Project is located on land owned by BPU and is a run-of-river hydroelectric project with an authorized installed capacity of 3,542.5 kW.

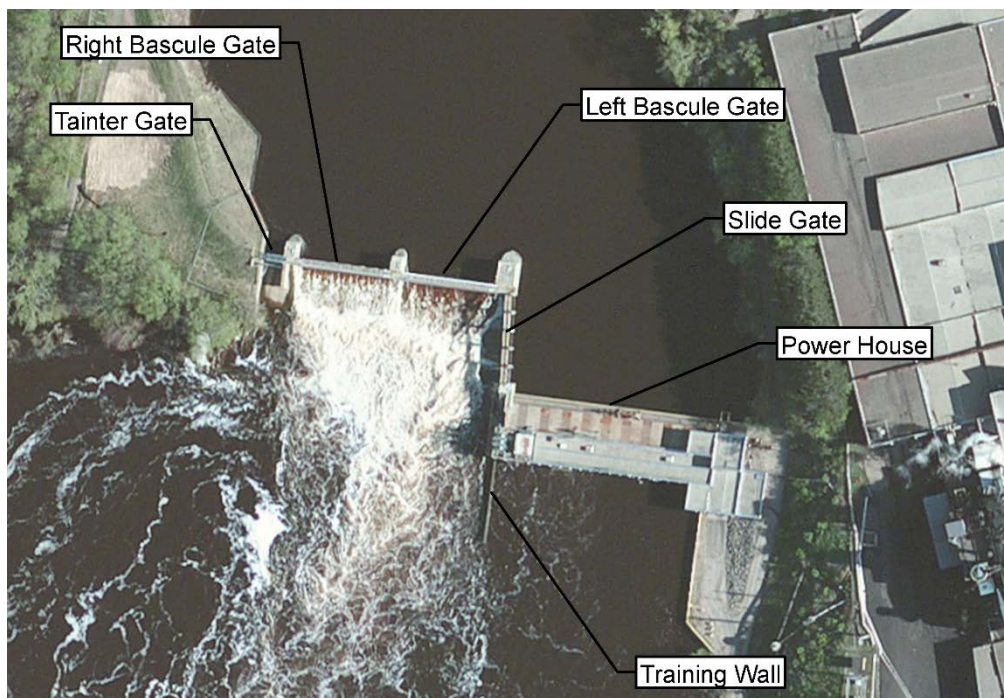


Figure 2-2 Project Overview

2.3.1 Watershed and Regional Water Quality

The Project is located in the Mississippi-Brainerd (#10) major watershed. A brief review of aerial photography indicates that land uses immediately upstream include native hardwood forests, agriculture, and private residential. The reservoir created by the BPU dam extends approximately 8 miles to the northeast of the Project.

In its January 2017 publication on the water quality of the Upper Mississippi River (4), the Minnesota Pollution Control Agency (MPCA) notes that the river upstream and downstream of Brainerd is “Fairly Healthy” and “mostly meets the river life and recreation standards”. The stretch of river immediately upstream of Brainerd (Grand Rapids, Minnesota to Brainerd, Minnesota) failed to meet river life standards because of sediment levels in the water, while the downstream stretch (from Brainerd, Minnesota to St. Cloud, Minnesota) met water quality standards for both river life and recreation.

3.0 Study Plan

This Study was requested to evaluate the DO concentration of water entering the Project's powerhouse intakes within the reservoir, then discharged immediately downstream of the powerhouse into the Mississippi River during summer conditions.

3.1 Objectives

The objectives of the Study are to:

- Identify the DO concentration and temperature of water entering the Project intakes;
- Describe any temporal variations of DO concentration and temperature;
- Identify the DO and temperature profile within the Project reservoir in the vicinity of the intakes; and,
- Describe the changes of DO concentrations and temperature in the river downstream of the Project.

4.0 Methods

This section describes the methods used in the Study, which were outlined in the RSP.

4.1 Monitoring Locations

This Study identified four monitoring locations; one upstream and three downstream locations. The upstream location is located immediately upstream of the Project intake, at the intersection of the slide gates and the powerhouse. In accordance with the RSP, this monitoring location had to be placed with 33 feet of the intakes. The downstream locations are located 150 feet (Site 1), 300 feet (Site 2), and 450 feet (Site 3) downstream of the Project. Figure 4-1 shows the monitoring locations in relation to the Project.

Water depths vary between each of the monitoring locations. In the reservoir (upstream location), water depth was approximately 6 feet, and generally slow-moving (pool). Water depths at Site 1, Site 2, and Site 3 were approximately 15 feet, 30 feet, and 12 feet, respectively, due to irregularities in the riverbed downstream of the Project. At the downstream monitoring locations, water was deeper and flowing quickly (runs).

4.2 Study Variables

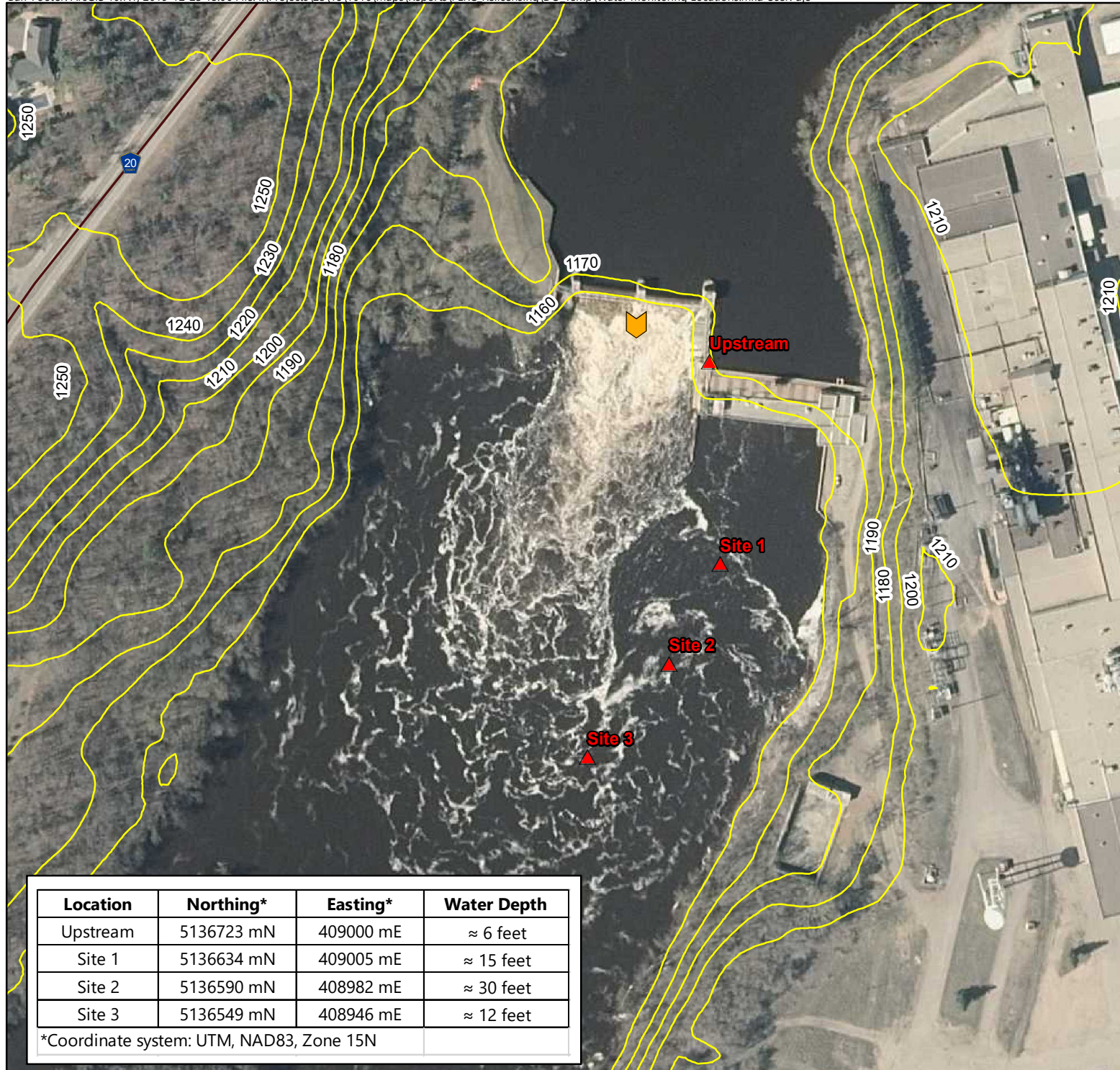
The RSP identified DO and water temperature as the water quality monitoring variables of interest. These variables are effective indicators for overall health of the aquatic system, as fish and other organisms require DO and temperature within certain ranges.

During data collection, information on water condition (odor, color, contents, etc.), hydrology, and Project operations (spillway and generator flow) was also collected. Although this Study was not designed to model the variables associated with DO and temperature, the inclusion of these supplemental variables may provide context to DO and water temperature results. Information on each of the variables is described Sections 4.2.1, 4.2.2, and 4.2.3 .

4.2.1 Dissolved Oxygen

All natural surface waters contain some amount of DO, which is used by living aquatic organisms for respiration. This amount of DO can be quantified as either a concentration (typically in units of milligrams per liter (mg/L) for surface waters), or as a percent saturation (100-percent saturation indicates the water contains a maximum amount of DO at equilibrium). Concentration of DO in surface waters varies with temperature, pressure, turbulence, depth, the concentration of other solutes in the water, and biochemical factors, such as organismal respiration and decomposition of organic matter. In general, DO concentrations are highest when waters are cold, turbulent, and clear; DO concentrations are lowest when waters are warm, stagnant, and contain decomposing organic matter.

DO concentrations of 6 to 10 mg/L are not uncommon for natural surface waters in the summer months. At 5°C, equilibrium DO value is 12.75 mg/L, and at 30°C the equilibrium value is 7.54 mg/L (5). Concentration of DO in water can be raised by photosynthesis of algae or submerged aquatic vegetation,



- ▲ Monitoring Locations (6/7/2019)
- Elevation (feet AMSL)
- Dam Location
- Major Highway

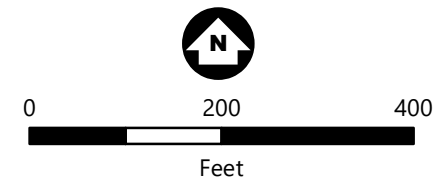


FIGURE 4-1

WATER QUALITY
MONITORING LOCATIONS
Brainerd Dam
Exhibit E-6
Brainerd Public Utilities

or lowered by excessive biochemical oxygen demands. Diurnal DO fluctuations are often a function of photosynthesis during daylight hours producing oxygen, and respiration from organisms consuming oxygen. DO concentrations also fluctuate seasonally.

4.2.2 Temperature

Water temperature influences the oxygen saturation level and is related to DO as discussed above. Water temperature is generally a function of air temperature and the temperatures of source waters (groundwater, precipitation, and surface runoff). Seasonally, highest water temperatures tend to co-occur with highest air temperatures.

4.2.3 Condition and Contents

In addition to the target variables of DO and temperature, field staff also recorded qualitative observations on the condition and contents of water, such as surficial foam, algal blooms, fish kills, odors, color, organic sheen, etc. This information was collected to provide context to the dataset, and to potentially explain any low DO concentrations.

4.3 Monitoring Schedule

In accordance with the RSP, data collection monitoring was completed on a weekly basis, between June 1 and September 30. Within the weekly requirement, monitoring events were scheduled according to weather conditions and personnel availability. This Study did not use data-logging instruments, so continuous data on DO and temperature are not available.

4.4 Monitoring Personnel

The data collection was completed by BPU employees that work at the Project, with guidance and oversight from Barr Engineering Co.. The decision to have BPU employees conduct the monitoring was based on the BPU employees' familiarity with the operations of the Project, BPU employee availability, and associated cost savings.

4.5 Monitoring Procedures

For more consistent results, field staff conducted weekly monitoring events in accordance with the following procedural specifications:

1. Conduct a calibration check on the data collection instrument, and re-calibrate the instrument if the calibration value exceeds manufacturer recommendations.
2. Record water levels at the Project (upstream and downstream), flow at the USGS station, spillway flowage, and generator speeds.
3. Document overall site conditions (including current and recent weather)
4. Using the skiff, navigate to the monitoring location that is farthest downstream (Site 3), and conduct monitoring as follows:

- a. Anchor boat at the monitoring location.
 - b. Lower instrument probe into the water, using an anchored guide line or a weighted probe to counteract drift effects from fast-moving water and ensure that the probe is lowered vertically into the water.
 - c. Commence monitoring at a depth of 3 feet below the water surface.
 - d. Field staff will allow instrument readings to stabilize before recording values.
 - e. Field staff will record dissolved oxygen concentration (mg/L), dissolved oxygen saturation (% Sat), and water temperature (°C).
 - f. Continue monitoring at 3-foot intervals until riverbed is encountered.
 - g. Collect photographs and make qualitative observations on water condition and contents.
5. Move upstream to next monitoring location (Site 2), and repeat monitoring procedures as noted in Step 4 above.
 6. Move upstream to next monitoring location (Site 1), and repeat monitoring procedures as noted in Step 4 above.
 7. Motor back downriver to the public boat landing, trailer the boat, and return to the Project.
 8. Access the upstream monitoring location from the walkways atop the Powerhouse, and repeat monitoring procedures as noted in Step 4 above.
 9. Transmit field data and recordkeeping.

During each monitoring event, field staff collected photographs at each of the monitoring locations. These photographs document useful information that can be used for understanding the results, such as location, weather conditions, water levels, water condition, and spillway usage. These photographs also verify that monitoring was conducted at the noted days and times.

4.6 Equipment

The following essential equipment was used to collect the necessary data to support Study objectives; other non-essential parts, supplies, or maintenance tools are not included in this list:

- Measurements for DO and temperature were taken with a specific instrument: a YSI Optical DO Model EcoSense® ODO200. An optical DO instrument was selected for use because it does not require a “warm-up” time, requires less frequent maintenance, and it is possible for the calibration to hold for several months. BPU purchased this instrument in new condition immediately prior to the start of the Study. Equipment calibration and maintenance work are noted in Section 4.8.

- Field staff used the cameras from mobile phones to collect photographs while completing the monitoring.
- Access to the downstream monitoring locations was gained using a small metal skiff with a gasoline outboard motor. This skiff is owned by the BPU, and kept for the purpose of navigating waters near the Project.

4.7 Hydrology Monitoring

In addition to collecting in-situ DO and temperature measurements, BPU collected the following information to aid in the analysis of the data and provide context to the collected results:

- Reservoir Water Elevation
- Downstream Water Elevation
- Flow @ USGS gage #05242300
- Generator Speed (percent, for Generators 1 through 5)

4.7.1 Precipitation Data

Daily precipitation data were obtained from the Minnesota State Climatology Office, using the web-based "Nearest Station Precipitation Data Retrieval" tool. The tool searches and pulls the data closest to the selected target location for the timeframe chosen. The following parameters were used to obtain precipitation data:

- Target Location: Crow-wing-Oak lawn-Brainerd 45N 30W S18 (latitude: 46.33750 longitude: 94.18361)
- Year: 2018-2019
- Number of missing days allowed per month: 3
- Retrieve daily data

The closest location found was 2 miles away at the Brainerd National Weather Service Station, located in Section 36 of Township 45 North, Range 31 West.

4.7.2 Water Elevation Data

As part of its normal operation, BPU operates and maintains instrumentation to record water levels upstream and downstream of the Project. Immediately prior to each monitoring event, personnel recorded water levels in both the upstream reservoir and the downstream river.

4.7.3 Flow Data

BPU measures the flow of the Mississippi River at USGS stream gage #05242300 (located at the Project) as part of its normal operation. BPU also tracks the flow of water over the spillways. Both flow values are

recorded in cubic feet per second (cfs). Immediately prior to each monitoring event, personnel recorded flow values from both meters.

4.7.4 Generator Speed

BPU operates and maintains instrumentation to track the speed of each of the five generators at the Project as part of its normal operation. Generator usage can be throttled, so usage is recorded as a percentage, with full operation of a generator recorded as “100 percent”. Immediately prior to each monitoring event, personnel recorded the speed of each of the five generators at the Project.

4.8 Quality Assurance

Quality assurance (QA) measurements were designed and implemented to verify the field data collected during this Study are suitable for their intended purpose. QA measures include the training of field staff, the development of data collection forms, calibration and maintenance of monitoring equipment, and data review. These QA measures are described in detail in Sections 4.8.1 - 4.8.5.

4.8.1 Training

As noted in Section 4.4, the monitoring data was collected by BPU with guidance from Barr. For consistency throughout the season, a training session was held at the Project on May 28, 2019, prior to the start of the Study. The training session included discussion and demonstrations on the following topics:

- Study plan objectives
- Water chemistry
- Equipment operation and calibration
- Monitoring procedures
- Data collection requirements

Immediately following the discussion and equipment demonstrations, BPU conducted a monitoring event under Barr supervision, to gain experience with the instrument and monitoring procedures. In addition, Barr maintained regular communication with the BPU staff to answer questions and to verify the work was being completed as planned.

4.8.2 Data Collection Forms

For the collection of complete and consistent data, Study-specific field data forms were developed and used when collecting data. These forms were designed to guide field staff in the calibration and operation of the instrument, and in the collection of field data. The blank data forms are included in Appendix A.

4.8.3 Equipment Calibration

Although the monitoring was done with an instrument resistant to calibration drift, the monitoring staff performed a calibration check of the DO sensor immediately prior to each monitoring event. In accordance with procedures specified by the manufacturer, the instrument was re-calibrated if the absolute percent difference of the instrument reading and the expected reading was greater than 2 percent. Calibration of the temperature sensor is not possible on the instrument, so calibration checks of temperature were not performed. BPU staff completed a written record of each calibration check, and of each recalibration.

4.8.4 Equipment Maintenance

BPU purchased a new instrument immediately prior to the commencement of the Study. Because a new instrument was used, and no equipment malfunctions were observed during the Study, no equipment maintenance was needed. The manufacturer recommends that the DO sensor should be replaced prior to the start of each season for best results.

4.8.5 Data review

Upon completion of a monitoring event, BPU staff transmitted monitoring data to Barr, to review for completeness and reasonableness. This QA measure was implemented so that if incomplete or confounding data were recorded, additional monitoring could be completed during the same week and compliance with the data collection schedule could be maintained. In addition to the review of weekly data packet, a post-study data quality assessment (DQA) was performed to determine the usability of the dataset. A summary of the DQA is included in Section 6.1.

5.0 Results

This section presents graphical representations and brief summaries of the data collected during the Study. Data are included for DO, temperature, precipitation, water elevations, generator usage, and spillway usage. Appendix B contains a tables of measurements, Appendix C contain charts of DO and temperature, and Appendix D contains representative photographs taken during the monitoring events.

5.1 Results

This section presents graphical representations and brief summaries of the data collected during the Study. Figure 5-1, Figure 5-2, and Figure 5-3 show average values over time for each variable and monitoring location. Appendix B contains raw data and charts.

5.1.1 Dissolved Oxygen

DO measurements were collected at each of the four monitoring locations as both concentrations (mg/L) and saturations (% Sat). Figure 5-1 shows the average DO concentrations at each monitoring location over the course of the Study. Figure 5-2 shows the average DO saturation at each monitoring location over the course of the Study. For both figures, average values were obtained by calculating the mean value for the profile data collected at each monitoring location.

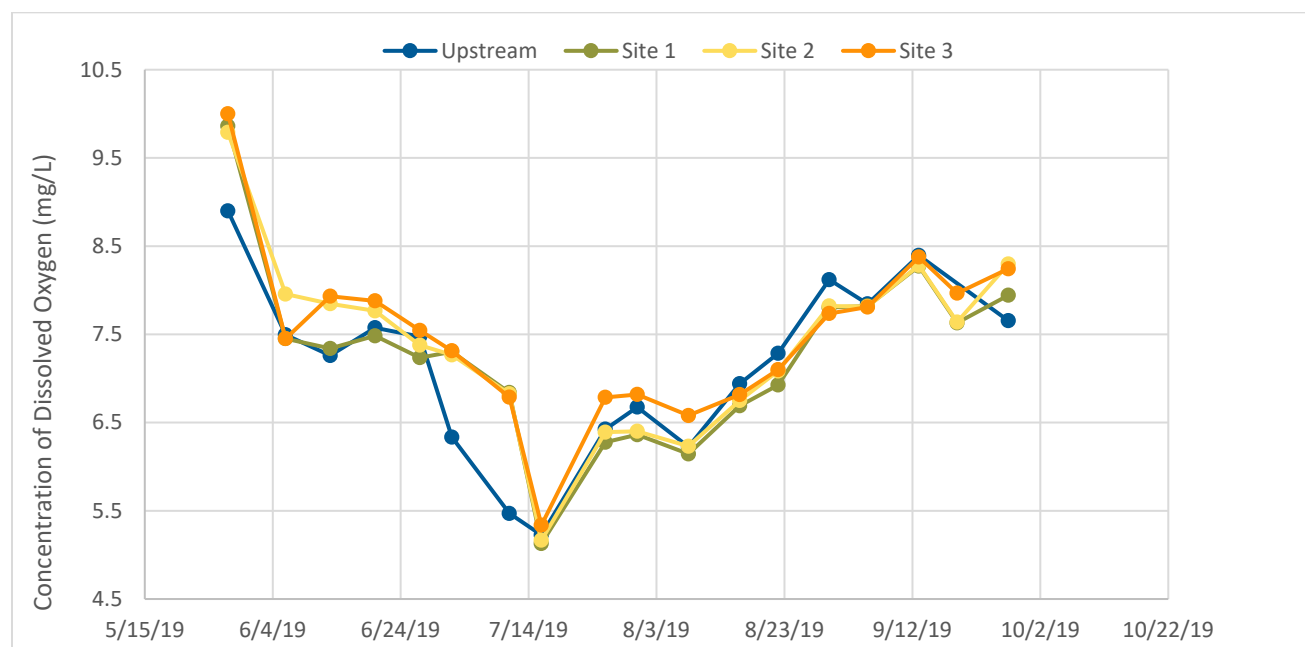


Figure 5-1 Average DO Concentrations

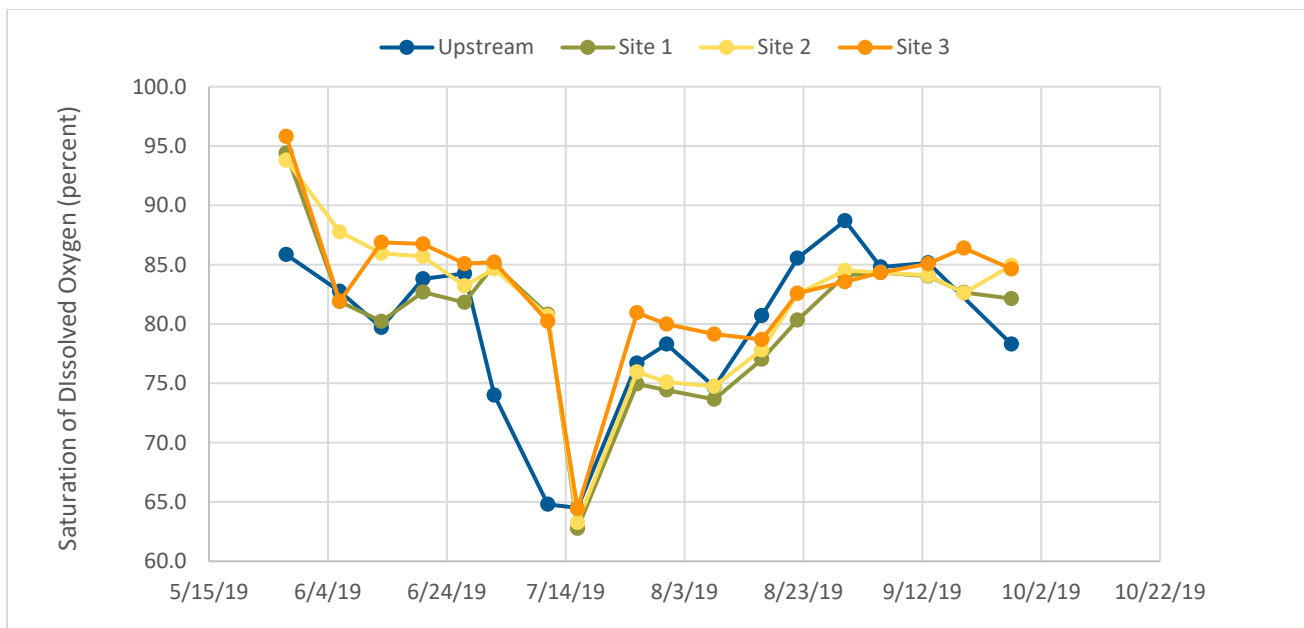


Figure 5-2 Average DO Saturation

5.1.2 Temperature

Figure 5-3 shows the average water temperature at each monitoring location over the course of the Study. Average values were obtained by calculating the mean value for the profile at each monitoring location.

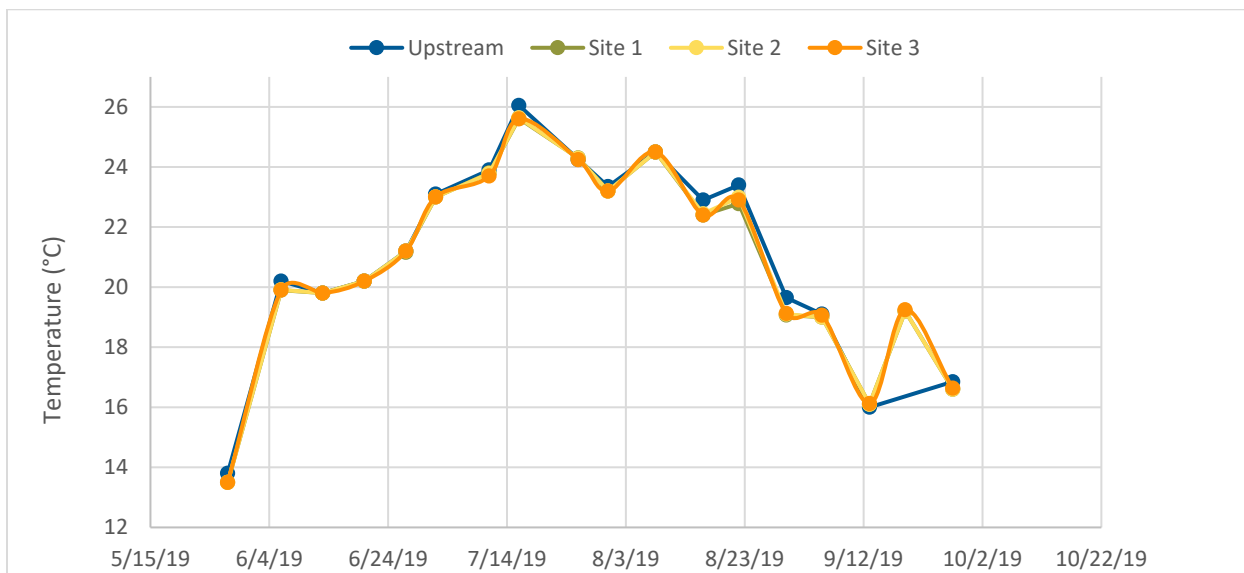


Figure 5-3 Average Temp

5.2 Hydrology

This section provides a brief description of hydrology at the site, including precipitation at the nearest weather station, water levels (both upstream and downstream of the dam), generator usage, and spillway usage.

5.2.1 Precipitation

Figure 5-4 depicts the daily precipitation totals. Data were downloaded from Brainerd station (which is closest to the Project), but it is recognized that the Project is many miles of the Mississippi River headwaters, so the Brainerd station does not represent all the precipitation that occurs within the catchment upriver of the Project.

The following observations were made about precipitation:

- During the Study there were four events that yielded greater than 1 inch of precipitation.
- The largest event during the Study occurred on July 15th and yielded 2.26 inches of precipitation.

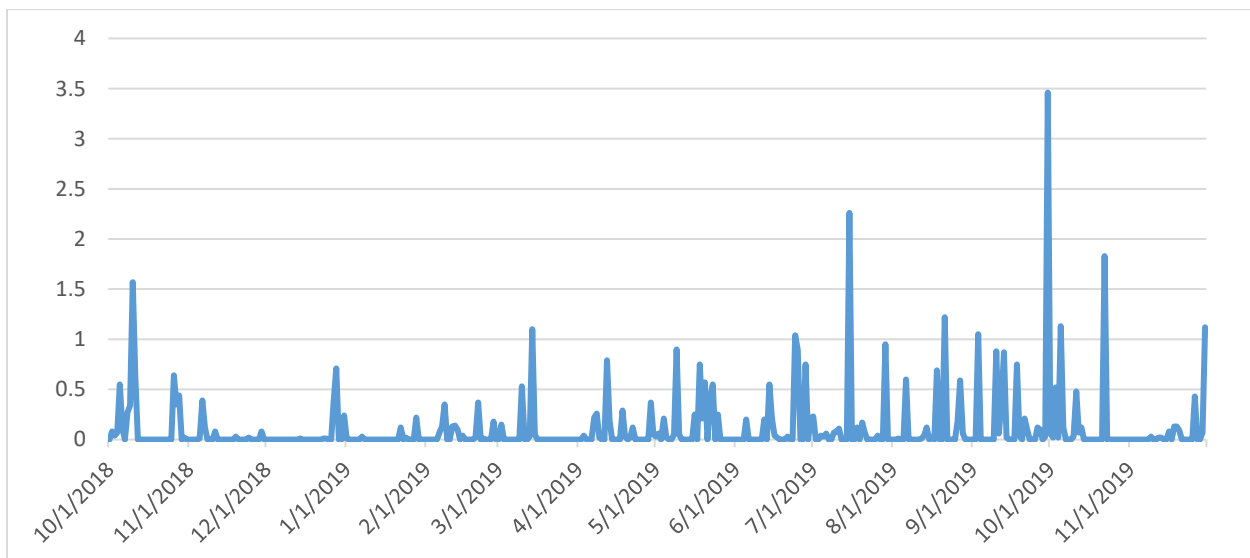


Figure 5-4 Precipitation data at NWS-Brainerd

5.2.2 Flow and Water Levels

Figure 5-5 shows a comparison of weekly flow and water level measurements at the Project. Flows were recorded in cfs, and water levels were recorded in feet. Figure 5-5 indicates flow at the spillway and USGS Gage upstream, follow the same pattern as the downstream water over the course of the Study. The highest flows at the spillway and USGS Gage occurred at the beginning of the Study (6,750 cfs and 8,730 cfs respectively) and the lowest flows occurred in August 2019 (521 cfs and 2,720 cfs respectively).

According to weekly measurements, water levels in the reservoir remained consistent during the Study, varying less than half a foot. Downstream water levels were highest early in the season (approximately 1,166 feet) and then stayed fairly constant for the remainder of the Study, varying less than three feet.

Flow and water level data indicate a large surge of water passed through the Project for about two weeks in early July.

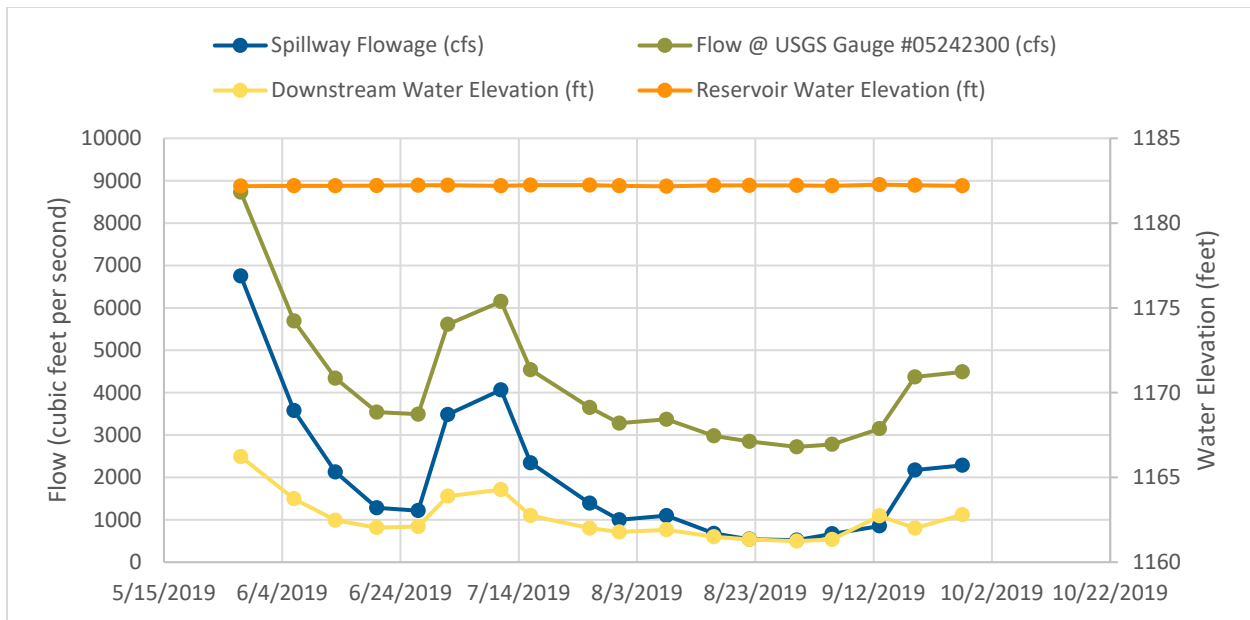


Figure 5-5 Water Level Comparisons

5.2.3 Generator Speed

Weekly data suggest that the Project generators were operating at, or near full, capacity for the duration of the Study. Generator 1 and Generator 2 were operating at 100% speed during each monitoring event. Generator 3 was operating at 100% speed for sixteen of the eighteen monitoring events. Generator 4 and 5 were operating at 100% speed for seventeen of the eighteen monitoring events.

6.0 Discussion

6.1 Data Quality Assessment

This Study includes a DQA, which considers the data collected in terms of precision, accuracy, representativeness, completeness, and comparability (PARCC), and can be useful for determining limitations and usability of the dataset, and establishing credibility of the Study. This DQA assumes that all collected data are valid and useful, unless evidence demonstrates otherwise.

In this Study, data were generated by in-situ measurements, instead of by sample collection and laboratory analysis. Therefore, typical data validation techniques used in the review of laboratory-generated data (i.e., comparisons of duplicates, matrix spikes, blanks, etc.) are not possible. Instead, this DQA relies on qualitative information to make inferences about the suitability of the data.

This DQA only considers the data; it does not include an assessment of the hydrologic data included in the Study (e.g., water levels, generator usage, spillway usage, or precipitation). These data are presented as-is, with no assessment on data quality or suitability for use.

6.1.1 Precision

Precision is a measure of repeatability and the consistency of measurements. In this DQA, data precision is evaluated through a review of instrument specifications (from the manufacturer). Table 6-1 shows the specifications for the instrument used in the Study (6) and includes the range of conditions in which the instrument was intended to be used, the resolution with which the instrument can quantify change, and the expected accuracy of the instrument.

Table 6-1 Specifications for YSI ODO200 DO/Temperature Instrument

Parameter	Range	Resolution	Accuracy
Temperature	0 to 50 °C*	0.1 °C	± 0.3 °C
Dissolved Oxygen	0.0 to 200 % air saturation	0.1 % air saturation	± 1.5 % of reading or ± 1.5 % air saturation, whichever is greater
	0.00 to 20.0 mg/L	0.01 mg/L	± 1.5 % of reading or ± 1.5 mg/L, whichever is greater

* Automatic dissolved oxygen temperature compensation range is 0 to 45 °C.

A review of Minnesota Water Quality Standards (3) indicates that DO values are generally reported to the tenth of a milligram per liter, so an instrument that can detect change to one hundredth of a milligram per liter is deemed precise for this Study.

The monitored waters were within the intended usability range of the instrument, so the resolution values shown in Table 6-1 are applicable.

These findings suggest that the data are sufficiently precise for the intended use as baseline data.

6.1.2 Accuracy

Accuracy is a measure of how close a measured value is to the true value. However, in this DQA, data accuracy is subjectively inferred through a review of instrument specifications (from the manufacturer), and a review of instrument calibration and maintenance records. The RSP did not provide any specifications for the necessary accuracy of the data. A review of data accuracy is presented below:

- **Instrument Specifications:** Table 6-1 shows the expected accuracy of the instrument used in this Study.
- **Calibration/Maintenance Records:** Field data indicate that calibration checks on the DO sensor were performed prior to each monitoring event. Field staff re-calibrated the instrument whenever a calibration check determined that the calibration was outside of the target range. During the eighteen-week Study, the meter was re-calibrated four times. Calibration records are not included in this report, but are available upon request.

As noted in the instrument operation manual, calibration of the temperature sensor is neither available nor required, but a verification of the temperature sensor could be accomplished by touching the instrument's temperature sensor to a National Institute of Standards and Technology -traceable thermistor and observing the measurements. An accuracy check on the temperature sensor was not completed in 2019, but the instrument was new from the manufacturer immediately prior to the commencement of this Study, so the reasonably reliable temperature data were expected.

These findings suggest that the data are sufficiently precise for the intended use as baseline data.

6.1.3 Representativeness

Representativeness is a determination of whether the measurements made during the Study represent actual conditions of the water, and the water body as whole. In this DQA, data representativeness is evaluated through a review of monitoring location placement, monitoring frequency, and measurement frequency. A review of data representativeness is below:

- **Placement of Monitoring Locations:** Monitoring locations were positioned within the river, in accordance with the RSP. Although the upstream monitoring location adequately represents the water flowing into the intakes, it is likely that the upstream monitoring location does not fully represent the DO and temperature conditions throughout the entire reservoir, because water depth at the upstream monitoring location is typically only about 6-feet deep.
- **Monitoring Frequency:** In accordance with the RSP, monitoring data was conducted weekly. This monitoring frequency is sufficient to detect weekly variations, but is not sufficient to detect daily variations in DO and temperature.
- **Measurement Frequency:** In accordance with the RSP, measurements were collected as profiles: measurements were taken 3 feet below the water surface, and continuing at 3-foot intervals until

the riverbed was encountered. The measurement frequency in each profile is sufficient to detect change in variables with depth. Data were collected for the entire water column at each monitoring location. A review of the data suggests that there is minimal variation in chemistry within the water column, possibly due to the mixing introduced by the generators and spillways of the Project.

These findings suggest that the data are sufficiently representative for the intended use as baseline data.

6.1.4 Completeness

Completeness is a determination of whether all necessary monitoring was completed, and completed according to schedule. In this DQA, data completeness is evaluated through a review of monitoring dates and monitoring data. A review of data representativeness is below:

- **Monitoring Events:** A review of the monitoring dates indicates that 18 monitoring events were completed weekly, between June 1 and September 30, in accordance with the RSP.
- **Monitoring Frequency:** A review of the monitoring data indicates that all necessary measurements were completed, with the following exceptions:
 - Upstream monitoring on September 19, 2019. Post-monitoring consultation with the field staff indicates that this data omission was accidental. This weekly dataset was submitted to Barr for review on October 4, 2019, so there was no time to conduct additional measurements for that sampling week.

These findings suggest that the data are sufficiently complete for the intended use as baseline data.

6.1.5 Comparability

Comparability is a determination of whether the collected data are comparable between weekly monitoring events, and whether they are comparable to prior monitoring studies. The 2019 Study constitutes the first year of baseline monitoring at this Project, so the DQA does not include a year-to-year comparison. In this DQA, data comparability is evaluated through a review of the consistency of monitoring procedures. A review of data comparability is below:

- **Monitoring Consistencies:** A review of the monitoring data indicates that the following aspects were completed consistently:
 - Monitoring was completed weekly (during business hours, as dictated by personnel availability and favorable weather conditions);
 - Calibration checks were completed weekly, and instrument calibrations were done as necessary;
 - Monitoring was completed using same instrument and procedures;
 - Monitoring was completed downstream to upstream; and,

- Field data were generally recorded consistently.

These findings suggest that the data are sufficiently comparable (on a week-to-week basis) for the intended use as baseline data.

6.1.6 Data Quality Assessment Summary

The DQA, which included a review of each PARCC parameter, did not identify any reasons to disqualify the data.

6.2 Study Objectives

Section 3.1.1 of the RSP (2) established four study objectives, which are listed and discussed in Sections 6.2.1-6.2.4.

6.2.1 Study Objective #1: Identify the DO concentration and temperature of water entering the Project intakes

The monitoring data indicate the following about the water entering the Project intakes:

- DO concentration at the upstream monitoring location ranged from 5.22 to 8.90 mg/L, with a seasonal mean of 7.16 mg/L.
- DO saturation at the upstream monitoring location ranged from 64.3- to 88.9-percent saturation, with a seasonal mean of 79.6-percent saturation.
- Water temperature at the upstream monitoring location ranged from 13.8 to 26.1°C, with a seasonal mean of 21.0°C.

6.2.2 Study Objective #2: Describe any temporal variations of DO concentration and temperature

The monitoring data indicate the following about temporal variation in DO concentration and water temperature.

- In this Study, DO concentrations recorded during the Study tended to be greatest in late May. DO concentrations generally decreased until mid-July, when DO values were lowest, then increased to early-season levels. DO saturation values also followed a very similar seasonal pattern, and vary inversely with water temperature
- In this Study, water temperatures were lowest early in the growing season, peaked around mid-July, and then generally decreased for the rest of the season.
- These patterns of seasonal variability and the inverse relationship between DO and temperature were not unexpected. Microvariations from week to week were also not unexpected, because the monitoring was conducted on a weekly basis, instead of daily or hourly.

This Study has met Objective #2, within the following context:

- The monitoring was completed on a weekly basis; therefore, this Study can only identify DO and temperature variations that occur on a corresponding weekly basis. Because more frequent monitoring was not conducted, this Study cannot show variations that occur on an hourly or daily basis.
- The monitoring was completed over an 18-week period between June 1 and September 30. Therefore, the Study cannot describe variations that occur outside of this time frame.

6.2.3 Study Objective #3: Identify the DO and temperature profile within the Project reservoir in the vicinity of the intakes

Profile data from the upstream monitoring location suggest that DO and temperature in the reservoir do not vary dramatically with depth. Appendix C contains charts of the profiles, which show very little variation for the duration of the season. The differences between the upper and lower measurements within the profile are less than 0.2 mg/L for DO concentration, less than 2 %Sat for DO Saturation, and less than 0.5 °C for water temperature. These data suggest that the water in the reservoir is well-mixed immediately prior to entering the Project intakes for the duration of the summer season.

This Study has met Objective #3, within the following context:

- The water at the upstream monitoring location was comparatively shallow (approximately 6 feet deep), as compared the downstream location, and was unlikely to exhibit significant variation in DO or temperature with depth. Although it is expected that the reservoir contains deeper pools within 33 feet of the intakes, accessing these areas would have been unsafe with the equipment available to monitoring staff. Also, safely-accessible deep pools in the reservoir would be of sufficient distance from the intakes, as to be not representative of the water entering the intakes. Therefore, the selection process of the upstream monitoring location prioritized safe access and close proximity to intakes over greater water depth.

6.2.4 Study Objective #4: Describe the changes of DO concentrations and temperature in the river downstream of the Project.

A comparison of surficial data between the downstream monitoring locations (Site 1, Site 2, and Site 3), suggest the following:

- DO concentrations in the water downstream of the Project generally increase with distance downriver, but only slightly. In general, the increase in DO concentration from Site 1 to Site 3 is less than 0.5 mg/L. This trend persisted with depth in the profile, and was also present for the duration of the Study.
- DO saturation in the water downstream of the Project does not appear to vary consistently with distance downriver. In general, the variability of DO saturation from Site 1 to Site 3 is less than 10 % Sat. This trend persisted with depth in the profile, and was also present for the duration of the Study.

-
- Temperature in the water downstream of the Project does not appear to vary consistently with distance downriver. In general, the variability of DO saturation from Site 1 to Site 3 is less than 1°C. This trend persisted with depth in the profile, and was also present for the duration of the Study.

This Study has met Objective #4, within the following context:

- The RSP specified that monitoring occur no more than 450 feet downstream of the Project. Therefore, conditions for locations greater than 450 feet downstream of the site are not described by this Study.

7.0 Summary

As detailed in Section 5.0, the Study satisfied the objectives outlined in the RSP, which were to:

- Identify the DO concentration and temperature of water entering the Project intakes;
- Describe any temporal variations of DO concentration and temperature;
- Identify the DO and temperature profile within the Project reservoir in the vicinity of the intakes; and,
- Describe the changes of DO concentrations and temperature in the river downstream of the Project.

This Study was not designed to explain the causes of variation of DO and temperature in the vicinity of the Project. This study does not attempt to determine if current discharges from the Project meet existing water quality standards (3) because continuous measures would be required.

In support of the Study objectives noted above, the data collected by the Study can be summarized as follows:

- DO concentration at the upstream monitoring location ranged from 5.22 to 8.90 mg/L, with a seasonal mean of 7.16 mg/L. Water temperature at the upstream monitoring location ranged from 13.8 to 26.1°C, with a seasonal mean of 21.0°C.
- DO concentrations do not vary dramatically between upstream and downstream locations.
- DO concentrations are highest in early summer and fall, and lowest mid-summer.
- DO concentration and water temperature do not vary dramatically with water depth, either upstream or downstream.

A DQA has determined that the 2019 data are sufficiently complete and usable for the intended purpose of this Study. Additionally, weekly records suggest that the Project was operating at, or near, full capacity for the duration of the Study.

8.0 References

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Appendix A

Field Data Forms

Weekly Sampling Procedure

1. Complete a calibration check on the ODO200 instrument by referencing and completing the **Calibration Check Procedure** form (once per event).
2. Recalibrate DO sensor if necessary, using the **Calibration Procedure** form (once per event).
3. Complete **Sampling Event Data Form** (once per event).
4. Sample at Site 3 (most downstream location) and record data on **Sampling Data Form**.
5. Sample at Site 2 (middle downstream location) and record data on **Sampling Data Form**.
6. Sample at Site 1 (least downstream location) and record data on **Sampling Data Form**.
7. Go to Upstream location (East Pier) and record data on **Sampling Data Form**.
8. At time of sampling, collect photographs of: spillway, upstream towards reservoir, downstream towards river, and riverbanks
9. Do a final review of all data pages, and complete all field notes.
Each sampling event should generate the following field data:
 - A Calibration Check Form
 - A Calibration Form (if necessary)
 - A Sampling Event Data Form
 - A Sampling Data Form for each sampling location
 - Photographs
10. Transfer field data to digital spreadsheet.
11. Email scanned field data pages, photographs, and field data spreadsheet to Dan Engel (dengel@barr.com).

Reminders/Tips:

Don't change sensor cap without changing the calibration values in the instrument.

Be sure that instrument cable is vertical in the water, so depth measurements are accurate.

Don't let the tip of the sensor dry out (sponge in gray tube should be wet at all times).

Direct questions to Dan Engel at Barr Engineering Company (dengel@barr.com; 218-410-1579).

ODO200 Calibration Check Procedure

Date/Time: _____

Staff Name(s): _____

1 Saturate sponge inside gray sensor cover with fresh tap water; pour out excess.

2 Remove sensor guard (not sensor cap), and dry off temperature and DO sensors.

3 Replace sensor guard onto sensor.

4 Place sensor (with guard) inside gray sensor cover.

5 Turn on ODO200 instrument, wait 10 minutes for sensors to stabilize.

6 Local barometric pressure from www.weather.gov (inches Hg): _____

7 Convert local barometric pressure from "inches Hg" to "mm Hg":
Multiply value from Step 6 by **25.4** to get BP in units of "mm Hg": _____

8 Determine true local barometric pressure (not elevation-adjusted) in mm Hg¹:
Subtract **29.0** from Step 7 result to get true barometric pressure: _____

9 Calibration value for current true barometric pressure²: _____

10 Current DO measurement (% saturation): _____

Don't Absolute value of difference between DO measurement and calibration value:

| (Step 9 value) - (Step 10 value) | : _____

12 Calibration needed? (circle one) Yes No

If difference is ≤ 2 , current calibration is **acceptable**.

If difference is > 2 , current calibration is **unacceptable, and unit should be calibrated**.

¹ This calculation assumes that the calibration check is performed at the BPU dam break room, which has an elevation of approximately 1,160 feet above mean sea level. See page 10 of operation manual for the detailed calculation.

² See Appendix A of the YSI200 Operation Manual to determine the calibration value (using the local, true, barometric pressure value).

APPENDIX A-DO% CALIBRATION VALUES

Calibration Value	Pressure			
	in Hg	mmHg	kPa	mbar
101%	30.22	767.6	102.34	1023.38
100%	29.92	760.0	101.33	1013.25
99%	29.62	752.4	100.31	1003.12
98%	29.32	744.8	99.30	992.99
97%	29.02	737.2	98.29	982.85
96%	28.72	729.6	97.27	972.72
95%	28.43	722.0	96.26	962.59
94%	28.13	714.4	95.25	952.46
93%	27.83	706.8	94.23	942.32
92%	27.53	699.2	93.22	932.19
91%	27.23	691.6	92.21	922.06
90%	26.93	684.0	91.19	911.93
89%	26.63	676.4	90.18	901.79
88%	26.33	668.8	89.17	891.66
87%	26.03	661.2	88.15	881.53
86%	25.73	653.6	87.14	871.40
85%	25.43	646.0	86.13	861.26
84%	25.13	638.4	85.11	851.13
83%	24.83	630.8	84.10	841.00
82%	24.54	623.2	83.09	830.87
81%	24.24	615.6	82.07	820.73
80%	23.94	608.0	81.06	810.60
79%	23.64	600.4	80.05	800.47
78%	23.34	592.8	79.03	790.34
77%	23.04	585.2	78.02	780.20
76%	22.74	577.6	77.01	770.07
75%	22.44	570.0	75.99	759.94
74%	22.14	562.4	74.98	749.81
73%	21.84	554.8	73.97	739.67
72%	21.54	547.2	72.95	729.54

ODO200 Calibration Procedure

Date/Time: _____

Staff Name(s): _____

- 1 Saturate sponge inside gray sensor cover with fresh tap water; pour out excess.
- 2 Remove sensor guard (not sensor cap), and dry off temperature and DO sensors.
- 3 Replace sensor guard onto sensor.
- 4 Place sensor (with guard) inside gray sensor cover.
- 5 Turn on ODO200 instrument, wait 10 minutes for sensors to stabilize.
- 6 Local barometric pressure from www.weather.gov (inches Hg): _____
- 7 Convert local barometric pressure from "inches Hg" to "mm Hg":
Multiply value from Step 6 by **25.4** to get BP in units of "mm Hg": _____
- 8 Determine true local barometric pressure (not elevation-adjusted) in mm Hg:
Subtract **29.0** from Step 7 result to get true barometric pressure¹: _____
- 9 Convert true barometric pressure from "mm Hg" to "millibars":
Multiply value from Step 8 by **1.333**: _____
- 10 Press "CAL" button on instrument.
- 11 Use the Up/Down buttons to select the true, local barometric pressure (in millibars).
Use value from Step 9; select closest integer.
- 12 Press "Enter" button.
- 13 When prompted to enter a salinity value, leave at "0 ppt".
- 14 Press "Enter" button; calibration is complete.

¹ This calculation assumes that the calibration is performed at the BPU dam break room, which has an elevation of approximately 1,160 feet above mean sea level. See page 10 of operation manual for the detailed calculation.

² See Appendix A of the YSI200 Operation Manual for calibration values.

Sampling Event Data

Sampling Event Date:	
Sampling Start Time:	Sampling End Time:
Sampler(s):	
Current Weather Conditions:	
Recent Weather (past few days):	
Reservoir Water Elevation (feet*):	
Downstream Water Elevation (feet*):	
Flow @ USGS gauge #05242300 (cfs):	
Spillway Flowage (cfs):	
Generator 1 (% speed):	
Generator 2 (% speed):	
Generator 3 (% speed):	
Generator 4 (% speed):	
Generator 5 (% speed):	
Water Condition (Odor, Color, Clarity, etc.):	
Hydrology/Sampling Comments:	

*BPU facility reports elevation according to Memphis Datum; subtract 8.16 feet to convert to NGVD 29.

Sampling Data

Sampling Location:

Sampling Date:

Sampling Time:

Total Water Depth:

Habitat (Pool, Run, Riffle):

Sampling Depth (feet)	Dissolved Oxygen (mg/L)	Dissolved Oxygen (% Saturation)	Water Temperature (°C)
3			
6			
9			
12			
15			
18			
21			
24			
27			
30			
33			

Comments:

Sampling Data

Sampling Location:

Sampling Date:

Sampling Time:

Total Water Depth:

Habitat (Pool, Run, Riffle):

Sampling Depth (feet)	Dissolved Oxygen (mg/L)	Dissolved Oxygen (% Saturation)	Water Temperature (°C)
3			
6			
9			
12			
15			
18			
21			
24			
27			
30			
33			

Comments:

Sampling Data

Sampling Location:

Sampling Date:

Sampling Time:

Total Water Depth:

Habitat (Pool, Run, Riffle):

Sampling Depth (feet)	Dissolved Oxygen (mg/L)	Dissolved Oxygen (% Saturation)	Water Temperature (°C)
3			
6			
9			
12			
15			
18			
21			
24			
27			
30			
33			

Comments:

Sampling Data

Sampling Location:

Sampling Date:

Sampling Time:

Total Water Depth:

Habitat (Pool, Run, Riffle):

Sampling Depth (feet)	Dissolved Oxygen (mg/L)	Dissolved Oxygen (% Saturation)	Water Temperature (°C)
3			
6			
9			
12			
15			
18			
21			
24			
27			
30			
33			

Comments:

Sampling Data

Sampling Location:

Sampling Date:

Sampling Time:

Total Water Depth:

Habitat (Pool, Run, Riffle):

Sampling Depth (feet)	Dissolved Oxygen (mg/L)	Dissolved Oxygen (% Saturation)	Water Temperature (°C)
3			
6			
9			
12			
15			
18			
21			
24			
27			
30			
33			

Comments:

Appendix B

Dissolved Oxygen and Temperature Data Table

				Dissolved Oxygen (mg/L)										
Week	Sample Date	Sample Location	Sample Time	3 ft	6 ft	9 ft	12 ft	15 ft	18 ft	21 ft	24 ft	27 ft	30 ft	33 ft
1	5/28/19	Upstream	14:16	8.90	8.90									
	5/28/19	Site 1	13:46	9.95	9.92	9.92	9.90	9.88	9.87	9.88	9.87			
	5/28/19	Site 2	13:40	9.86	9.86	9.83	9.82	9.80	9.79	9.78	9.78	9.78	9.74	9.76
	5/28/19	Site 3	13:30	9.98	10.00	10.00								
2	6/6/19	Site 1	10:12	7.53	7.49	7.48	7.46	7.44	7.41	7.40	7.40			
	6/6/19	Site 2	10:03	8.37	8.26	8.18	7.77	8.13	8.17	7.64	7.81	7.79	7.69	7.71
	6/6/19	Site 3	10:10	7.53	7.49	7.48	7.46	7.44	7.41	7.40	7.40			
	6/6/19	Upstream	11:17	7.48	7.51									
3	6/13/19	Site 1	10:33	7.42	7.46	7.32	7.27	7.23						
	6/13/19	Site 2	10:10	7.93	7.92	7.91	7.90	7.86	7.84	7.82	7.80	7.77	7.72	
	6/13/19	Site 3	10:00	7.94	7.95	7.93	7.91							
	6/13/19	Upstream	11:00	7.26	7.26									
4	6/20/19	Site 1	10:08	7.53	7.51	7.49	7.47	7.46	7.44					
	6/20/19	Site 2	9:44	7.81	7.80	7.78	7.80	7.78	7.76	7.75	7.72	7.70		
	6/20/19	Site 3	9:36	7.85	7.91	7.87	7.89	7.84	7.92					
	6/20/19	Upstream	10:35	7.58	7.57									
5	6/27/19	Site 1	9:15	7.32	7.30	7.28	7.25	7.03						
	6/27/19	Site 2	9:07	7.43	7.38	7.35	7.35	7.39	7.39	7.35				
	6/27/19	Site 3	9:00	7.62	7.59	7.57	7.56	7.53	7.52	7.49	7.48			
	6/27/19	Upstream	9:45	7.48	7.47									
6	7/2/19	Site 1	9:07	7.32	7.32	7.31	7.32	7.31	7.29	7.28	7.27			
	7/2/19	Site 2	9:14	7.31	7.30	7.30	7.29	7.27	7.26	7.25	7.23	7.20		
	7/2/19	Site 3	9:00	7.36	7.34	7.33	7.32	7.30	7.29	7.29	7.28			
	7/2/19	Upstream	9:41	6.34	6.33									
7	7/11/19	Site 1	9:50	6.85	6.88	6.85	6.84	6.81	6.81					
	7/11/19	Site 2	9:45	6.87	6.85	6.84	6.81	6.82	6.80	6.79				
	7/11/19	Site 3	9:30	6.84	6.82	6.81	6.81	6.78	6.76	6.75	6.73			
	7/11/19	Upstream	10:25	5.50	5.44									
8	7/16/19	Site 1	13:53	5.17	5.16	5.14	5.13	5.12	5.10	5.08				
	7/16/19	Site 2	13:47	5.25	5.22	5.20	5.18	5.14	5.13	5.11	5.10			
	7/16/19	Site 3	13:37	5.28	5.25	5.16	5.12	5.38	5.63	5.54				
	7/16/19	Upstream	14:18	5.22	5.23									
9	7/26/19	Site 1	9:32	6.32	6.31	6.29	6.28	6.26	6.25	6.23				
	7/26/19	Site 2	9:23	6.57	6.47	6.37	6.33	6.36	6.33	6.24	6.27	6.48	6.49	
	7/26/19	Site 3	9:16	6.88	6.86	6.68	6.92	6.77	6.71	6.68				
	7/26/19	Upstream	10:19	6.43	6.42									
10	7/31/19	Site 1	11:00	6.42	6.40	6.38	6.35	6.34	6.33	6.32				
	7/31/19	Site 2	10:55	6.47	6.45	6.43	6.42	6.41	6.39	6.28	6.36			
	7/31/19	Site 3	10:45	6.70	7.03	6.80	6.76	6.88	6.77	6.83	6.78			
	7/31/19	Upstream	11:29	6.70	6.65									
11	8/8/19	Site 1	10:35	6.18	6.16	6.14	6.12	6.13	6.14					
	8/8/19	Site 2	10:30	6.24	6.25	6.29	6.27	6.21	6.20	6.25	6.23	6.15		
	8/8/19	Site 3	10:22	6.65	6.67	6.62	6.61	6.55	6.46	6.50				
	8/8/19	Upstream	11:04	6.24	6.21									
12	8/16/19	Site 1	11:58	6.73	6.69	6.69	6.69	6.67	6.67					
	8/16/19	Site 2	11:53	6.79	6.77	6.75	6.74	6.74	6.73	6.79	6.75	6.69		
	8/16/19	Site 3	11:46	6.89	6.87	6.85	6.84	6.81	6.80	6.77	6.76	6.76		
	8/16/19	Upstream	12:33	6.94	6.94									
13	8/22/19	Site 1	13:53	6.90	6.93	6.90	6.95	6.95						
	8/22/19	Site 2	13:48	7.15	7.13	7.13	7.12	7.08	7.06	7.04	7.03	7.02		
	8/22/19	Site 3	13:42	7.16	7.15	7.13	7.11	7.09	7.08	7.07	7.06	7.05		
	8/22/19	Upstream	13:42	7.29	7.28									
14	8/30/19	Site 1	13:42	7.84	7.82	7.80	7.79	7.79	7.80	7.79				
	8/30/19	Site 2	13:36	7.88	7.86	7.85	7.83	7.80	7.79	7.79	7.80	7.79		
	8/30/19	Site 3	13:29	7.85	7.83	7.77	7.73	7.72	7.70	7.66	7.63			
	8/30/19	Upstream	14:29	8.14	8.10									
15	9/5/19	Site 1	13:47	7.86	7.85	7.82	7.81	7.80	7.79					
	9/5/19	Site 2	13:41	7.86	7.85	7.84	7.82	7.81	7.79	7.78	7.77			
	9/5/19	Site 3	13:35	7.92	7.89	7.84	7.83	7.81	7.79	7.76	7.74	7.71		
	9/5/19	Upstream	14:16	7.85	7.84									
16	9/13/19	Site 1	13:31	8.30	8.29	8.27	8.26	8.27	8.25					
	9/13/19	Site 2	13:27	8.35	8.33	8.33	8.30	8.27	8.27	8.24	8.23	8.22		
	9/13/19	Site 3	13:20	8.47	8.45	8.44	8.40	8.37	8.37	8.33	8.29	8.27		
	9/13/19	Upstream	13:57	8.41	8.38									
17	9/19/19	Site 1	14:18	7.66	7.65	7.64	7.63	7.62	7.61	7.60				
	9/19/19	Site 2	14:13	7.73	7.71	7.68	7.67	7.65	7.62	7.60	7.59	7.58	7.56	
	9/19/19	Site 3	14:07	8.09	8.07	8.07	8.06	7.99	7.98	7.89	7.85	7.70		
	9/19/19													
18	9/27/19	Site 1	9:21	8.11	7.87	7.84	7.91	7.91	8.02					
	9/27/19	Site 2	9:13	8.34	8.33	8.31	8.30	8.29	8.28	8.29	8.28	8.25		
	9/27/19	Site 3	9:08	8.27	8.28	8.26	8.26	8.25	8.23	8.23	8.22	8.19		
	9/27/19	Upstream	9:49	7.67	7.64									

				Dissolved Oxygen (% Saturation)										
Week	Sample Date	Sample Location	Sample Time	3 ft	6 ft	9 ft	12 ft	15 ft	18 ft	21 ft	24 ft	27 ft	30 ft	33 ft
1	5/28/19	Upstream	14:16	85.9	85.8									
	5/28/19	Site 1	13:46	95.4	95.2	95.2	95.0	94.9	94.7	94.4	94.5			
	5/28/19	Site 2	13:40	94.6	94.4	94.3	94.2	94.0	93.8	93.7	93.8	93.7	93.6	93.7
	5/28/19	Site 3	13:30	95.8	95.9	95.7								
2	6/6/19	Site 1	10:12	83.0	82.5	82.1	81.9	81.8	81.4	81.3	81.1			
	6/6/19	Site 2	10:03	91.5	91.1	89.4	88.7	90.2	89.9	84.4	84.2	85.3	85.1	85.5
	6/6/19	Site 3	10:10	83.0	82.5	82.1	81.9	81.8	81.4	81.3	81.3			
	6/6/19	Upstream	11:17	82.8	82.7									
3	6/13/19	Site 1	10:33	81.0	80.7	80.5	79.8	79.1						
	6/13/19	Site 2	10:10	87.0	86.7	86.6	86.5	86.2	85.9	85.7	85.3	84.9	84.7	
	6/13/19	Site 3	10:00	86.8	87.1	86.9	86.7							
	6/13/19	Upstream	11:00	79.8	79.6									
4	6/20/19	Site 1	10:08	83.2	82.9	82.8	82.6	82.4	82.2					
	6/20/19	Site 2	9:44	86.2	86.1	85.8	86.0	85.9	85.6	85.5	85.2	84.9		
	6/20/19	Site 3	9:36	86.7	87.2	86.9	87.1	86.6	86.0					
	6/20/19	Upstream	10:35	83.9	83.7									
5	6/27/19	Site 1	9:15	82.4	82.1	81.8	81.6	81.2						
	6/27/19	Site 2	9:07	82.9	83.4	82.8	83.2	83.2	83.5	83.5				
	6/27/19	Site 3	9:00	85.9	85.5	85.4	85.1	84.6	84.6	84.4	85.1			
	6/27/19	Upstream	9:45	84.4	84.1									
6	7/2/19	Site 1	9:07	85.3	85.2	85.1	85.2	85.1	84.8	84.7	84.6			
	7/2/19	Site 2	9:14	85.3	85.1	85.0	84.9	84.6	84.6	84.5	83.9	83.9		
	7/2/19	Site 3	9:00	85.9	85.5	85.4	85.3	85.1	84.9	84.8	84.8			
	7/2/19	Upstream	9:41	74.1	73.9									
7	7/11/19	Site 1	9:50	81.4	81.3	81.2	80.4	80.3	80.3					
	7/11/19	Site 2	9:45	81.2	81.1	80.8	80.6	80.5	80.4	80.1				
	7/11/19	Site 3	9:30	81.0	80.6	80.5	80.4	80.2	79.8	79.7	79.5			
	7/11/19	Upstream	10:25	65.1	64.5									
8	7/16/19	Site 1	13:53	63.1	63.2	63.0	62.8	62.7	62.4	62.2				
	7/16/19	Site 2	13:47	64.5	63.9	63.7	63.4	63.0	62.7	62.6	62.3			
	7/16/19	Site 3	13:37	64.2	64.0	63.1	63.7	64.5	65.8	65.7				
	7/16/19	Upstream	14:18	64.7	64.3									
9	7/26/19	Site 1	9:32	75.5	75.3	75.2	74.8	74.8	74.6	74.4				
	7/26/19	Site 2	9:23	78.7	76.1	75.9	75.3	76.4	75.1	74.5	74.6	76.6	76.4	
	7/26/19	Site 3	9:16	82.5	81.9	80.3	81.1	81.0	80.2	79.6				
	7/26/19	Upstream	10:19	76.8	76.6									
10	7/31/19	Site 1	11:00	74.9	74.9	74.7	74.4	74.3	74.0	73.8				
	7/31/19	Site 2	10:55	75.9	75.5	75.3	75.1	75.0	74.8	74.7	74.5			
	7/31/19	Site 3	10:45	77.8	81.4	81.0	80.4	80.4	79.2	80.2	79.5			
	7/31/19	Upstream	11:29	78.7	77.9									
11	8/8/19	Site 1	10:35	74.1	73.8	73.7	73.5	73.4	73.4					
	8/8/19	Site 2	10:30	75.0	74.9	75.3	74.7	74.6	74.7	75.0	74.3	74.2		
	8/8/19	Site 3	10:22	81.1	80.1	79.5	79.0	78.3	77.8	78.2				
	8/8/19	Upstream	11:04	75.0	74.4									
12	8/16/19	Site 1	11:58	77.4	77.0	77.0	77.1	76.8	76.8					
	8/16/19	Site 2	11:53	78.4	78.1	77.9	77.7	77.6	77.7	78.2	77.6	77.2		
	8/16/19	Site 3	11:46	79.5	79.4	79.0	78.8	78.6	78.3	78.2	78.2	78.2		
	8/16/19	Upstream	12:33	80.8	80.6									
13	8/22/19	Site 1	13:53	80.4	79.9	80.1	80.6	80.6						
	8/22/19	Site 2	13:48	83.3	83.0	83.0	82.9	82.6	82.3	82.2	81.9	81.6		
	8/22/19	Site 3	13:42	83.4	83.1	83.0	82.7	82.5	82.4	82.1	82.1	82.0		
	8/22/19	Upstream	13:42	85.7	85.4									
14	8/30/19	Site 1	13:42	84.2	84.3	84.1	83.8	84.0	84.2	84.0				
	8/30/19	Site 2	13:36	85.2	85.0	84.8	84.7	84.4	84.0	84.1	84.2	84.2		
	8/30/19	Site 3	13:29	85.1	85.0	83.9	83.4	83.1	83.1	82.5	82.3			
	8/30/19	Upstream	14:29	88.9	88.5									
15	9/5/19	Site 1	13:47	84.8	84.6	84.3	84.2	84.1	84.0					
	9/5/19	Site 2	13:41	84.9	84.6	84.6	84.5	84.3	84.0	83.9	83.9			
	9/5/19	Site 3	13:35	86.0	85.0	84.8	84.5	84.2	84.0	83.7	83.5	83.2		
	9/5/19	Upstream	14:16	84.9	84.7									
16	9/13/19	Site 1	13:31	84.4	84.1	84.0	83.9	84.0	83.8					
	9/13/19	Site 2	13:27	84.9	84.6	84.6	84.1	83.9	83.9	83.7	83.6	83.5		
	9/13/19	Site 3	13:20	86.2	85.9	85.8	85.2	85.0	85.0	84.6	84.1	83.9		
	9/13/19	Upstream	13:57	85.5	84.8									
17	9/19/19	Site 1	14:18	83.0	83.0	82.8	82.6	82.5	82.4	82.3				
	9/19/19	Site 2	14:13	83.6	83.4	83.2	83.1	82.4	82.4	82.3	82.0	82.0	81.7	
	9/19/19	Site 3	14:07	87.3	88.0	87.5	87.3	86.8	86.1	85.6	85.2	83.8		
	9/19/19													
18	9/27/19	Site 1	9:21	85.4	81.8	81.2	81.0	81.1	82.3					
	9/27/19	Site 2	9:13	85.3	85.3	85.1	85.0	84.8	84.8	84.9	84.6	84.6		
	9/27/19	Site 3	9:08	85.1	84.9	84.7	84.8	84.8	84.6	84.6	84.2	84.0		
	9/27/19	Upstream	9:49	78.5	78.1									

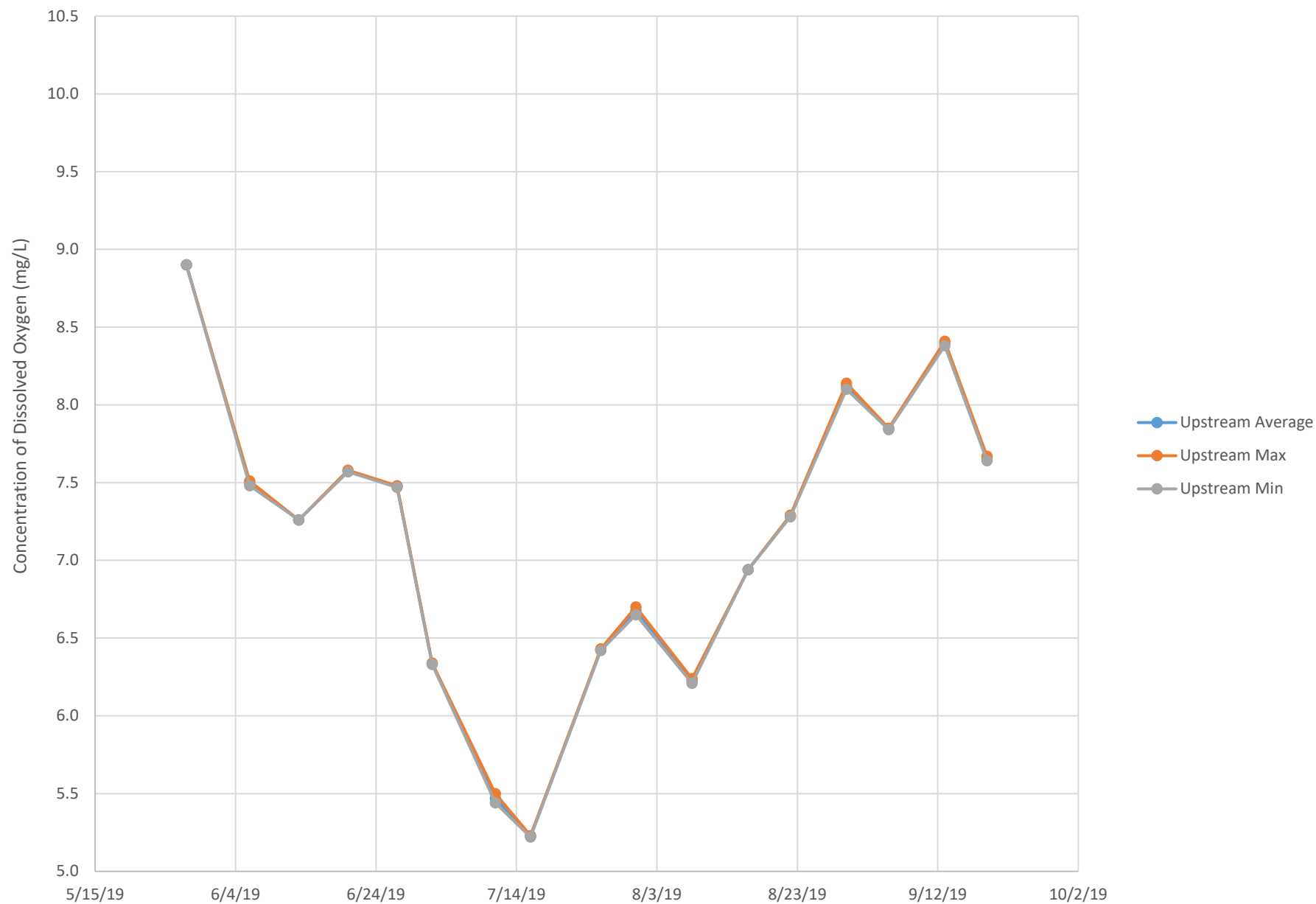
				Water Temperature (°C)										
Week	Sample Date	Sample Location	Sample Time	3 ft	6 ft	9 ft	12 ft	15 ft	18 ft	21 ft	24 ft	27 ft	30 ft	33 ft
1	5/28/19	Upstream	14:16	13.8	13.8									
	5/28/19	Site 1	13:46	13.5	13.5	13.5	13.5	13.5	13.5	13.5	13.5			
	5/28/19	Site 2	13:40	13.5	13.5	13.5	13.5	13.5	13.4	13.4	13.5	13.5	13.5	13.5
	5/28/19	Site 3	13:30	13.5	13.5	13.5								
2	6/6/19	Site 1	10:12	19.9	19.9	19.9	19.9	19.9	19.9	19.9	19.9			
	6/6/19	Site 2	10:03	19.9	19.9	19.9	19.9	20.0	19.9	19.9	19.9	19.9	19.9	19.9
	6/6/19	Site 3	10:10	19.9	19.9	19.9	19.9	19.9	19.9	19.9	19.9			
	6/6/19	Upstream	11:17	20.3	20.1									
3	6/13/19	Site 1	10:33	19.8	19.8	19.8	19.8	19.8						
	6/13/19	Site 2	10:10	19.8	19.8	19.8	19.8	19.8	19.8	19.8	19.8	19.8	19.8	
	6/13/19	Site 3	10:00	19.8	19.8	19.8	19.8							
	6/13/19	Upstream	11:00	19.8	19.8									
4	6/20/19	Site 1	10:08	20.2	20.2	20.2	20.2	20.2	20.2					
	6/20/19	Site 2	9:44	20.2	20.2	20.2	20.2	20.2	20.2	20.2	20.2	20.2		
	6/20/19	Site 3	9:36	20.2	20.2	20.2	20.2	20.2	20.2					
	6/20/19	Upstream	10:35	20.2	20.2									
5	6/27/19	Site 1	9:15	21.1	21.1	21.2	21.2	21.2						
	6/27/19	Site 2	9:07	21.2	21.2	21.2	21.2	21.2	21.2	21.2				
	6/27/19	Site 3	9:00	21.2	21.2	21.2	21.2	21.2	21.2	21.2	21.2			
	6/27/19	Upstream	9:45	21.2	21.2									
6	7/2/19	Site 1	9:07	23.0	23.0	23.0	23.0	23.0	23.0	23.0	23.0			
	7/2/19	Site 2	9:14	23.0	23.0	23.0	23.0	23.0	23.0	23.0	23.0	23.0		
	7/2/19	Site 3	9:00	23.0	23.0	23.0	23.0	23.0	23.0	23.0	23.0			
	7/2/19	Upstream	9:41	23.1	23.1									
7	7/11/19	Site 1	9:50	23.8	23.8	23.8	23.8	23.8	23.8					
	7/11/19	Site 2	9:45	23.7	23.8	23.8	23.8	23.8	23.8	23.8				
	7/11/19	Site 3	9:30	23.7	23.7	23.7	23.7	23.7	23.7	23.7	23.7			
	7/11/19	Upstream	10:25	23.9	23.9									
8	7/16/19	Site 1	13:53	25.7	25.6	25.6	25.6	25.6	25.6	25.6				
	7/16/19	Site 2	13:47	25.7	25.7	25.7	25.6	25.6	25.6	25.6	25.6			
	7/16/19	Site 3	13:37	25.6	25.6	25.6	25.6	25.6	25.6	25.6				
	7/16/19	Upstream	14:18	26.1	26.0									
9	7/26/19	Site 1	9:32	24.3	24.3	24.3	24.3	24.3	24.3	24.3				
	7/26/19	Site 2	9:23	24.2	24.3	24.3	24.3	24.3	24.3	24.3	24.3	24.3	24.3	
	7/26/19	Site 3	9:16	24.2	24.2	24.2	24.2	24.3	24.3	24.3				
	7/26/19	Upstream	10:19	24.2	24.3									
10	7/31/19	Site 1	11:00	23.2	23.2	23.2	23.2	23.2	23.2	23.2				
	7/31/19	Site 2	10:55	23.2	23.2	23.2	23.2	23.2	23.2	23.2	23.2			
	7/31/19	Site 3	10:45	23.2	23.2	23.2	23.2	23.2	23.2	23.2	23.2			
	7/31/19	Upstream	11:29	23.4	23.3									
11	8/8/19	Site 1	10:35	24.5	24.5	24.5	24.5	24.5	24.5					
	8/8/19	Site 2	10:30	24.5	24.5	24.5	24.5	24.5	24.5	24.5	24.5	24.5		
	8/8/19	Site 3	10:22	24.5	24.5	24.5	24.5	24.5	24.5					
	8/8/19	Upstream	11:04	24.5	24.5									
12	8/16/19	Site 1	11:58	22.4	22.4	22.4	22.4	22.4	22.4					
	8/16/19	Site 2	11:53	22.5	22.5	22.5	22.5	22.4	22.4	22.4	22.4	22.4		
	8/16/19	Site 3	11:46	22.4	22.4	22.4	22.4	22.4	22.4	22.4	22.4	22.4		
	8/16/19	Upstream	12:33	22.9	22.9									
13	8/22/19	Site 1	13:53	22.7	22.8	22.8	22.8	22.8						
	8/22/19	Site 2	13:48	23.0	23.0	23.0	22.9	23.0	23.0	23.0	23.0	23.0		
	8/22/19	Site 3	13:42	22.9	22.9	22.9	22.9	22.9	22.9	22.9	22.9	22.9		
	8/22/19	Upstream	13:42	23.4	23.4									
14	8/30/19	Site 1	13:42	19.1	19.1	19.1	19.0	19.0	19.1	19.1				
	8/30/19	Site 2	13:36	19.1	19.1	19.1	19.1	19.1	19.1	19.1	19.1	19.1		
	8/30/19	Site 3	13:29	19.2	19.3	19.1	19.1	19.1	19.1	19.1	19.0			
	8/30/19	Upstream	14:29	19.6	19.7									
15	9/5/19	Site 1	13:47	19.0	19.0	19.0	19.0	19.0	19.0					
	9/5/19	Site 2	13:41	19.0	19.0	19.0	19.0	19.0	19.0	19.0	19.0			
	9/5/19	Site 3	13:35	19.2	19.1	19.1	19.1	19.1	19.0	19.0	19.0	19.0		
	9/5/19	Upstream	14:16	19.1	19.1									
16	9/13/19	Site 1	13:31	16.1	16.1	16.1	16.1	16.1	16.1					
	9/13/19	Site 2	13:27	16.1	16.1	16.1	16.1	16.1	16.1	16.1	16.1	16.1		
	9/13/19	Site 3	13:20	16.2	16.2	16.1	16.1	16.1	16.1	16.1	16.1	16.1		
	9/13/19	Upstream	13:57	16.0	16.0									
17	9/19/19	Site 1	14:18	19.2	19.2	19.2	19.2	19.2	19.2	19.2				
	9/19/19	Site 2	14:13	19.2	19.2	19.2	19.2	19.2	19.2	19.2	19.2	19.2	19.2	
	9/19/19	Site 3	14:07	19.3	19.3	19.3	19.3	19.2	19.2	19.2	19.2	19.2		
	9/19/19													
18	9/27/19	Site 1	9:21	16.6	16.6	16.6	16.6	16.6	16.6					
	9/27/19	Site 2	9:13	16.6	16.6	16.6	16.6	16.6	16.6	16.6	16.6	16.6		
	9/27/19	Site 3	9:08	16.8	16.7	16.6	16.6	16.6	16.6	16.6	16.6	16.6		
	9/27/19	Upstream	9:49	16.9	16.8									

				Habitat (Pool, Run, Riffle)	Notes
Week	Sample Date	Sample Location	Sample Time		
1	5/28/19	Upstream	14:16	Run	Good Flow
	5/28/19	Site 1	13:46	Pool	Abundant foam, site at end of apron
	5/28/19	Site 2	13:40	Run	Abundant foam
	5/28/19	Site 3	13:30	Run	Abundant foam
2	6/6/19	Site 1	10:12	Pool	New sampling location at slide gate #1 approximatley 10' from intake
	6/6/19	Site 2	10:03	Run	
	6/6/19	Site 3	10:10	Pool	
	6/6/19	Upstream	11:17	Run	
3	6/13/19	Site 1	10:33	Pool	
	6/13/19	Site 2	10:10	Run	
	6/13/19	Site 3	10:00	Run	
	6/13/19	Upstream	11:00	Run	
4	6/20/19	Site 1	10:08	Pool	slower flows are helping us to get the sensor to the bottom of the river
	6/20/19	Site 2	9:44	Run	
	6/20/19	Site 3	9:36	Run	
	6/20/19	Upstream	10:35	Run	
5	6/27/19	Site 1	9:15	Pool	
	6/27/19	Site 2	9:07	Run	
	6/27/19	Site 3	9:00	Run	
	6/27/19	Upstream	9:45	Run	
6	7/2/19	Site 1	9:07	Run	foam floating on the water surface. Water very turbulent.
	7/2/19	Site 2	9:14	Run	foam floating on the water surface. Water very turbulent.
	7/2/19	Site 3	9:00	Run	foam floating on the water surface
	7/2/19	Upstream	9:41	Run	
7	7/11/19	Site 1	9:50	Run	
	7/11/19	Site 2	9:45	Run	
	7/11/19	Site 3	9:30	Run	
	7/11/19	Upstream	10:25	Riffle	
8	7/16/19	Site 1	13:53	Riffle	water flow (cfs) over the spillway has slowed down
	7/16/19	Site 2	13:47	Pool	water flow (cfs) over the spillway has slowed down
	7/16/19	Site 3	13:37	Pool	water flow (cfs) over the spillway has slowed down
	7/16/19	Upstream	14:18	Run	
	7/16/19				
9	7/26/19	Site 1	9:32	Run	
	7/26/19	Site 2	9:23	Run	
	7/26/19	Site 3	9:16	Run	
	7/26/19	Upstream	10:19	Run	
10	7/31/19	Site 1	11:00	Riffle	
	7/31/19	Site 2	10:55	Riffle	
	7/31/19	Site 3	10:45	Riffle	
	7/31/19	Upstream	11:29	Run	
11	8/8/19	Site 1	10:35	Riffle	
	8/8/19	Site 2	10:30		
	8/8/19	Site 3	10:22	Run	
	8/8/19	Upstream	11:04	Run	
12	8/16/19	Site 1	11:58	Run	
	8/16/19	Site 2	11:53	Riffle	
	8/16/19	Site 3	11:46	Riffle	
	8/16/19	Upstream	12:33	Riffle	
13	8/22/19	Site 1	13:53	Run	
	8/22/19	Site 2	13:48	Riffle	
	8/22/19	Site 3	13:42	Pool	
	8/22/19	Upstream	13:42	Riffle	
14	8/30/19	Site 1	13:42	Run	
	8/30/19	Site 2	13:36	Run	
	8/30/19	Site 3	13:29	Pool	
	8/30/19	Upstream	14:29	Run	
15	9/5/19	Site 1	13:47	Run	
	9/5/19	Site 2	13:41	Riffle	
	9/5/19	Site 3	13:35	Riffle	
	9/5/19	Upstream	14:16	Riffle	
16	9/13/19	Site 1	13:31	Run	Some Foam on Water Some Foam on Water
	9/13/19	Site 2	13:27	Run	
	9/13/19	Site 3	13:20	Riffle	
	9/13/19	Upstream	13:57	Run	
17	9/19/19	Site 1	14:18	Run	No foam coming out of the PowerHouse.
	9/19/19	Site 2	14:13	Riffle	Foam Blanket 10'X75' no other foam around it.
	9/19/19	Site 3	14:07	Run	Small amounts of foam on the water at this site.
	9/19/19			Run	Sampling from Slide Gate 2.
18	9/27/19	Site 1	9:21	Run	Foam floating on the water surface.
	9/27/19	Site 2	9:13	Run	Foam floating on the water surface.
	9/27/19	Site 3	9:08	Run	Foam floating on the water surface.
	9/27/19	Upstream	9:49	Run	Sampling from Slide Gate 2.

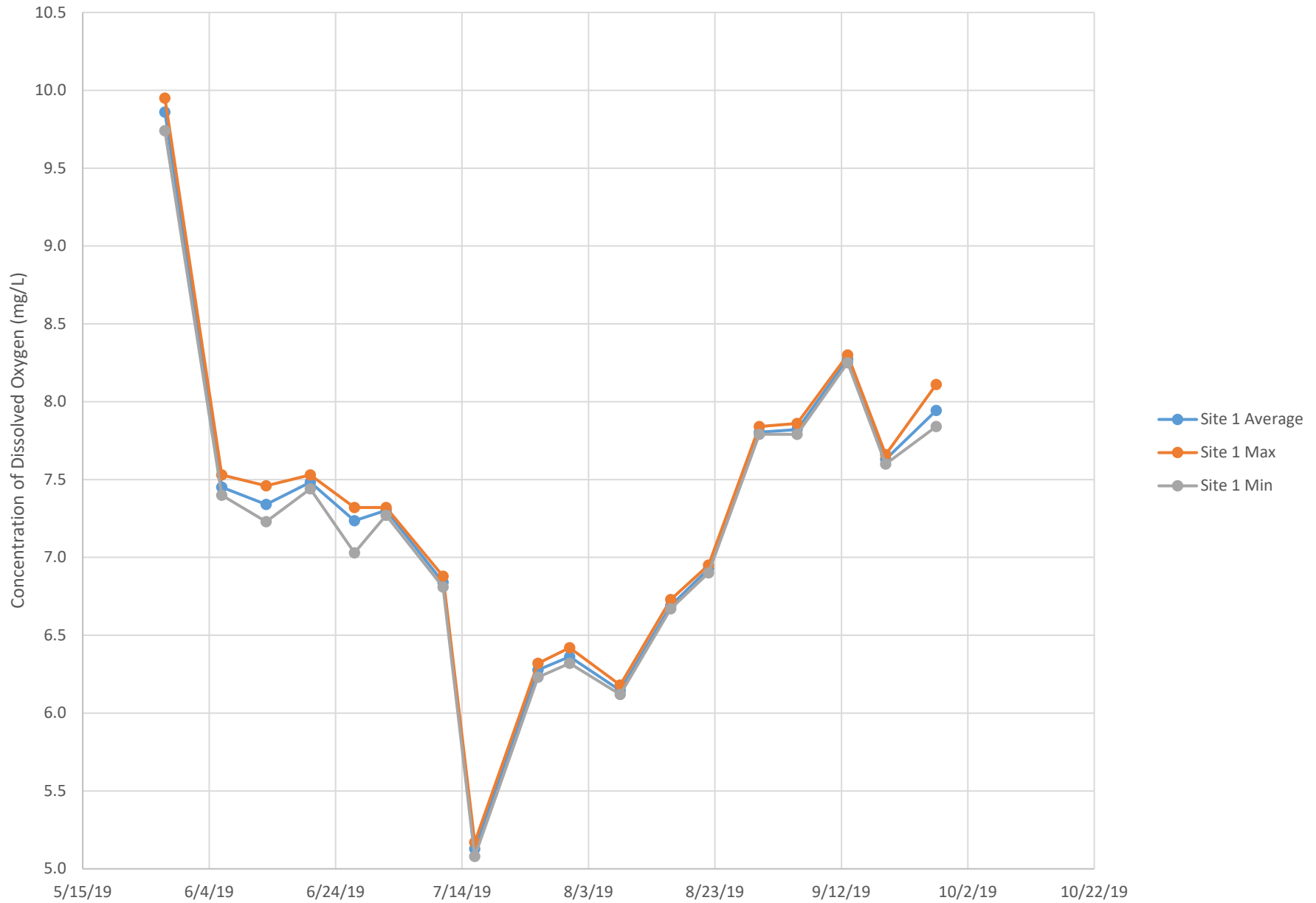
Appendix C

Dissolved Oxygen and Temperature Charts

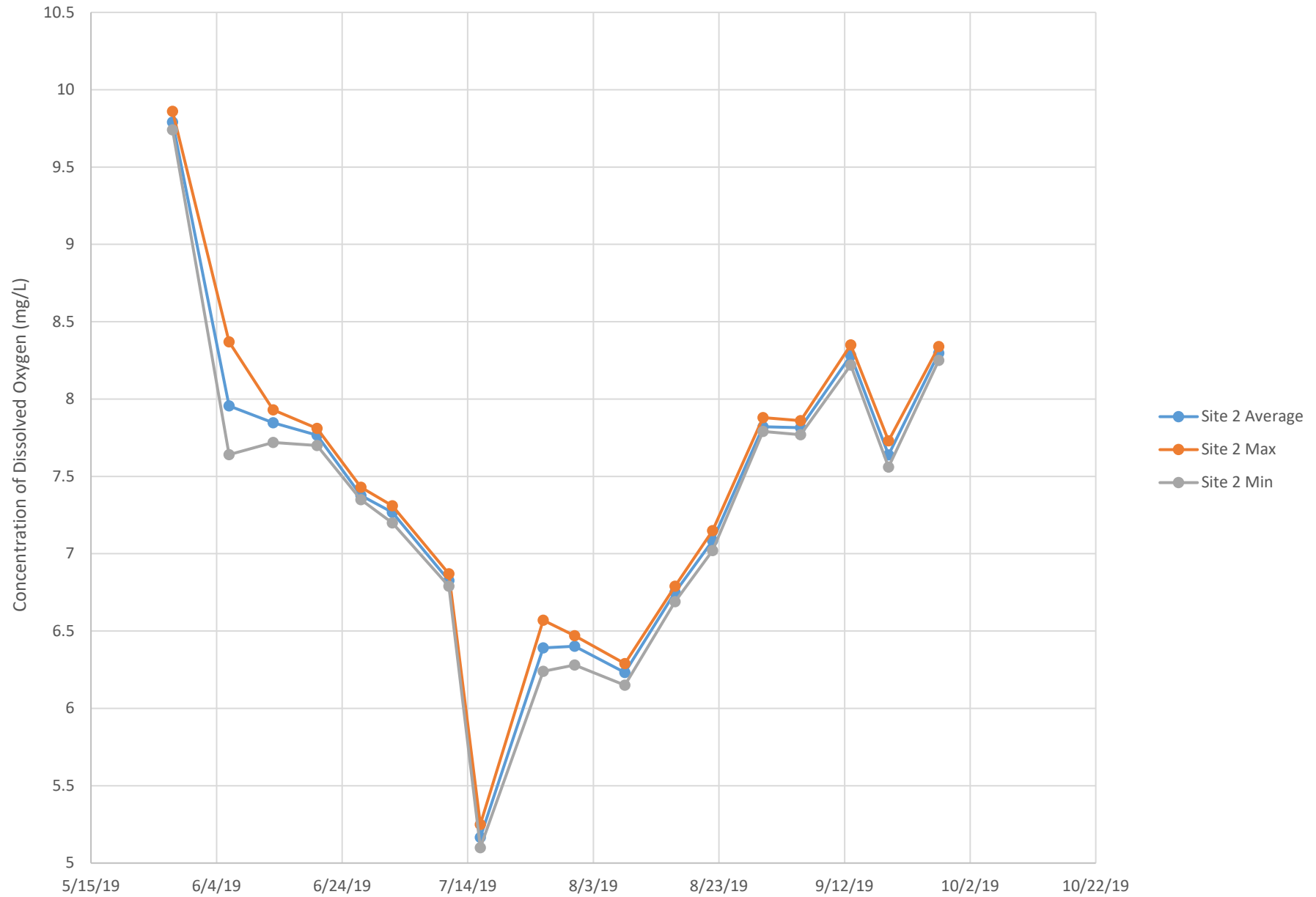
Dissolved Oxygen Concentrations at Upstream Monitoring Location



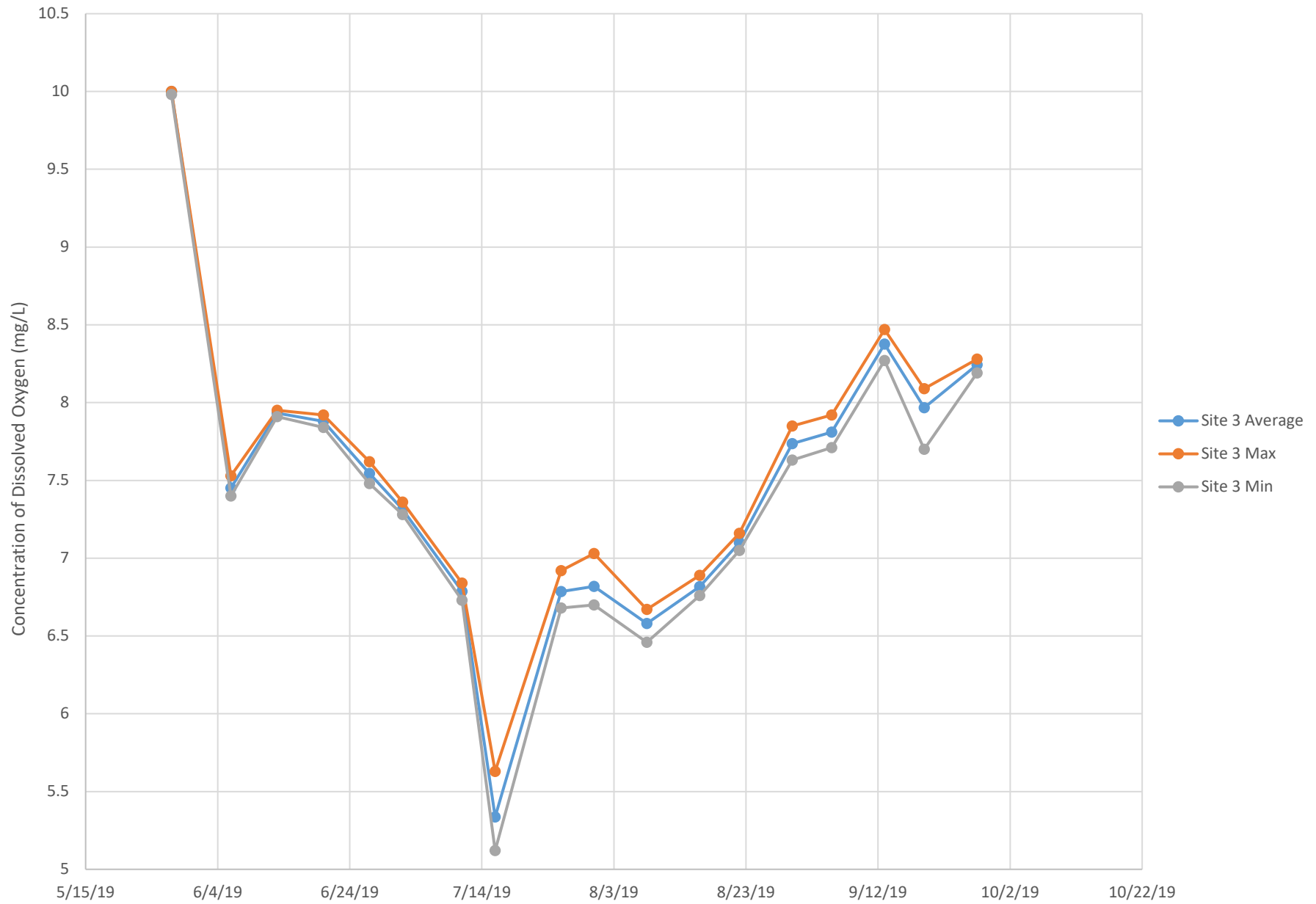
Dissolved Oxygen Concentrations at Site 1 Monitoring Location



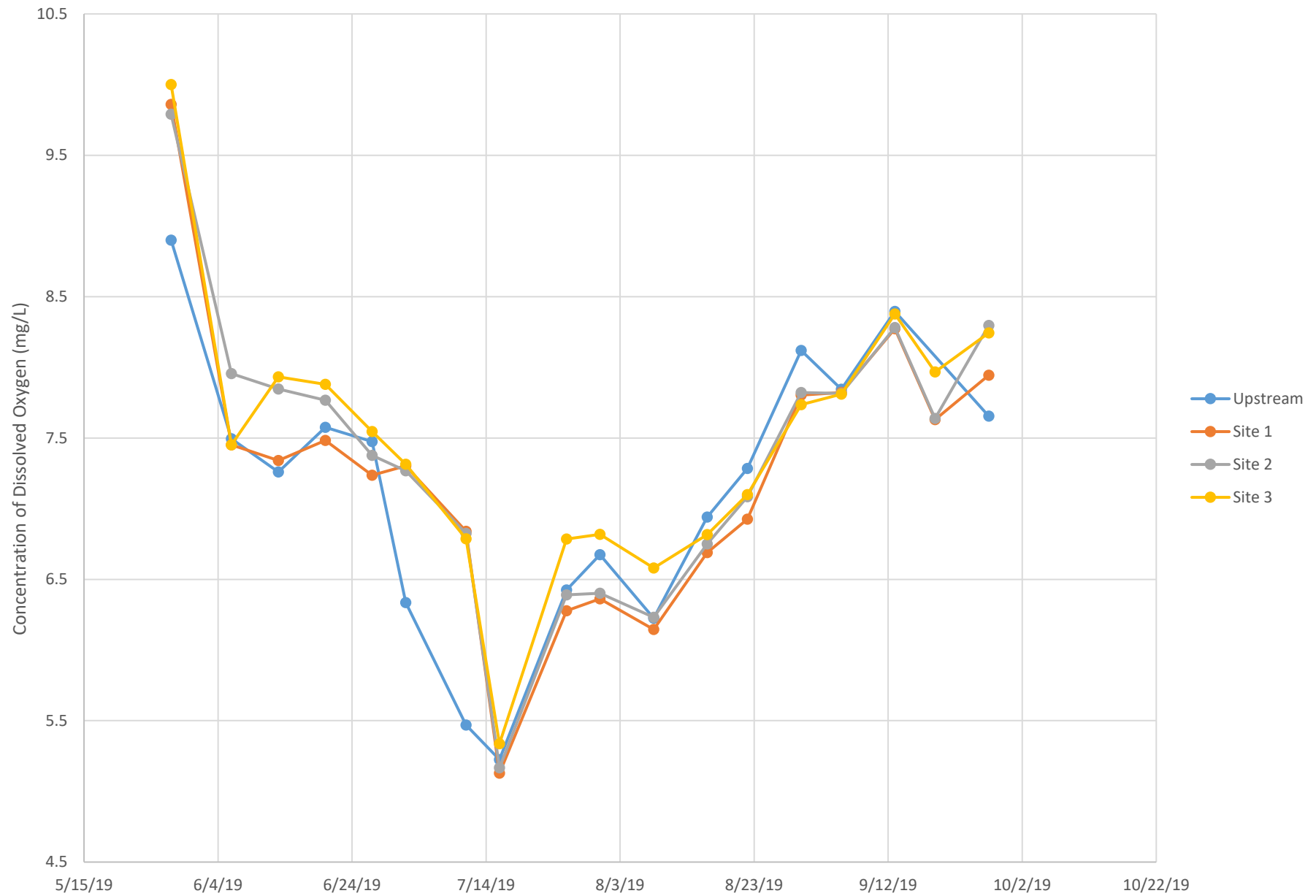
Dissolved Oxygen Concentrations at Site 2 Monitoring Location



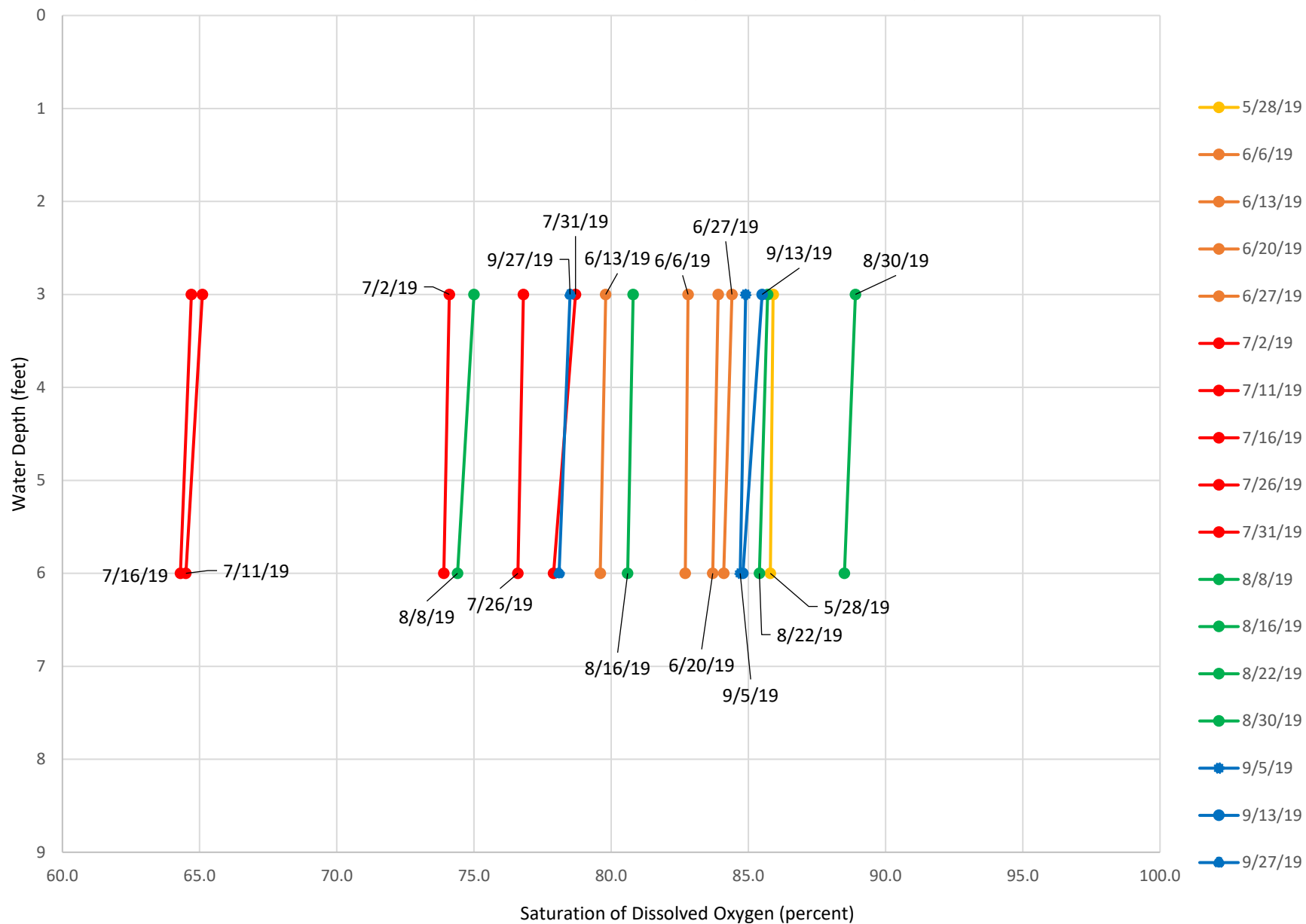
Dissolved Oxygen Concentrations at Site 3 Monitoring Location



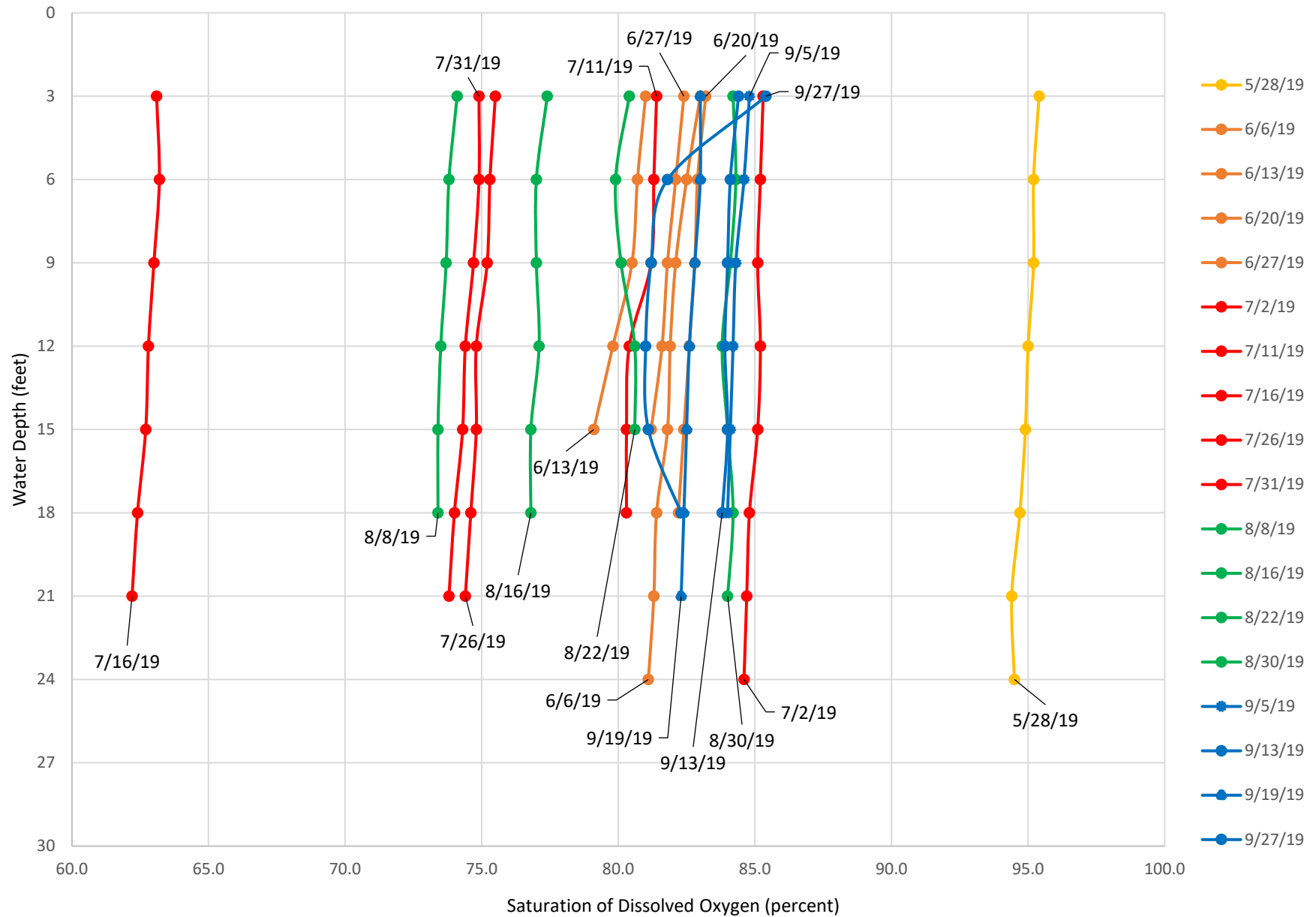
Average Dissolved Oxygen Concentrations



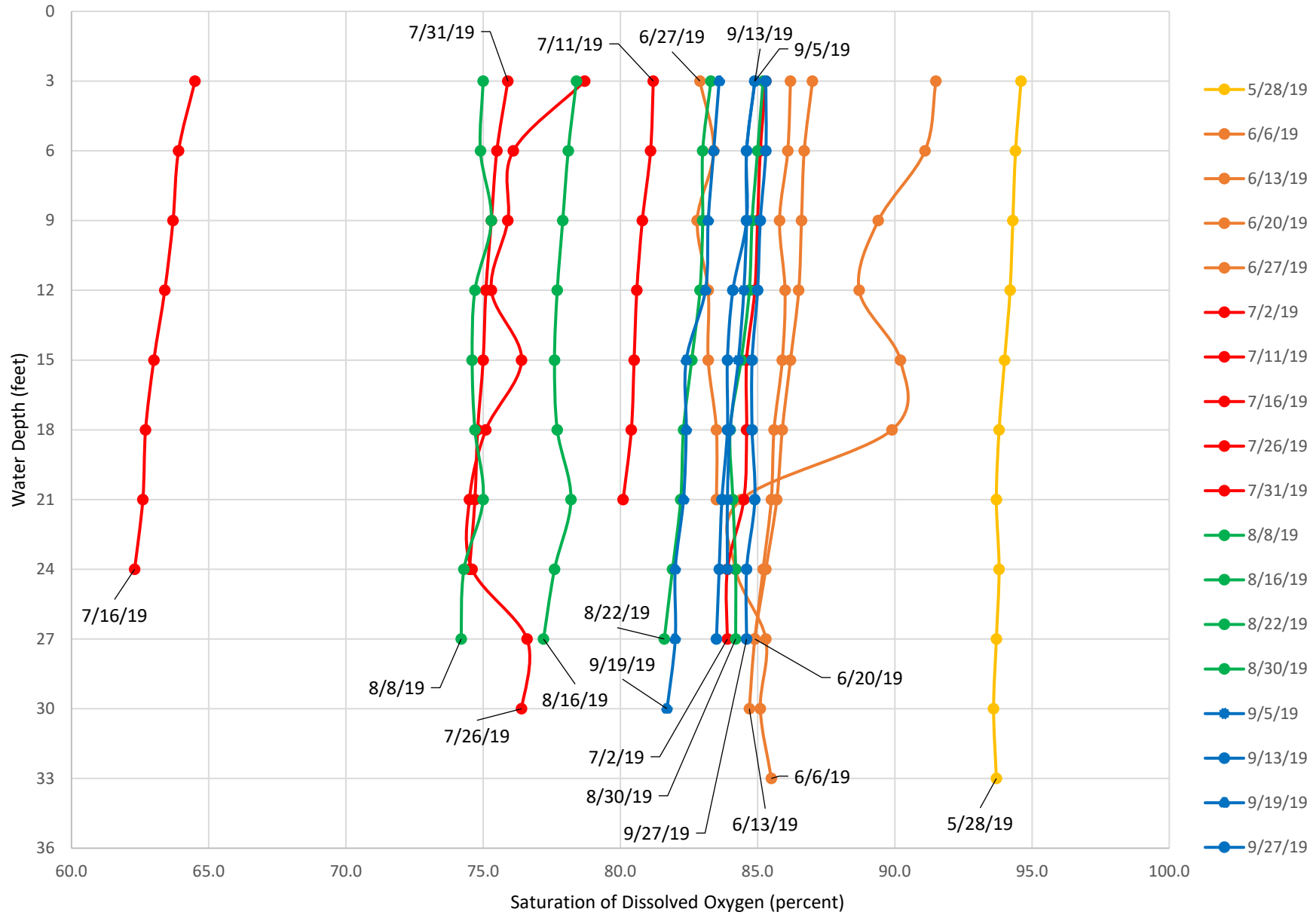
Dissolved Oxygen vs. Depth at Upstream Monitoring Location



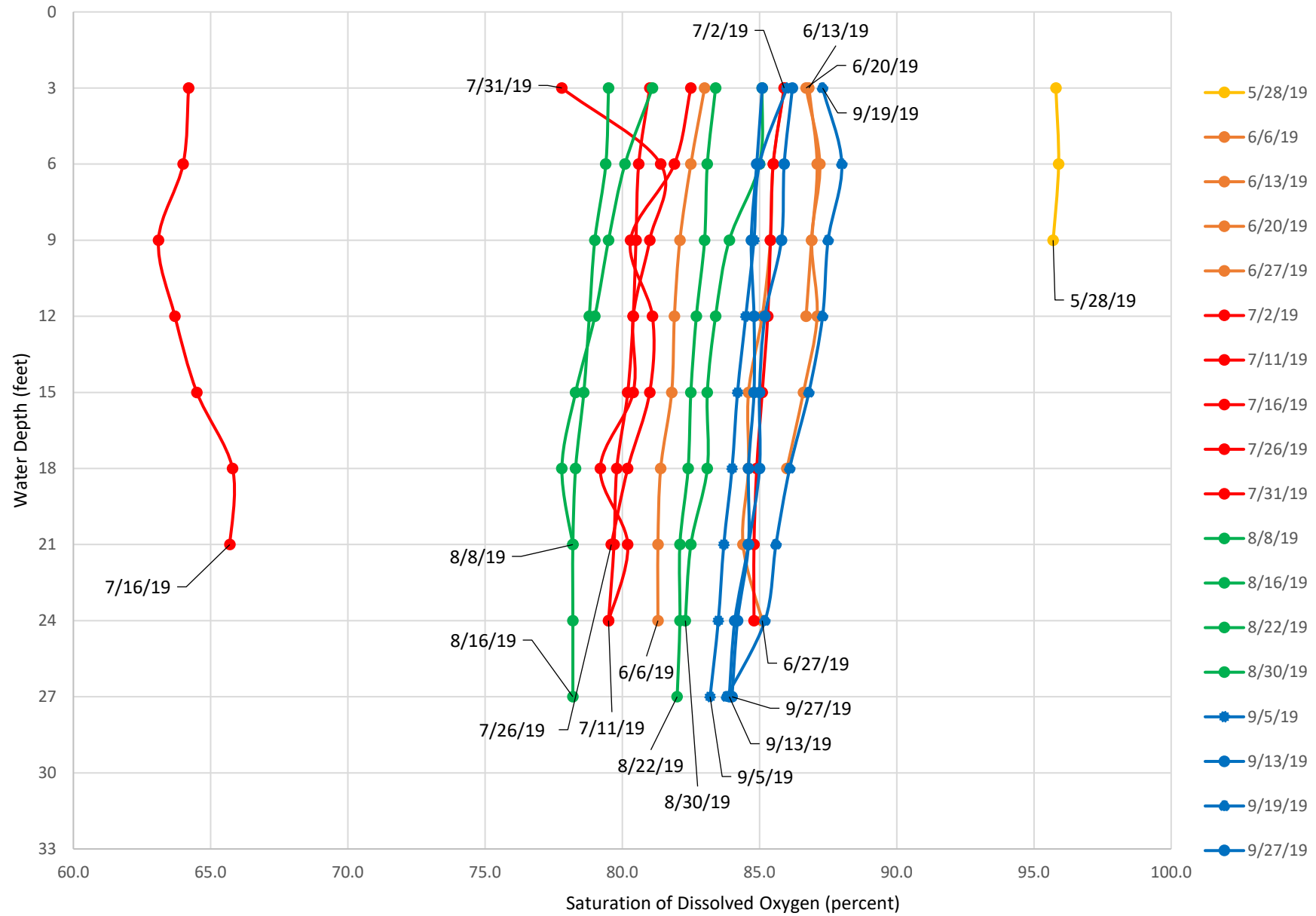
Dissolved Oxygen vs. Depth at Site 1 Monitoring Location



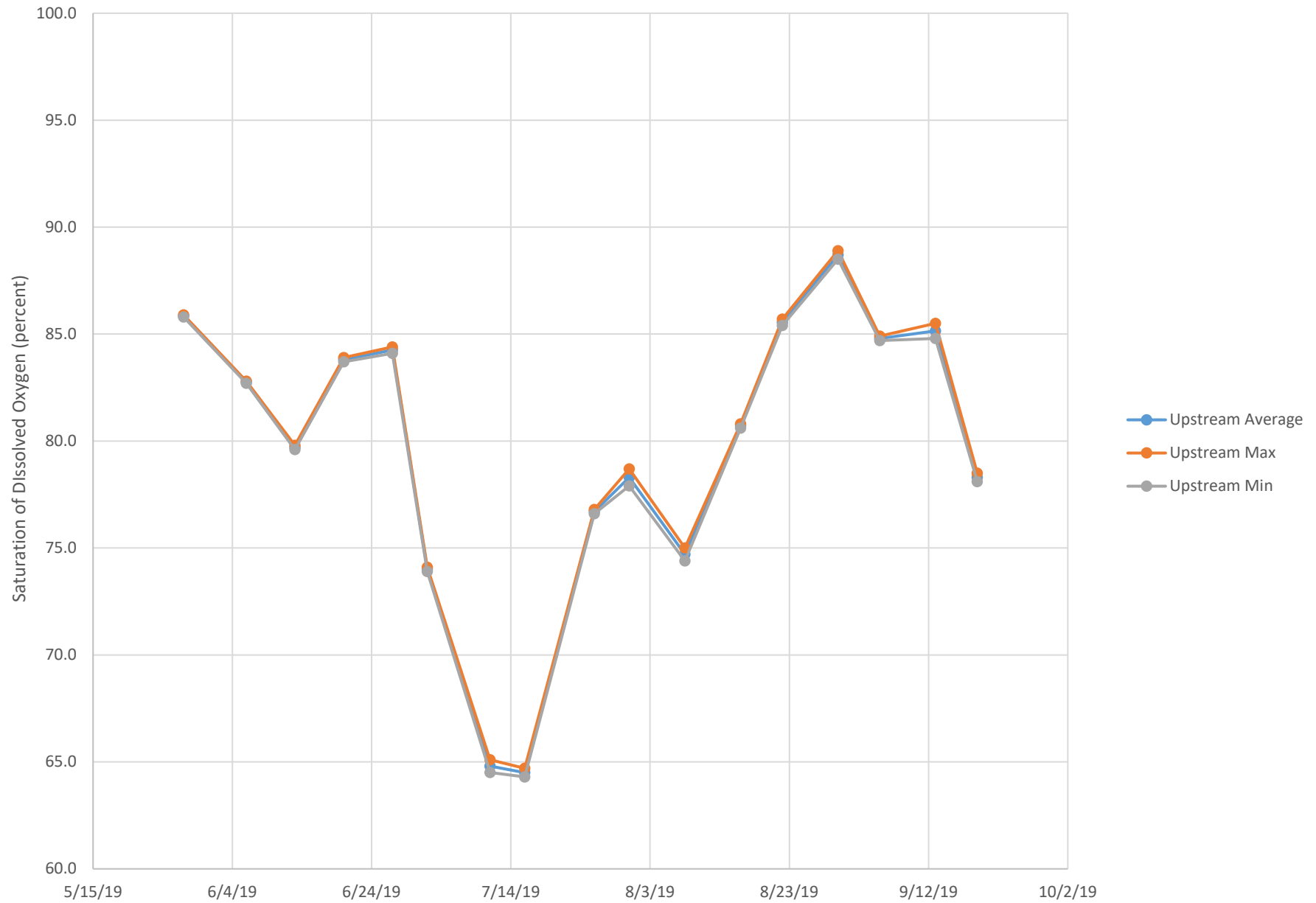
Dissolved Oxygen vs. Depth at Site 2 Monitoring Location



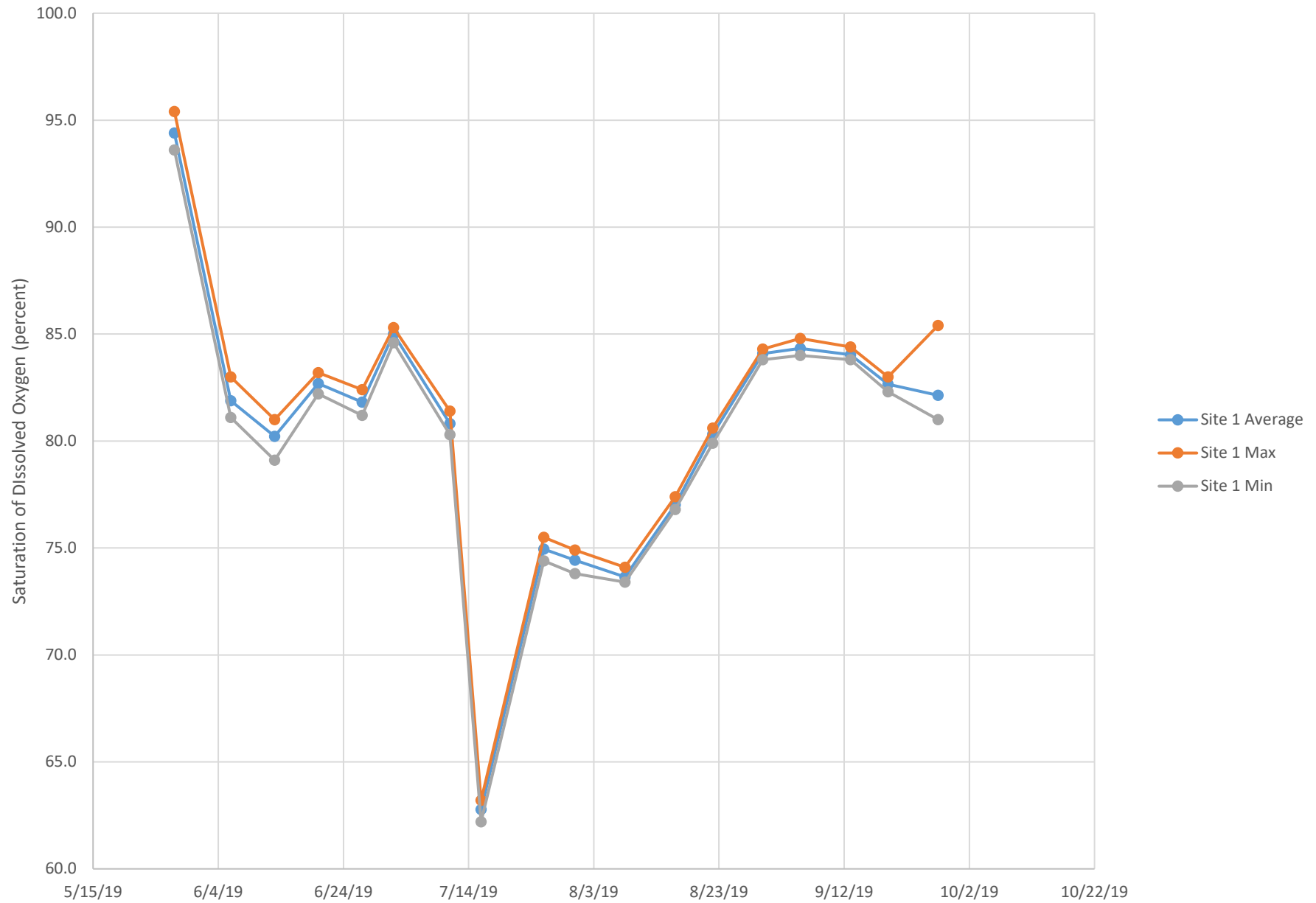
Dissolved Oxygen vs. Depth at Site 3 Monitoring Location



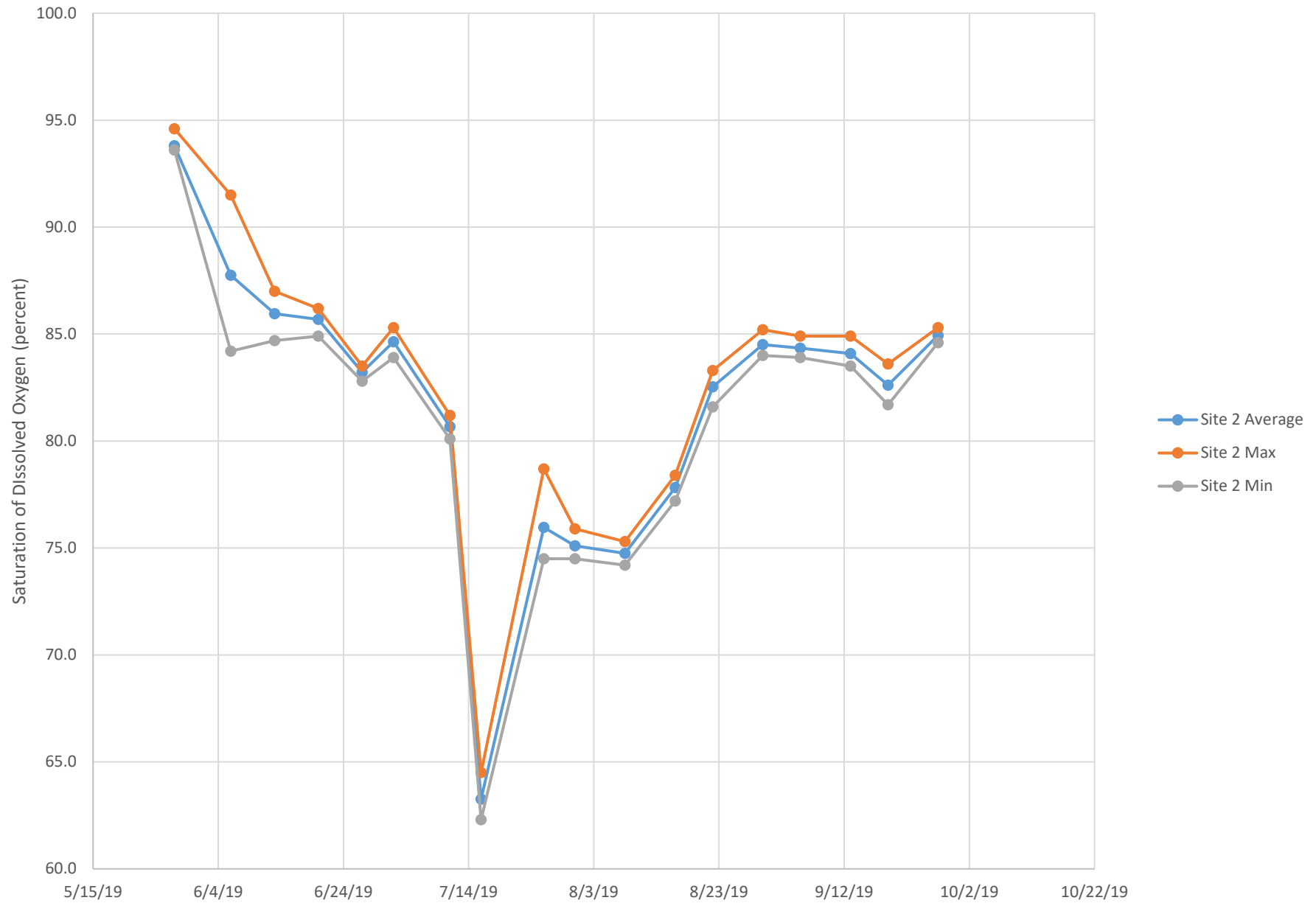
Percent Dissolved Oxygen at Upstream Monitoring Location



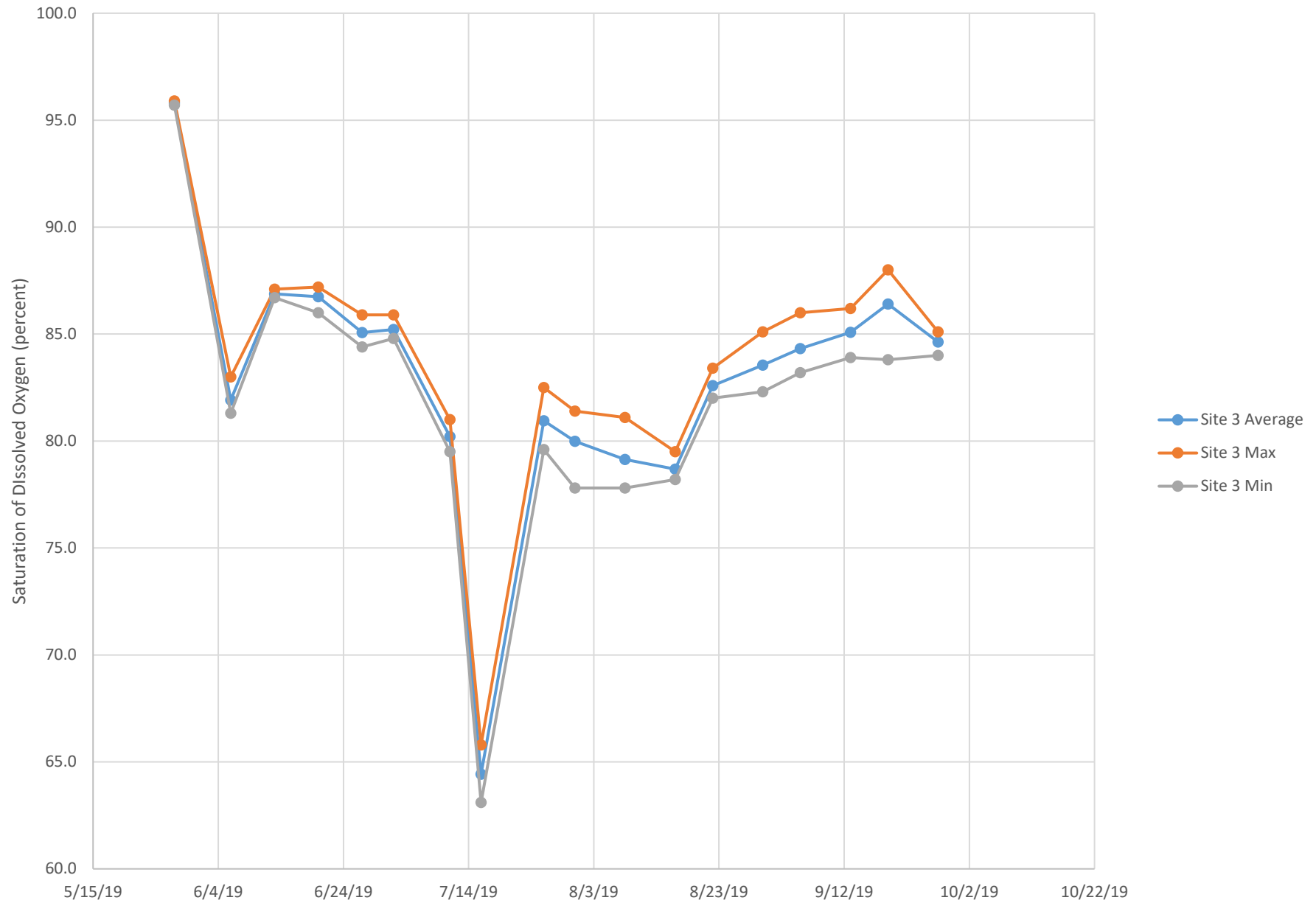
Percent Dissolved Oxygen at Site 1 Monitoring Location



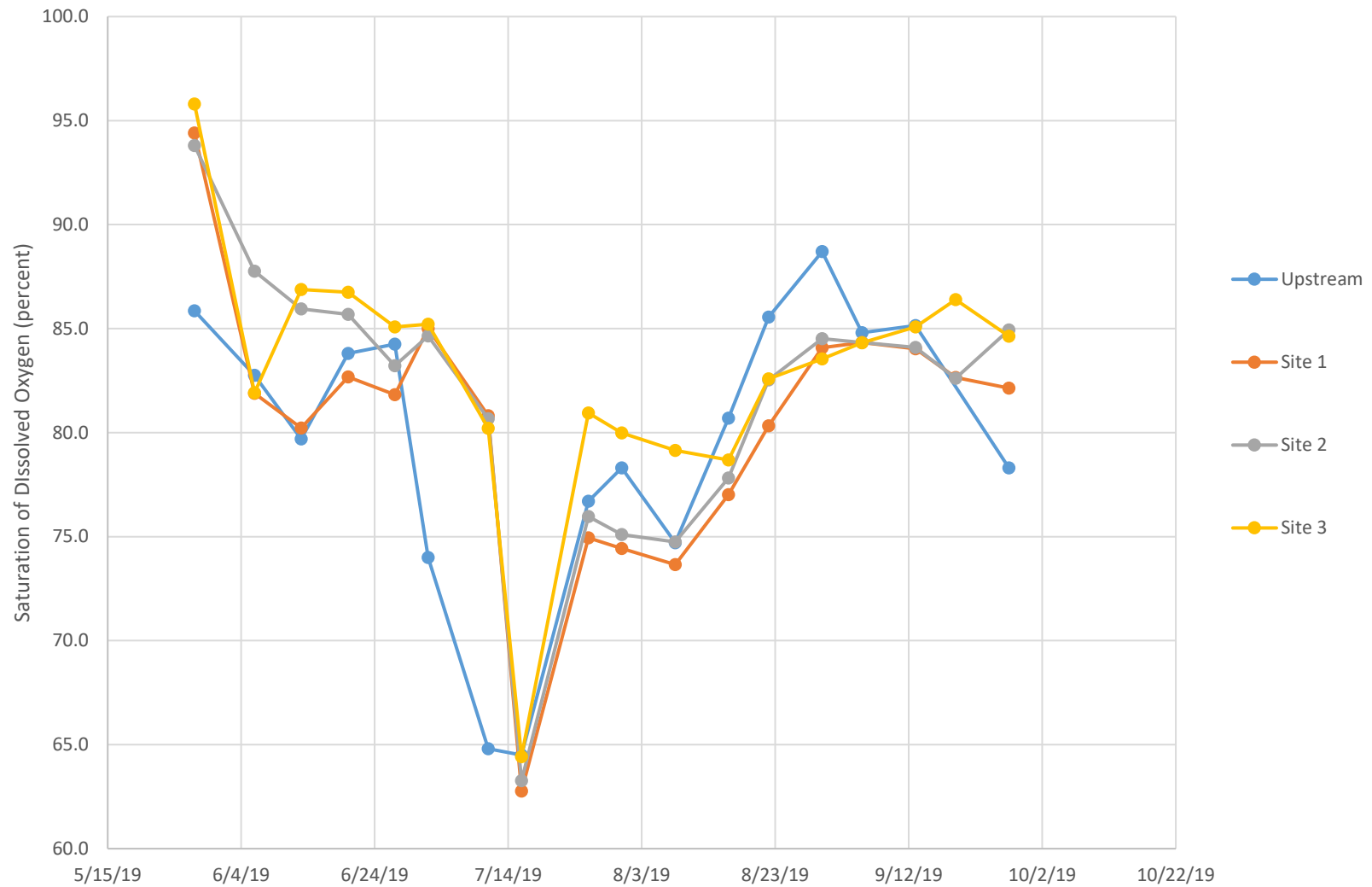
Percent Dissolved Oxygen at Site 2 Monitoring Location



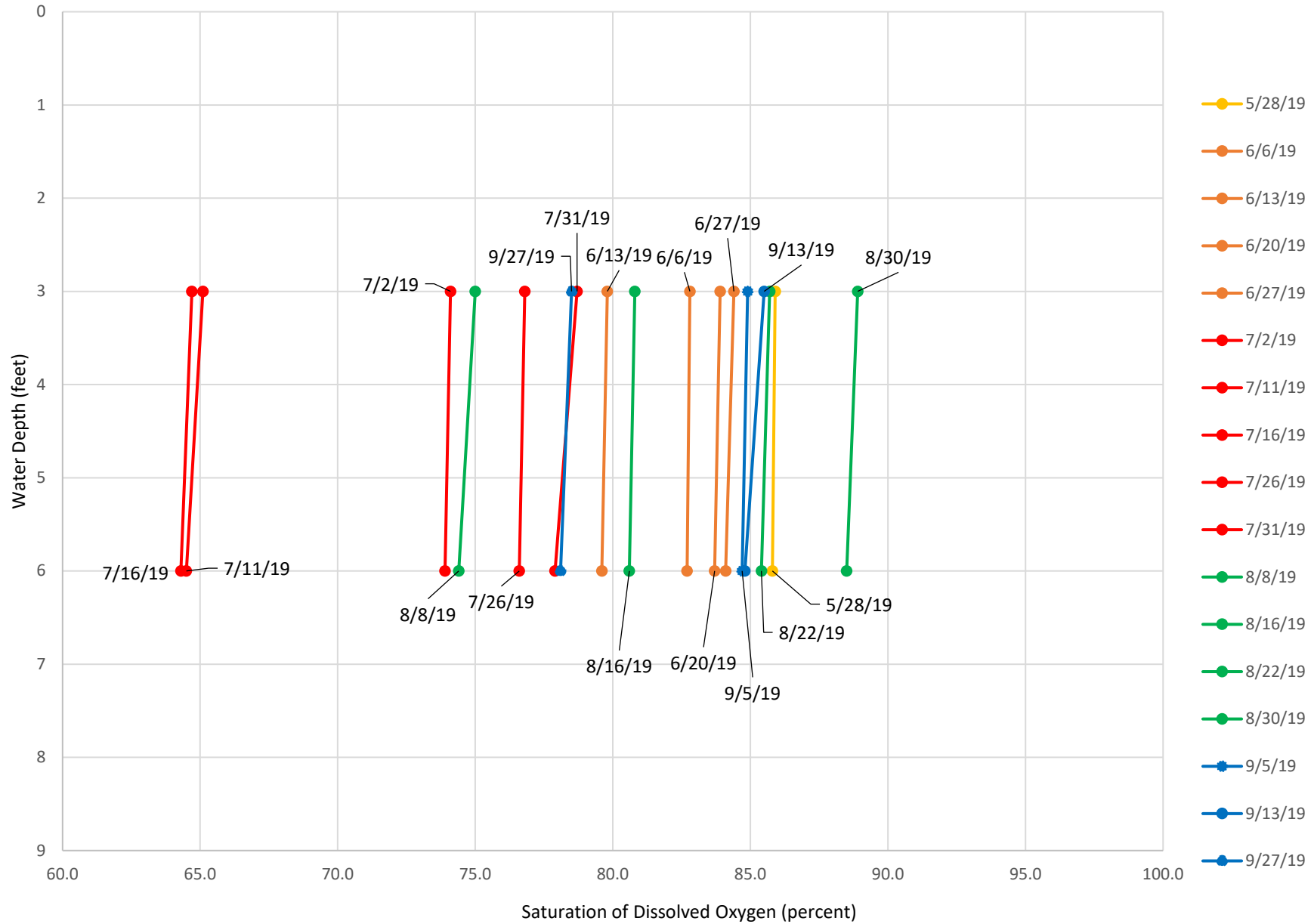
Percent Dissolved Oxygen at Site 3 Monitoring Location



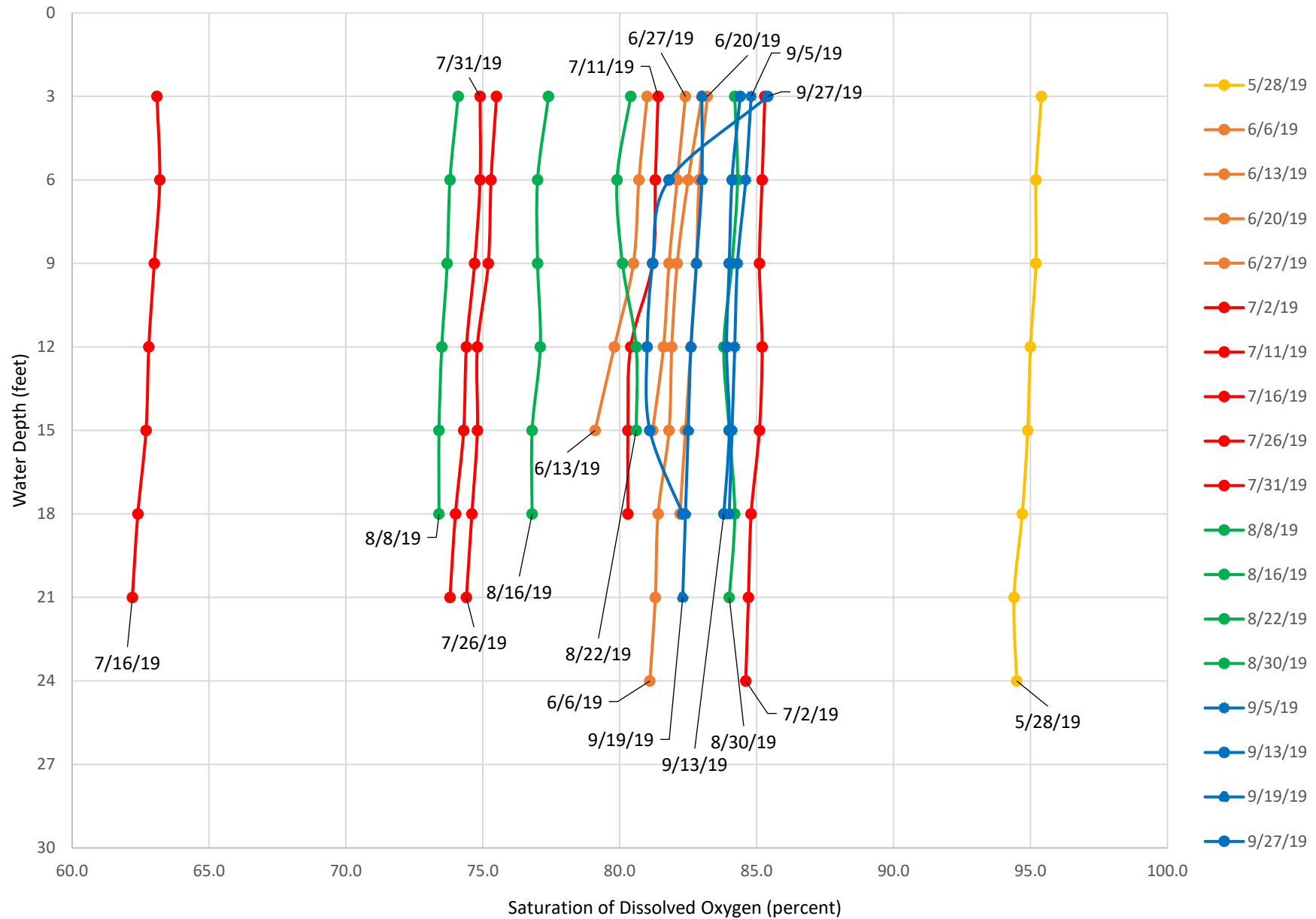
Average Percent Dissolved Oxygen



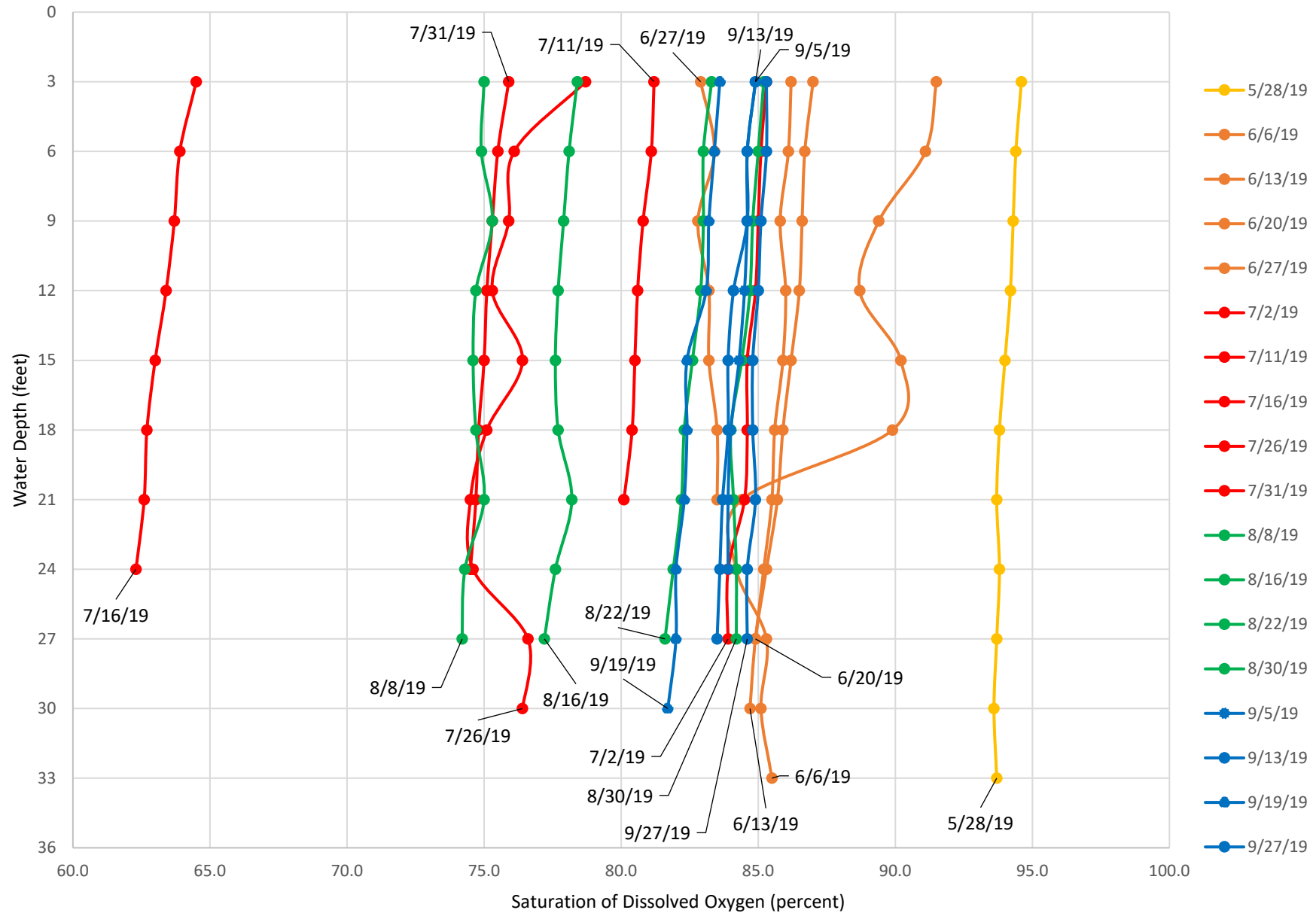
Saturation of Dissolved Oxygen vs. Depth at Upstream Monitoring Location



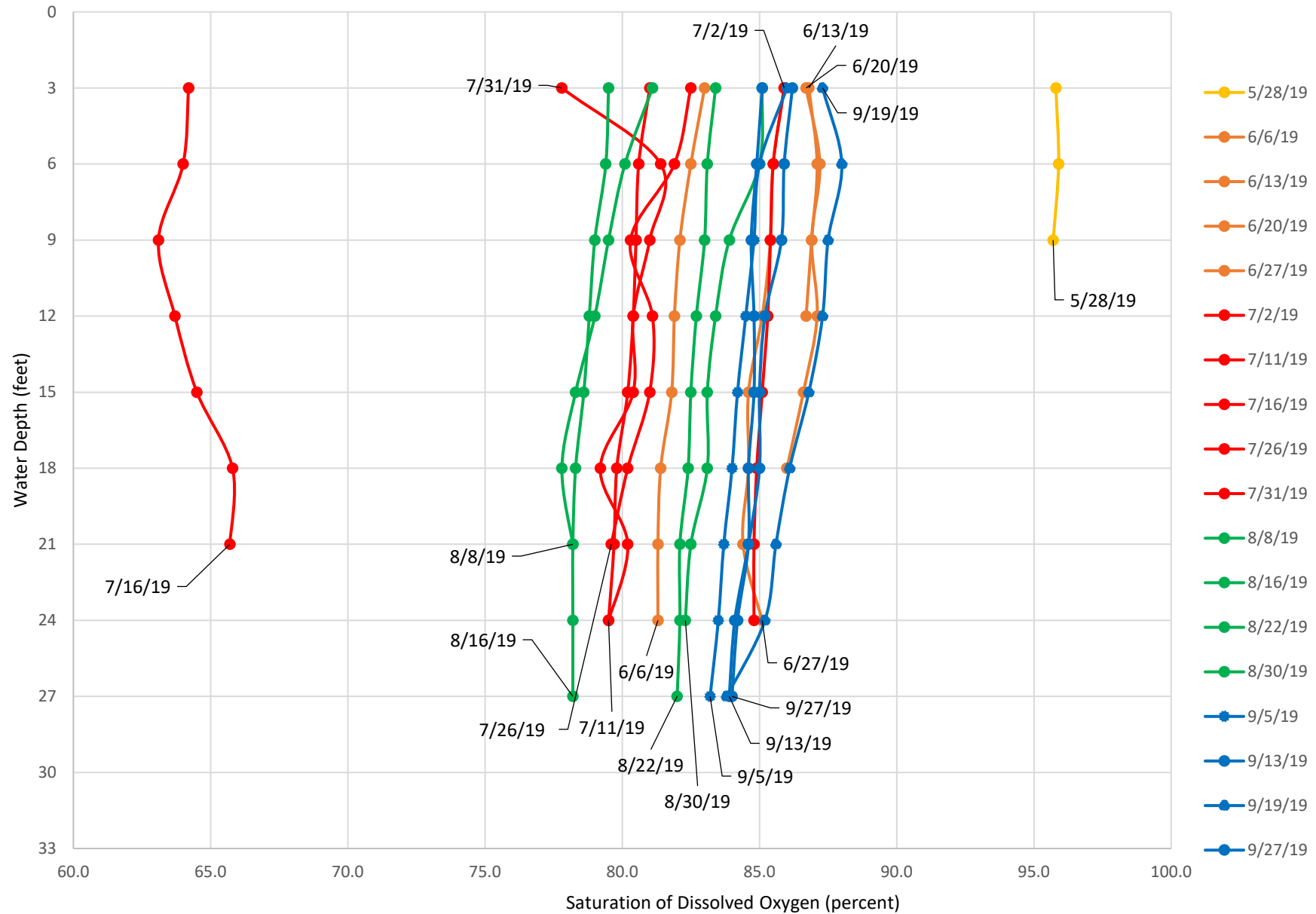
Saturation of Dissolved Oxygen vs. Depth at Site 1 Monitoring Location



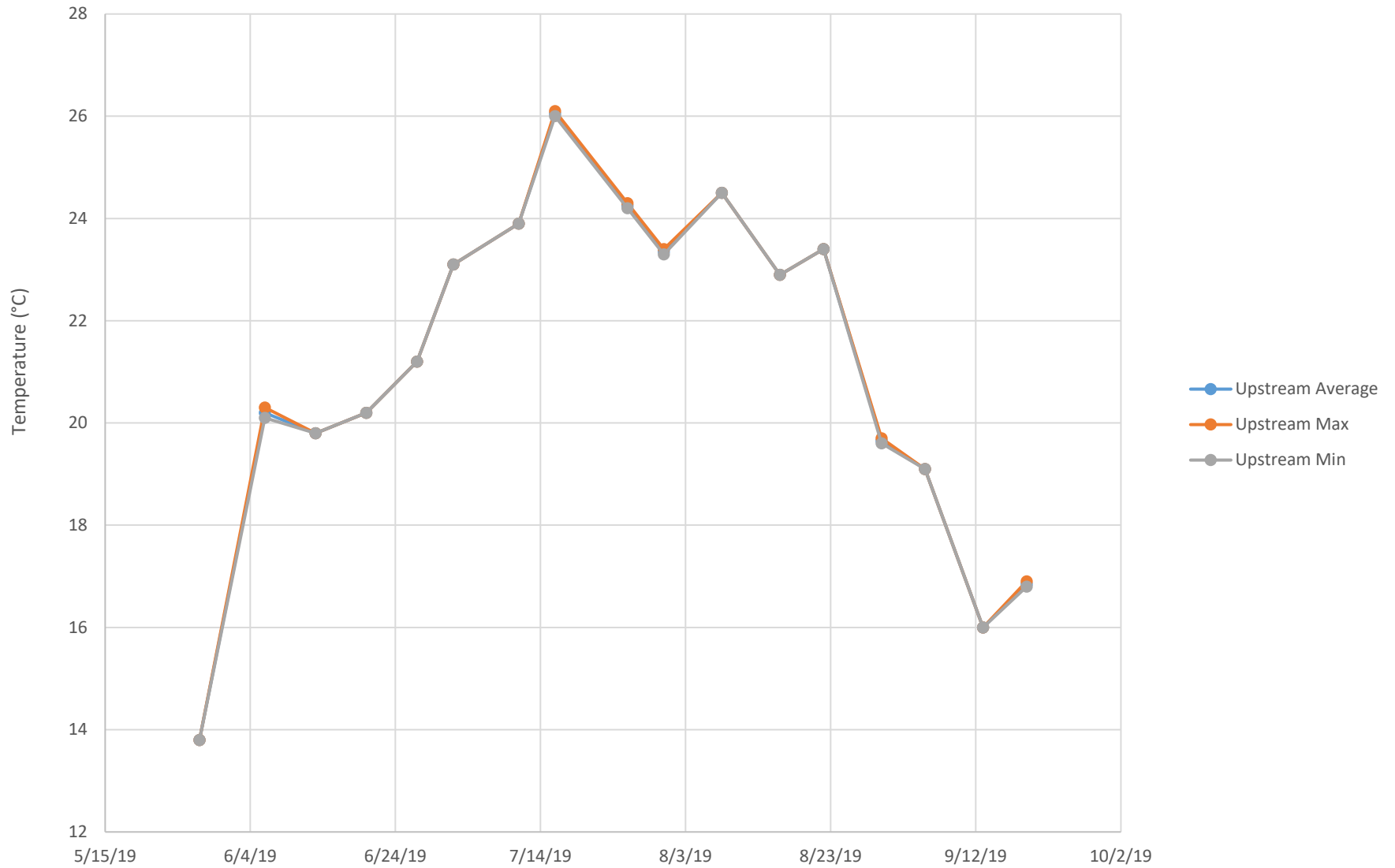
Saturation of Dissolved Oxygen vs. Depth at Site 2 Monitoring Location



Saturation of Dissolved Oxygen vs. Depth at Site 3 Monitoring Location



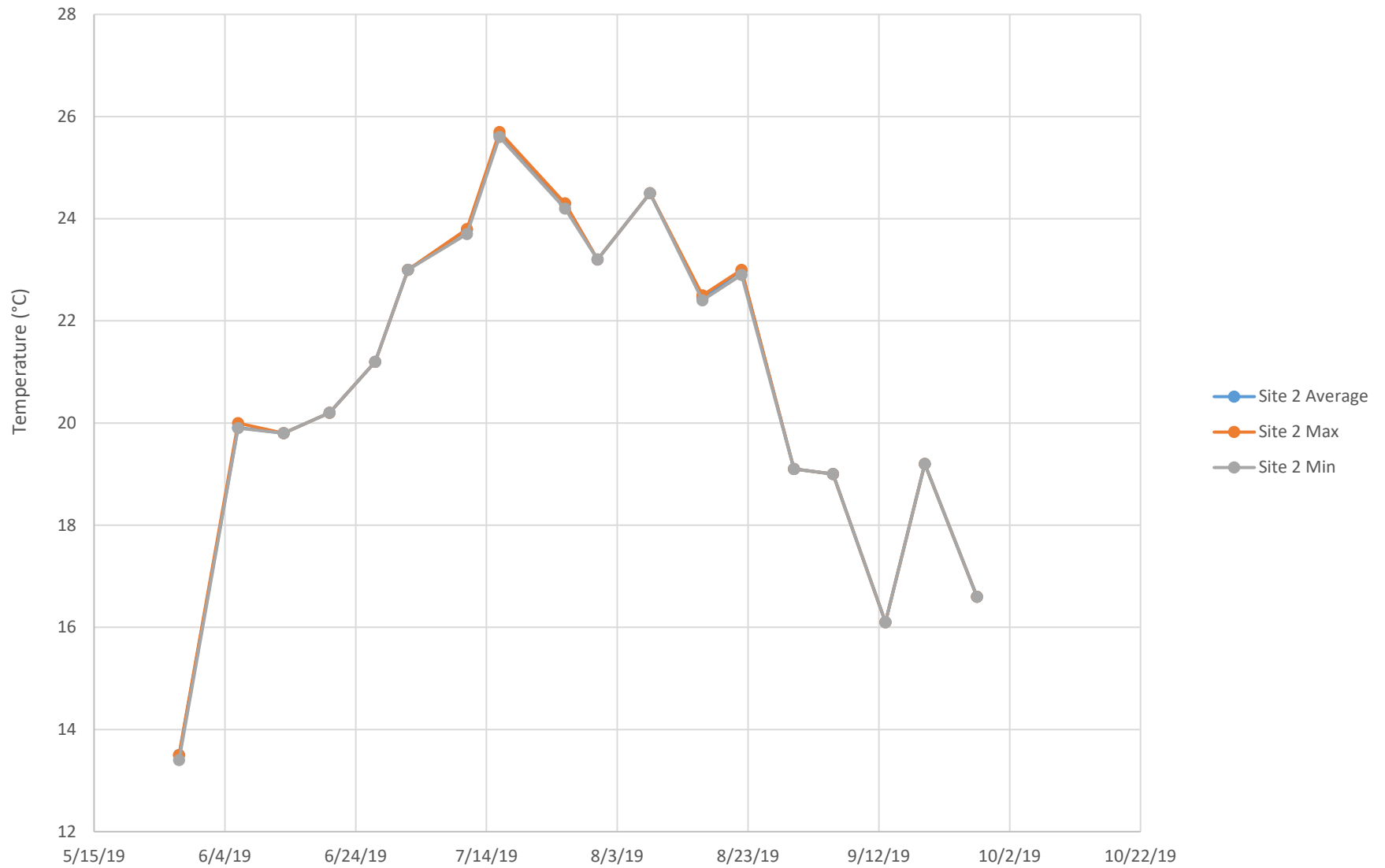
Temperature at Upstream Monitoring Location



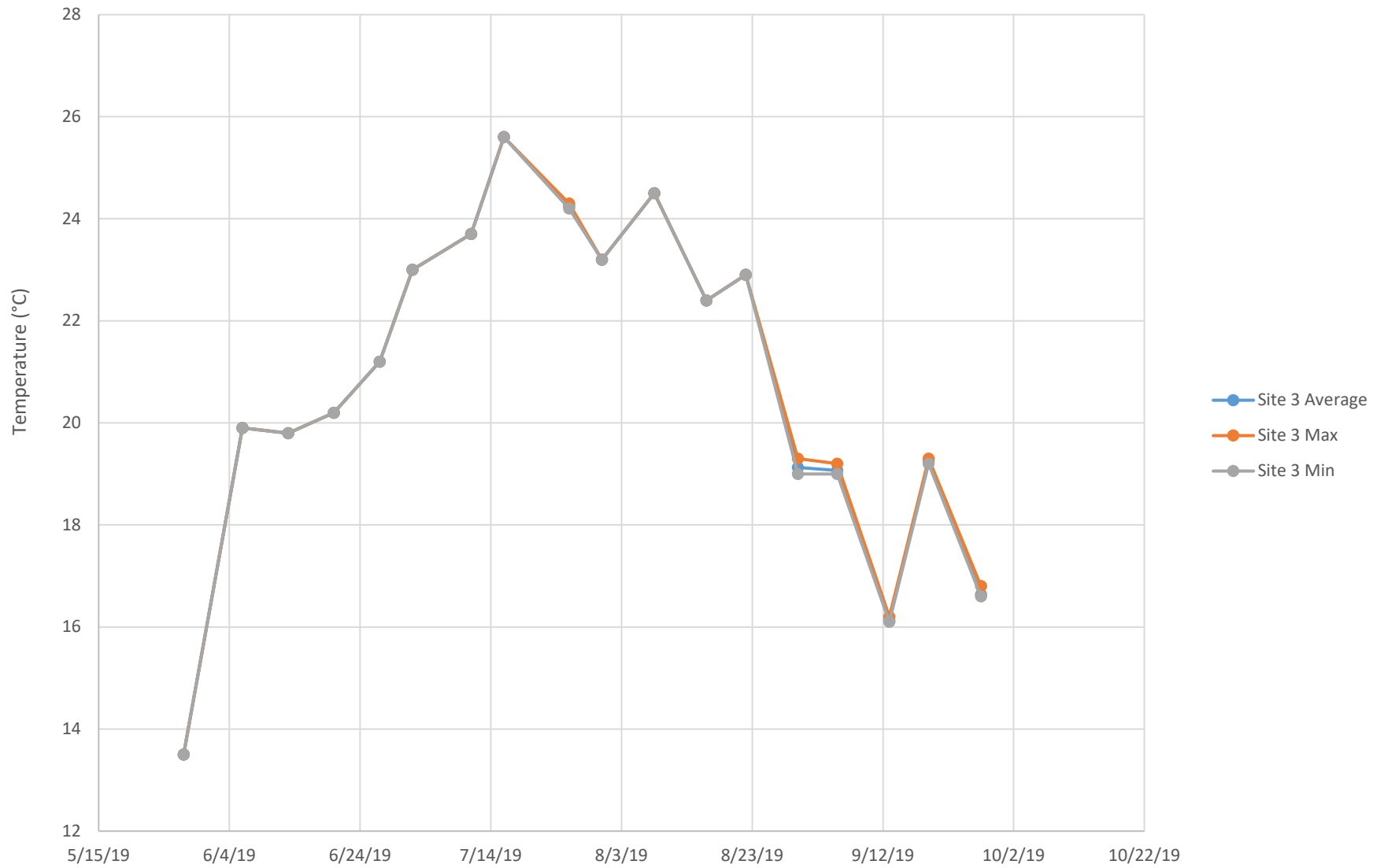
Temperature at Site 1 Monitoring Location



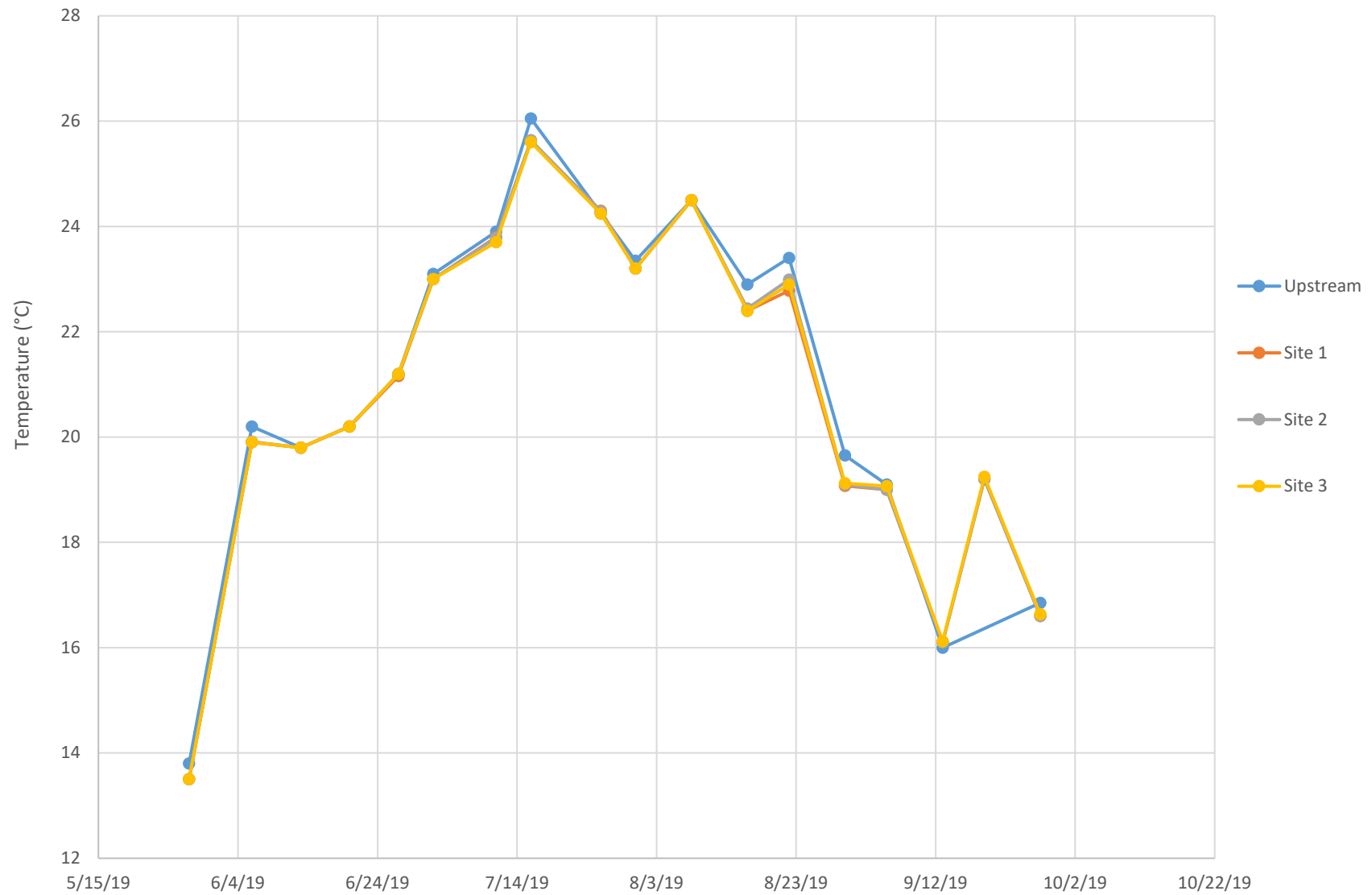
Temperature at Site 2 Monitoring Location



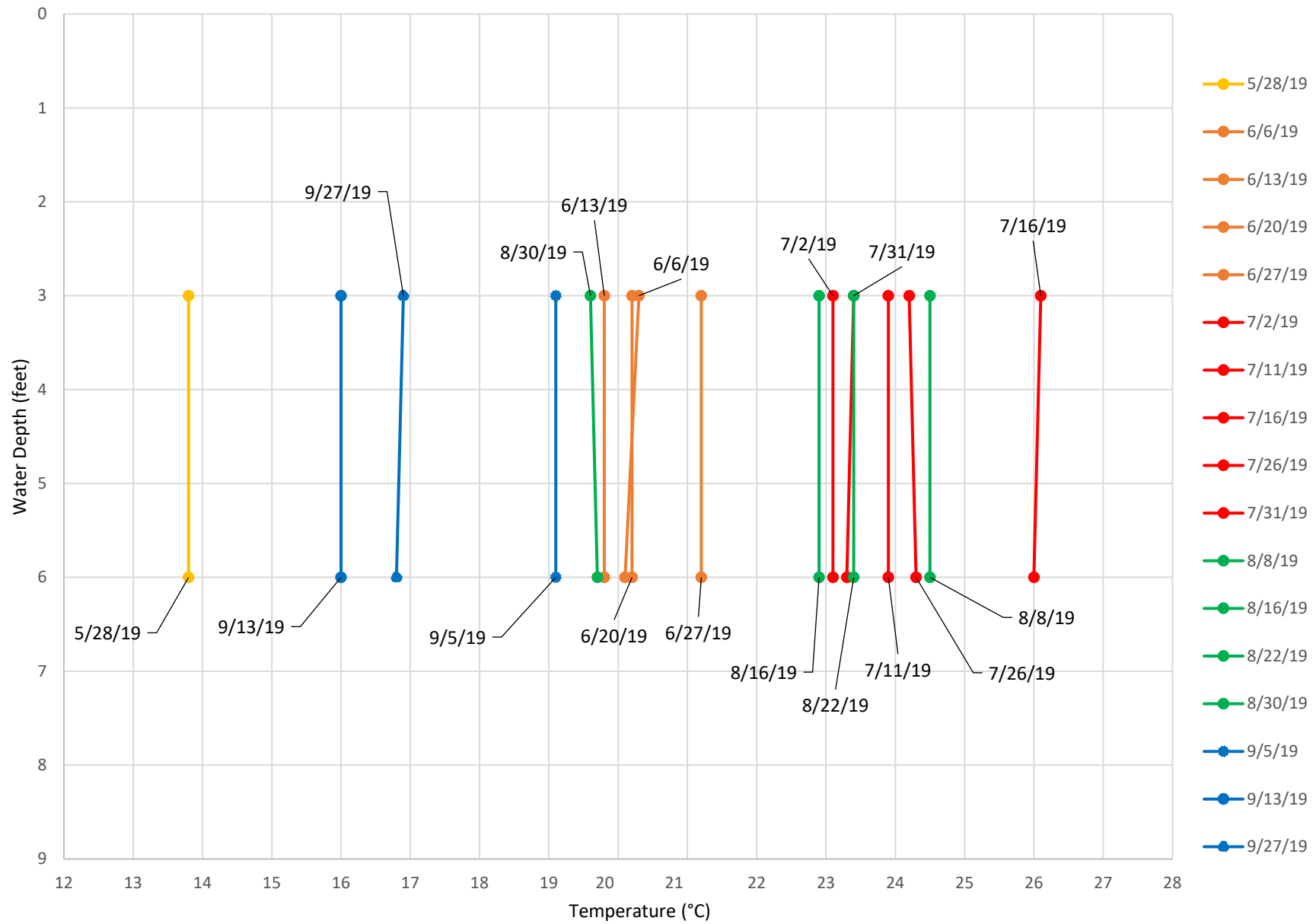
Temperature at Site 3 Monitoring Location



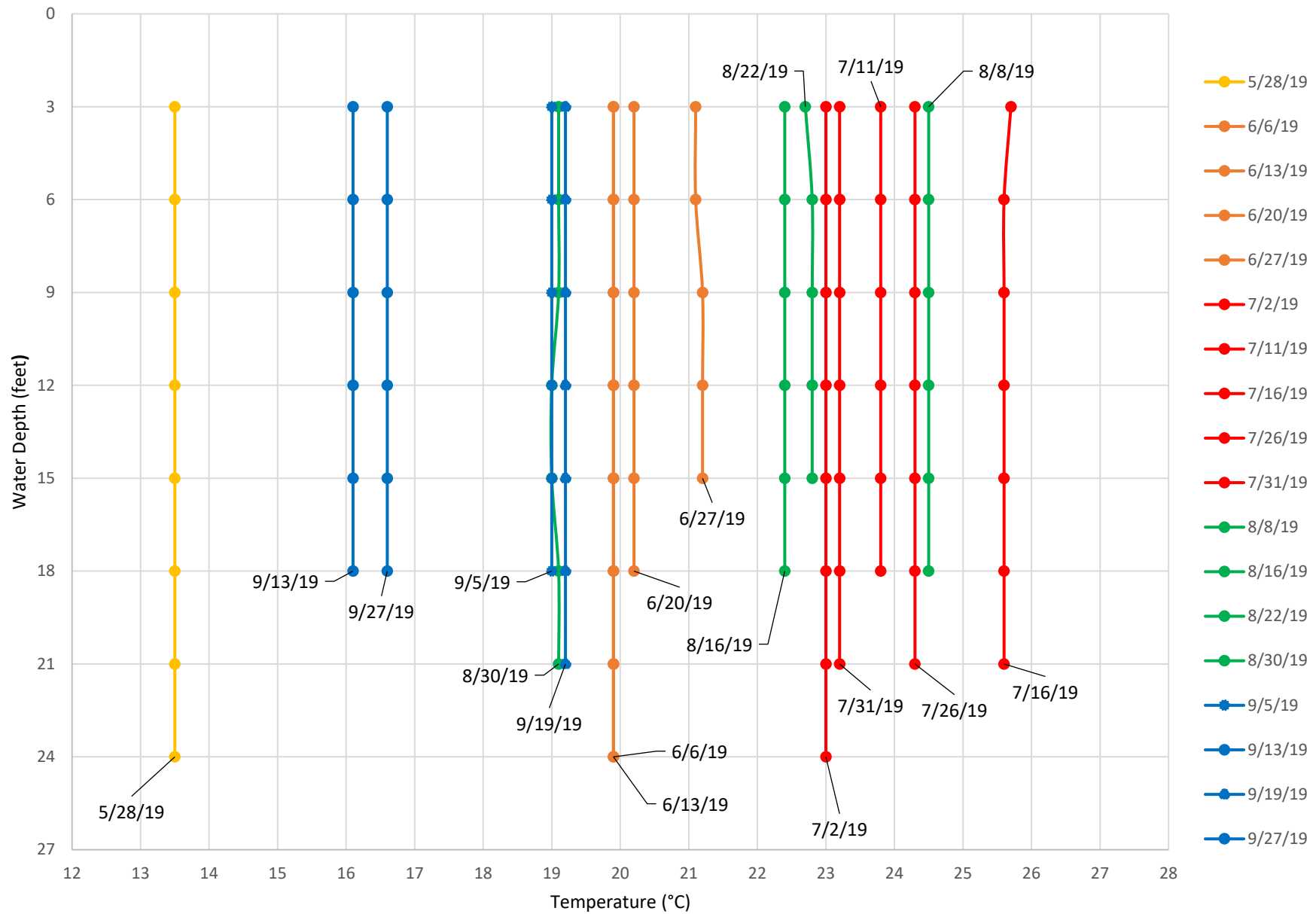
Average Temperature



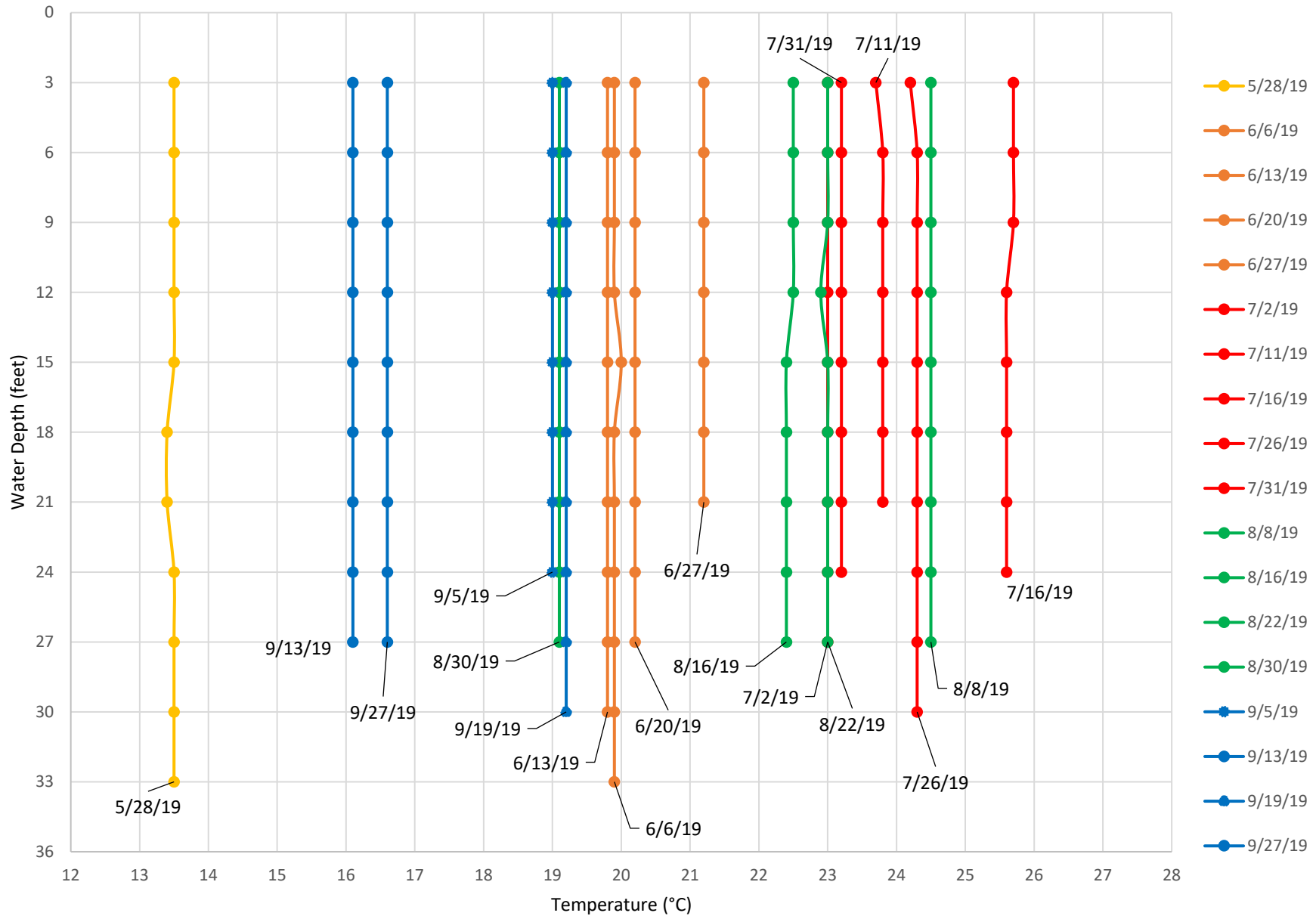
Temperature vs. Depth at Upstream Monitoring Location



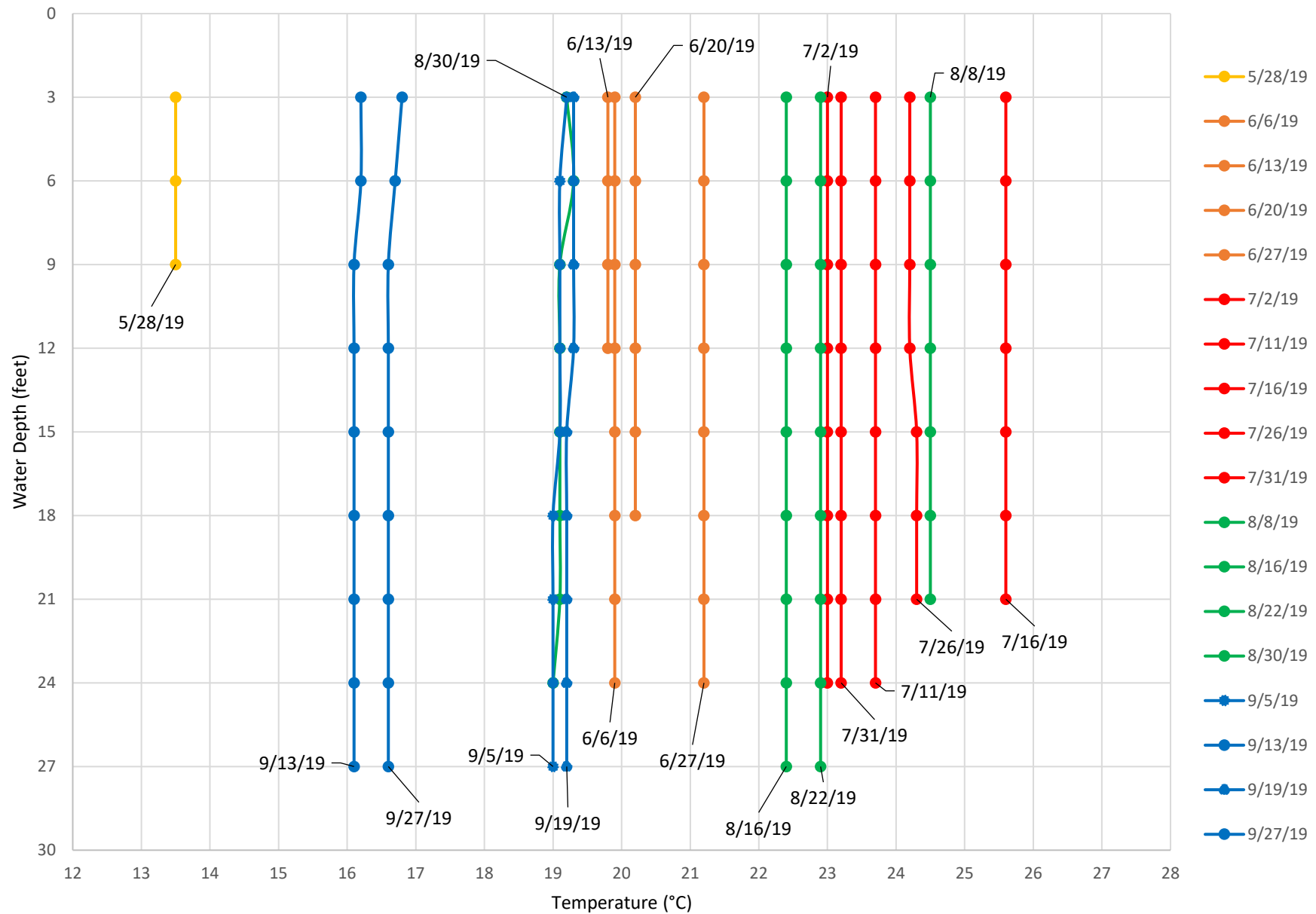
Temperature vs. Depth at Site 1 Monitoring Location



Temperature vs. Depth at Site 2 Monitoring Location



Temperature vs. Depth at Site 3 Monitoring Location



Appendix D

Site Photographs



Photograph 1: Facing upstream toward BPU facility, with bascule gates visible on the left and the powerhouse visible on the right. Foam on water surface is caused by naturally-occurring tannins in the water (July 11, 2019).



Photograph 2: Facing upstream toward BPU facility, including tainter gate (on left) and bascule gates (on right). Water is currently flowing over both bascule gates (July 16, 2019).



Photograph 3: Facing upstream toward BPU facility powerhouse at time of water sampling. Photograph taken from sampling location "Site 1" (August 8, 2019).



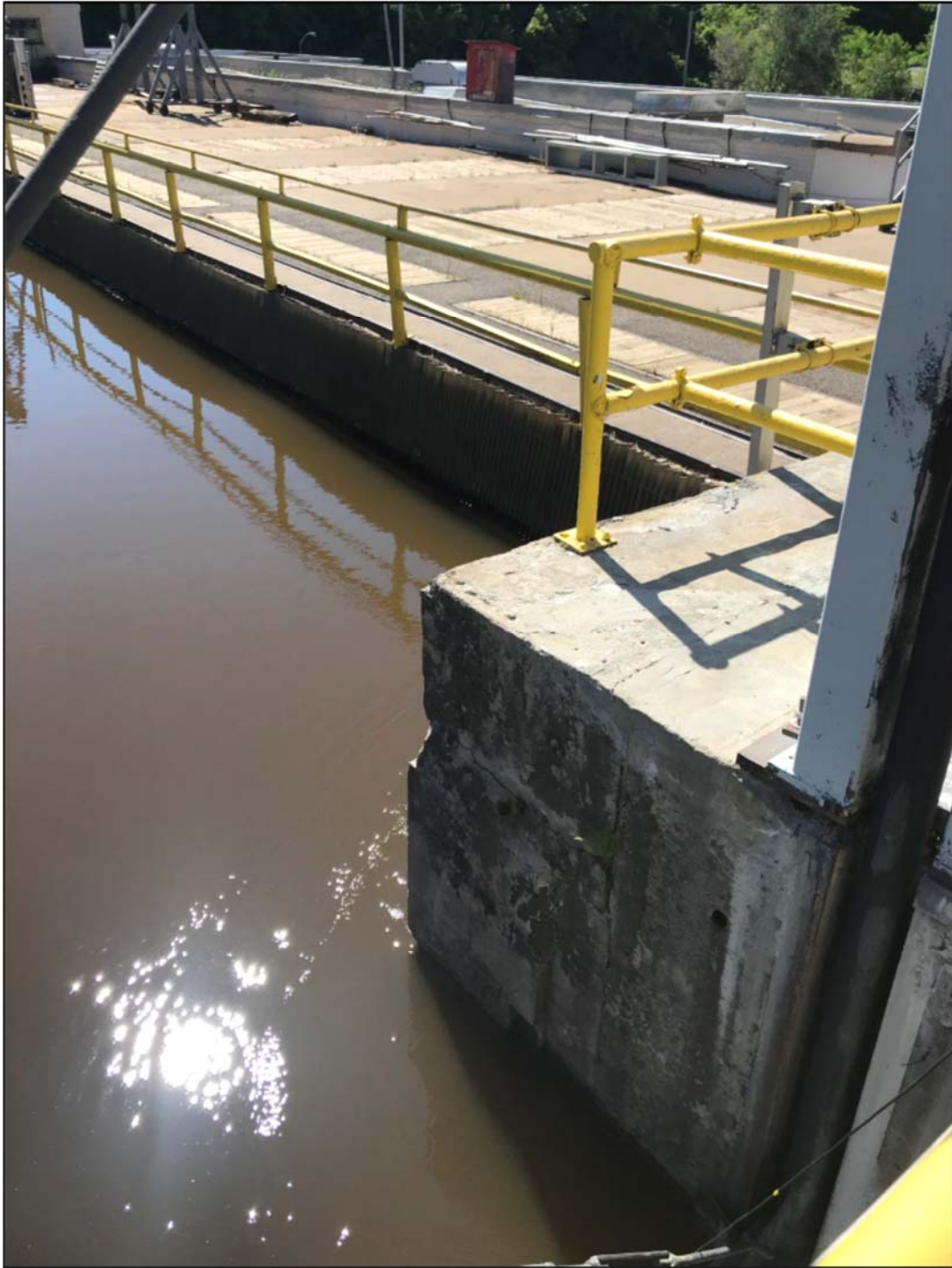
Photograph 4: Facing upstream (north) from west side of BPU powerhouse, towards reservoir. Photograph taken from "Upstream" sampling location (July 11, 2019).



Photograph 5: Facing downstream (south) from west side of BPU powerhouse (July 11, 2019).



Photograph 6: Facing east bank of Mississippi River, from "Site 3" downstream sampling location (June 20 11, 2019).

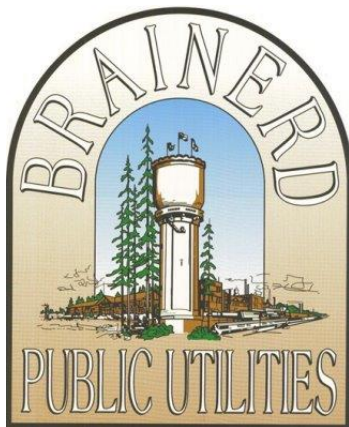


Photograph 7: Facing southeast from "Upstream" sampling location at intersection of powerhouse and slide gates (June 13, 2019).

Fish Impingement and Entrainment Study

Brainerd Hydroelectric Project *FERC License No. 2533*

Prepared for:
Brainerd Public Utilities
Brainerd, Minnesota



January 22, 2020

Available for Public Release

Fish Impingement and Entrainment Study Brainerd Hydroelectric Project

January 22, 2020

Preface

Brainerd Public Utilities (BPU) began the renewal process for the Federal Energy Regulatory Commission (FERC) license of the Brainerd Hydroelectric Project (FERC Project No. 2533) (Project). As part of the relicensing process a fish entrainment and impingement and turbine mortality was requested by FERC. A desktop analysis of fish entrainment and impingement was conducted using data available from field studies conducted at various hydroelectric facilities across the United States. The Electric Power Research Institute (EPRI) has developed a database of hydro turbine fish entrainment and survival studies that will be a key resource in developing a proper desktop analysis for the Project.

This desktop assessment approach relies on results of published turbine entrainment and passage survival studies and site-specific project and turbine design specifications to estimate entrainment rates and fish passage survival. The potential for fish impingement on the intake trashracks was evaluated qualitatively using publicly available information about fish morphology and swimming speeds, trashrack spacing, and calculated approach velocities at intake areas. Estimates derived from this desktop study are expected to be suitable for determining general potential for levels of entrainment and impingement that may occur as a result of the Project operations; the findings should not be considered absolute quantitative results.

Impingement is the potential for fish to become trapped against the inner intake trashracks due to high velocity conditions at the powerhouse intake. Entrainment is the passage of fish into the powerhouse intakes and passed through the turbine units. Alden Research Laboratory, Inc. (Alden) conducted the work for Sections 4.44 - 4.6 and 5.2 - 5.5.

Fish Impingement and Entrainment Study Brainerd Hydroelectric Project

January 22, 2020

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Abbreviations and Acronyms

BPU	Brainerd Public Utilities (Licensee)
CFR	Code of Federal Regulations
cfs	cubic feet per second
EPRI	Electric Power Research Institute
FERC	Federal Energy Regulatory Commission
FPA	Federal Power Act
ft/s	feet per second
MNDNR	Minnesota Department of Natural Resources
MPCA	Minnesota Pollution Control Agency
Project	Brainerd Hydroelectric Project
RC%	relative percent composition
RSP	Revised Study Plan

Definitions

Project	Brainerd Hydroelectric Project, Federal Energy Regulatory Commission (FERC) No. 2533 (Project)
Project Area	The area within the Project boundary consisting of "...lands necessary for the operation and maintenance of the Project and for other Project purposes..." (1)
Project boundary	The boundary line defined in the Project license issued by the FERC that surrounds the "...lands necessary for the operation and maintenance of the Project and for other Project purposes..." (1)
Relicensing	The process of acquiring a new FERC license for an existing hydropower project under expiration of the existing FERC license

1.0 Introduction

1.1 Background

Brainerd Public Utilities (BPU) has begun renewing the Federal Energy Regulatory Commission (FERC) license of the Brainerd Hydroelectric Project FERC Project No. 2533 (Project). As part of the relicensing process, an assessment of fish entrainment and impingement and turbine mortality was requested by FERC, as defined in the Revised Study Plan (RSP) (2). A desktop analysis of entrainment and impingement was conducted using data available from field studies conducted at various hydroelectric facilities across the United States. The Electric Power Research Institute (EPRI) has developed a database of hydro turbine fish entrainment and survival studies (3) that was used as a resource in developing the desktop analysis for the Project.

1.2 Turbine Entrainment, Impingement, and Mortality

Entrainment is the passage of fish into the powerhouse intakes and through the turbine units as water is passed through the powerhouse. Impingement occurs when fish become trapped against the inner intake trashracks due to high velocity conditions at the powerhouse intake. Most entrained or impinged fish are in the early life stages (typically of lengths less than 8 inches) that are incapable of avoidance or unable to safely swim away from the intake of the turbines. Entrainment and mortality rates can vary depending on river flow, sizes of fish, seasonal differences, species of fish, fish swimming ability, and turbine design and configurations (4); FERC 1997. Mortality of fish passing through turbines can be caused by shear stress, mechanical injuries (grinding, blade strike), and pressure changes.

1.3 Fish Community

The Brainerd area provides premier fish habitat. In addition to the Mississippi River, immediately upstream of Rice Lake, an impoundment of the Mississippi River partially created by the Project, provides important fisheries habitat near the Project. As such, it contains both typical lake and riverine fish species (5).

The Minnesota Department of Natural Resources (MNDNR) surveyed the Rice Lake fishery in August 2014 and sampled 17 fish species, including black crappie, bluegill, bowfin (dogfish), brown bullhead, channel catfish, greater redhorse, hybrid sunfish, largemouth bass, northern pike, pumpkinseed, rock bass, shorthead redhorse, silver redhorse, smallmouth bass, walleye, yellow bullhead, and yellow perch (5). Although no muskellunge were sampled during the survey, there are reports of this fish species being caught in both Rice Lake and the adjoining reach of the Mississippi River, as the MNDNR stocks this species in the Mississippi River. The MNDNR also stocks walleye in this region. Smallmouth bass is the primary management species of fish in Rice Lake, while walleye, northern pike, and muskellunge are secondary management species (5).

2.0 Project Location, Facilities, and Operation

This section provides a description of the Project and operation.

2.1 Licensee

The Project is owned and operated by the city of Brainerd and its Public Utilities Commission under a license from the FERC as Project No. 2533.

2.2 Project Location

The Project is located in Crow Wing County on the Mississippi River near the northeast side of Brainerd, Minnesota, as shown in Figure 2-1. The Project is located approximately 130 miles north of the Minneapolis – St. Paul metropolitan area.

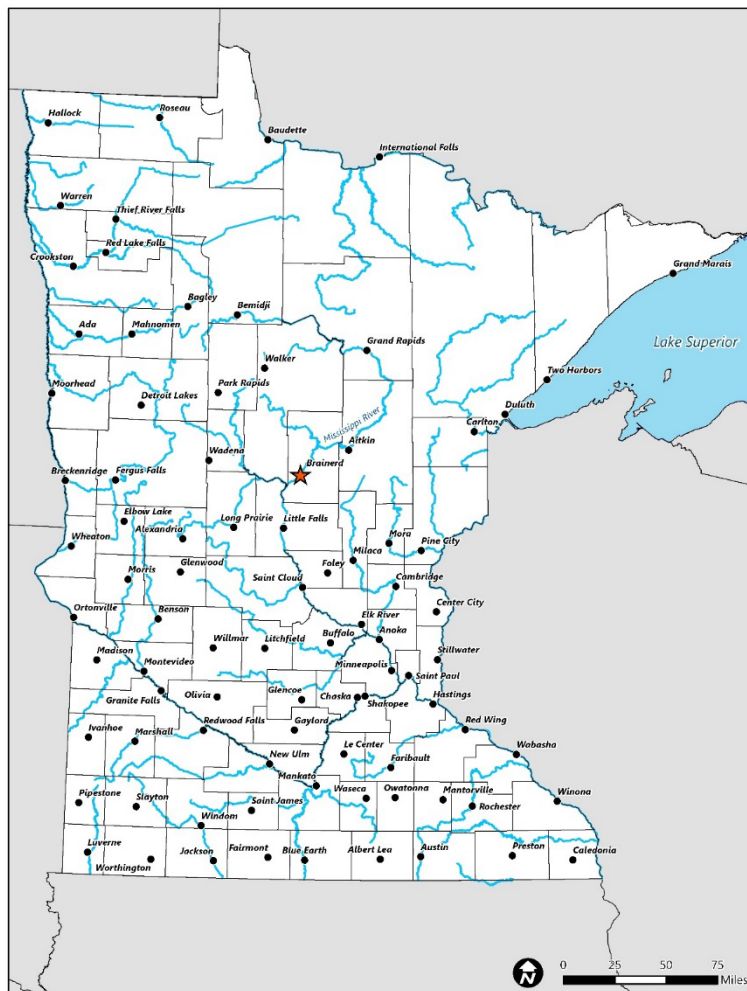


Figure 2-1 Project Location

2.3 Project Overview

From the left bank of the Mississippi River (looking downstream), the Project consists of a short left embankment, a 256-foot-long powerhouse, a 78-foot-long slide gate section, a 207-foot-long bascule (crest) gate section, a single 20-foot-wide steel tainter gate, and a 200-foot-long right embankment, as shown in Figure 2-2. The Project is located on land owned by BPU and is a run-of-river hydroelectric project with an authorized installed capacity of 3,542.5 kW.

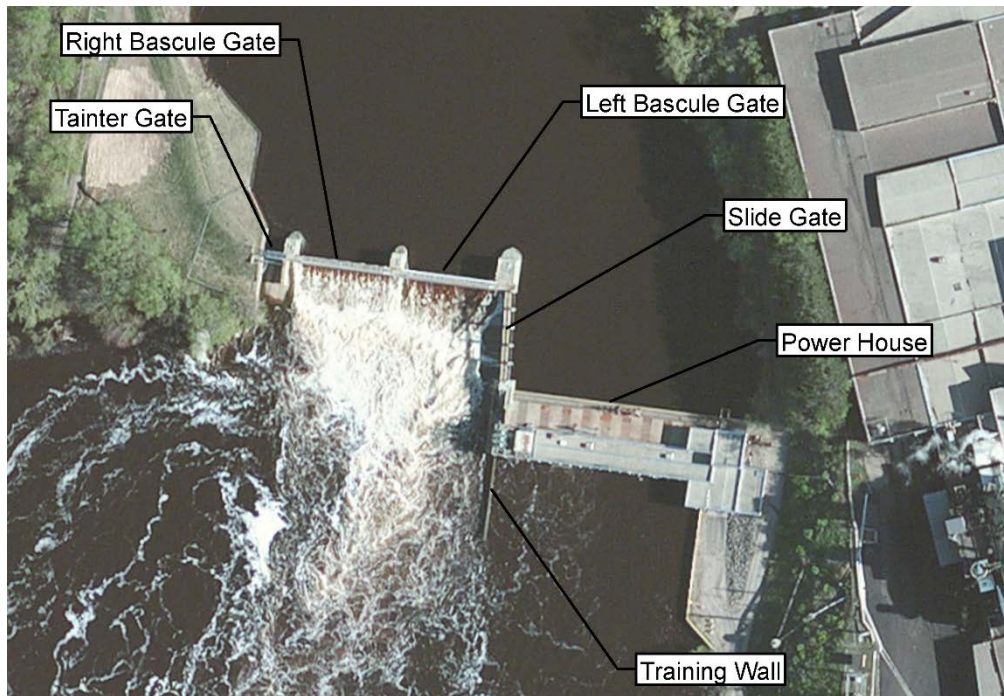


Figure 2-2 Project Overview

2.4 Study Boundary

This fish impingement and entrainment study boundary included the powerhouse and infrastructure (such as intakes, trashracks, and turbines) impacting the fish community in the upstream reservoir.

3.0 Study Goals and Objectives

3.1 Goals and Objectives

The goal of this study is to evaluate the potential for fish entrainment and impingement at the Project and its potential effects on the health of the Upper Mississippi River fishery. The objectives of this study are to:

- Describe the physical characteristics of the intake structures, including the location, dimensions, and the velocity distribution in front of each structure;
- Analyze fish species for factors that influence their vulnerability to impingement, entrainment, and turbine survival;
- Assess the potential for fish species impingement at the Project;
- Estimate entrainment rates and turbine-passage survival rates for fish species at the Project; and
- Describe the likely effects of Project-induced entrainment or impingement on fish resources, based on the physical characteristics of the Project.

3.2 Public Interest Considerations

Sections 4(e) and 10(a) of the Federal Power Act (FPA) require that FERC give equal consideration to all uses of the waterway on which a project is located. In making its license decision, FERC must equally consider the environmental, recreational, fish and wildlife, and other non-developmental values of the Project, as well as power and developmental values.

Fish populations in the Project Boundary support a sport fishery. As such, the effects that operating the Project may have on fisheries resources are relevant to FERC's public interest determination.

4.0 Methodology

4.1 Methodology Overview

The methodology for this analysis will follow standard methods and data sources previously accepted by FERC or standard methods used by fisheries management professionals for desktop evaluation of impingement, entrainment, and turbine mortality ((6), (4), (7)). Fish that are small enough to pass through the Project's trashracks will be considered susceptible to entrainment. Fish large enough to be physically excluded due to size (length, width/body depth) will be considered as potentially susceptible to impingement or entrainment because of individual species habitat use, behaviors, or swimming abilities.

Fish species and abundance information available from the MNDNR and the Minnesota Pollution Control Agency (MPCA) will be used to characterize the fisheries community composition upstream of the Project. Fish species will be grouped into family groups and size classes for evaluation. For species/family groups, where no comparable or applicable data can be found, the survival rate reported for a similar group/size class will be substituted. Fish species/groups for evaluation will be developed in conjunction with the MNDNR. Preliminary review of fisheries data indicates evaluation of walleye, smallmouth bass, largemouth bass, channel catfish, yellow perch, northern pike, bigmouth buffalo, white sucker, shorthead redhorse, and silver redhorse will be considered as potential target species/groups.

Fish entrainment data from other similar hydroelectric projects (head, turbine type, flow capacity, etc.) were selected from the databases available from the EPRI (3) to develop a project estimate using the Project-specific fish species/group assemblages. The evaluation will be sequenced with the following inputs:

1. Develop a matrix of entrainment studies that can be applied to the Project.
2. Calculate and estimate fish entrainment rates at the Project site based on available Project operation information. Estimate the maximum approach velocity at each turbine, based on the size of the intake area and the maximum hydraulic capacity at each turbine. Entrainment will be defined as the number of fish/volume of water entrained.
3. Utilize reservoir-specific species compositions in conjunction with applicable prior studies to characterize the composition of the fish community susceptible to impingement or entrainment.
4. Apply physical, biological, or reservoir factor filters that may impact susceptibility to impingement or entrainment at the Project.
5. Estimate turbine mortality rates of entrained fish using a blade strike probability and mortality model (8), (9), (10).
6. Estimate impingement potential for fish too large to pass through intake trashrack bar spacing.
7. Report estimates of entrainment and mortality on a monthly fish group/size and fish per volume of water passed through the Project turbines. Estimated monthly entrainment rates will be

reported based on the relative abundance of species according to existing fisheries data from the MNDNR.

4.2 Factors Affecting Impingement, Entrainment, and Survival

Site factors affecting impingement, entrainment, and survival include the layout and operating system of the turbines and dam. The turbines operate at different hydraulic capacities and therefore have differing intake velocities. This will impact cross-sectional velocities approaching the intake trashracks. These velocities were used to determine the likelihood of how various fish species become impinged and entrained. Turbine survival (i.e., blade strike probability and mortality) is determined by fish length, runner diameter and rotational speed, number of blades, and inflow angle and velocity. Table 4-1 includes design and operation specifications for the Project's two turbine designs.

Table 4-1 Summary of Turbine Design and Operation Parameters for the Project.

Design Parameter	Units 1 & 2	Units 3 - 5
Turbine Type	Francis (horizontal)	Francis (horizontal)
Flow Capacity (cfs)	665	493
Rotational Speed (rpm)	128.5	128.5
Blade Tip Speed (ft/s)	25.2	31.2
Number of Blades	16	16
Blade Spacing (ft)	0.7	0.5
Leading Edge Blade Thickness (in)	0.4	0.4
Runner Diameter (ft)	3.75	2.71
Hub Diameter (ft)	3.5	2.5
Radial/Axial Flow Velocity (ft/s)	11.7	14.2
Absolute Flow Velocity (ft/s)	15.7	20.9
Relative Velocity of Flow to Blade (ft/s)	18.76	21.23

4.3 Intake Velocities and Trashrack Exclusion

Project intake cross-sectional velocities were calculated based on the wetted surface areas of the intake trashracks at the powerhouse for each turbine. The powerhouse is a 256-foot long structure with flume intakes measuring approximately 16.0– 17.5 feet wide. The distance from normal water elevation to the concrete sill at the trashrack is approximately 16 feet. Trashracks are located in front of the intakes to minimize fish entrainment. Trashracks consist of 3 inch by ¼ inch bars spaced at 2 inches on center. Intake velocity was calculated as the product of the width and height of the trashracks. This was then used to calculate the maximum flow through the intake trashracks based upon the total maximum hydraulic capacity of each of the turbines. The final trashrack cross-sectional velocity was calculated by taking the total hydraulic capacity and dividing by the total wetted area of the trashracks (Table 4-2).

Trashrack exclusion assessment includes estimating fish lengths for the target fish species that would be excluded or impinged by the 1.75-inch trashrack clear spacing. These species would have swim burst speeds that could withstand intake velocities and avoid entrainment.

Table 4-2 Project Turbine Cross-Sectional Velocities and Trashrack Clear Spacing

Unit Number	Maximum Hydraulic Capacity (cfs)	Trashrack Surface Area (ft ²)	Cross Sectional Velocity at Maximum Hydraulic Capacity (ft/sec)	Trashrack Clear Spacing (in)
1 (Francis)	665	280	2.38	1.75
2 (Francis)	665	280	2.38	1.75
3 (Francis)	493	256	1.93	1.75
4 (Francis)	493	256	1.93	1.75
5 (Francis)	493	256	1.93	1.75

4.4 Impingement Assessment Methods

The risk of impingement is assessed by determining the size at which fish are physically excluded by the trashrack bar spacing and by comparing species and life stage swimming speeds to intake approach flow velocities. Proportional body measurements from Smith (11) were used to determine the ratio of body width to total length for each species, which was then used to estimate the length at which a particular species would be physically excluded by the 1.75 inch (44 mm) clear bar spacing of the trashrack. The maximum total length identified for each species from the literature (12) was then compared to the estimated length of exclusion to determine if a species may have individuals that could be susceptible to impingement (i.e., reach a length at which physical exclusion would occur). Critical swim speeds for fish large enough to be physically excluded from entrainment were compiled from the available scientific literature and used to determine if impingement could potentially occur.

4.5 Entrainment Assessment Methods

Entrainment rates were calculated using data from field studies that were compiled into a turbine entrainment database by EPRI (3). The information in the applicable studies provided by the EPRI were assembled and screened based on entrainment data that could potentially be used for this study. Studies were selected from the screened projects that were the most similar and applicable to the Project. Criteria used in this selection included:

- Trashrack clear spacing of 1.75 – 2.40 inches
- Impoundment volume of 620 – 6400 acre-ft
- Similar station general flow capacities (1288 – 2400 cfs)
- Similar station operation (run of river, peaking, etc.)

- Biological similarities to the fish species, assemblages, and water quality

Nine sites in the EPRI database were identified as having generating-flow capacities, trashrack spacing, and impoundment volume, similar to those of the Project. Enough data was reported for six of the sites to calculate monthly and annual entrainment numbers at the Project by species and size (<200 mm and 200 to 380 mm in length) (Table 4-3). A 380-mm fish length was selected as a conservative estimate of the size at which fish will no longer fit through the 1.75-inch bar spacing of the intake trashracks.

The entrainment data (reported as fish entrained per million cubic feet of generation flow) from the selected sites were averaged by month for each species and size group. The average monthly entrainment rates were multiplied by the estimated average monthly generation flow (million cubic feet) at the Project to estimate the number of fish entrained monthly and annually (i.e., sum of monthly estimates).

Table 4-3 Site Characteristics for the Project and Other Similar Projects in the EPRI Entrainment Database

Site Name	Reservoir Area (acres)	Reservoir Volume (acre-ft)	Total Plant Capacity (cfs)	Operating Mode	Trashrack Spacing (in)
BPU Project	2500	13000	2800	ROR	1.75
Caldron Falls	1180	NR	1300	Peak	2.00
Colton	195	620	1503	Peak	2.00
Johnsonville	450	6430	1288	Peak	2.00
Potato Rapids	288	NR	1380	ROR	1.75
Sandstone Rapids	150	NR	1300	Peak	1.75
Schaghticoke	164	1150	1640	ROR	2.13

Note(s): NR indicates data were not reported for a given site and parameter.

ROR = Run of River

4.5.1 Fish Species Composition

Fish collection data from the MNDNR Fish Mapping Application (13) were used to compile a list of species and relative percent composition (RC %) occurring in the upper portion of the mainstem Mississippi River (Table 4-4). Common shiner (14.1 percent), yellow perch (13.5 percent), bluegill (12.0 percent), and spotfin shiner (10.1 percent) represent the largest percentage of species collected in the Upper Mississippi River.

The RC % values were calculated based on catches of species at sampling sites from Grand Rapids hydroelectric plant to the Project, including sampling from Rice Lake from 1999 to present. This list of species provides a comprehensive assessment of the fish community impacted and species potentially vulnerable for entrainment.

Table 4-4 Fish Species of the Upper Mainstem Mississippi River from the Project to Grand Rapids Dam including Rice Lake

Common Name	N¹	RC %
Common shiner	528	14.10%
Yellow perch	504	13.46%
Bluegill	448	11.97%
Spotfin shiner	379	10.12%
Shorthead redhorse	314	8.34%
Black crappie	254	6.79%
Northern pike	148	3.95%
White sucker	141	3.77%
Johnny darter	126	3.37%
Walleye	99	2.65%
Silver redhorse	96	2.56%
Smallmouth bass	92	2.46%
Pumpkinseed	85	2.27%
Logperch	69	1.85%
Trout-perch	69	1.85%
Mimic shiner	67	1.79%
Rock bass	66	1.76%
Central mudminnow	57	1.52%
Largemouth bass	41	1.10%
Yellow bullhead	35	0.93%
Finescale dace	21	0.56%
Channel catfish	13	0.35%
Fathead minnow	12	0.32%
Brook stickleback	12	0.32%
Greater redhorse	9	0.24%
Blacknose shiner	8	0.21%
Muskellunge	7	0.19%
Brook silverside	7	0.19%
Bowfin (dogfish)	7	0.19%
Hybrid sunfish	7	0.19%

Common Name	N ¹	RC %
Hornyhead chub	4	0.12%
Brown bullhead	3	0.08%
Golden shiner	3	0.08%
Burbot (eelpout)	3	0.08%
Longnose dace	2	0.05%
Brassy minnow	2	0.05%
Golden redhorse	2	0.05%
Blackchin shiner	1	0.03%
Bigmouth buffalo	1	0.03%
Bluntnose minnow	1	0.03%
Spottail shiner	1	0.03%
Total	3,744	100%

N¹: Numbers (N) represent those collected in the sub-reach from Project upstream to the Grand Rapids Dam and within Rice Lake, of which the associated RC% was used to represent the community composition of this reach that is susceptible to entrainment at the Project.

4.6 Turbine Survival Assessment Methods

Turbine survival for all target species was estimated using a theoretical blade strike probability and mortality model similar to the methods reported by Franke et al. (8)). The theoretical blade strike model provides an estimate of blade strike probability based on fish length and turbine design parameters that influence the likelihood of strike for a fish approaching a turbine runner and passing between two blades. For fish struck by a blade, probability of strike mortality is estimated using laboratory data from blade strike studies conducted with rainbow trout and multiple fish lengths, blade leading edge thicknesses, and strike velocities (14), (15). Predictive blade strike survival models are considered appropriate means for estimating turbine survival at low head projects (<100 ft) because other injury mechanisms (e.g., damaging pressure regimes, shear, and turbulence) are considered to be inconsequential or expected to produce very low injury and mortality rates (8). Alden has used the theoretical model to estimate turbine survival of Shortnose Sturgeon entrained through the units at the Hadley Falls Station (16), for Atlantic Salmon and kelts entrained at 15 projects in the Maine Penobscot River basin (17), for shad and herring at projects in Rhode Island and Connecticut, and for riverine fishes passing through turbines in the Holyoke Canal System (18), at three projects in Vermont (19) (20), and at a small project in Minnesota (21) (17). The results of these evaluations have been accepted by state and federal resource agencies and by FERC.

The probability that a fish will be struck by a turbine blade is a function of the distance over which blade leading edges move compared to the total distance between two consecutive leading edges in the time it takes a fish to be carried or swim past the arc of leading edge motion (Figure 4-1). Consequently, the probability of strike is identified in Equation 1 (9) (10):

$$P_S = \frac{nNL \cos \theta}{60V_{ax}} \quad \text{Equation 1}$$

Where:

- P_S = probability of strike (non-dimensional)
- n = runner rpm
- N = number of leading edges (blades)
- L = fish length
- θ = angle between absolute and axial velocity vectors (degrees)
- V_{ax} = axial velocity

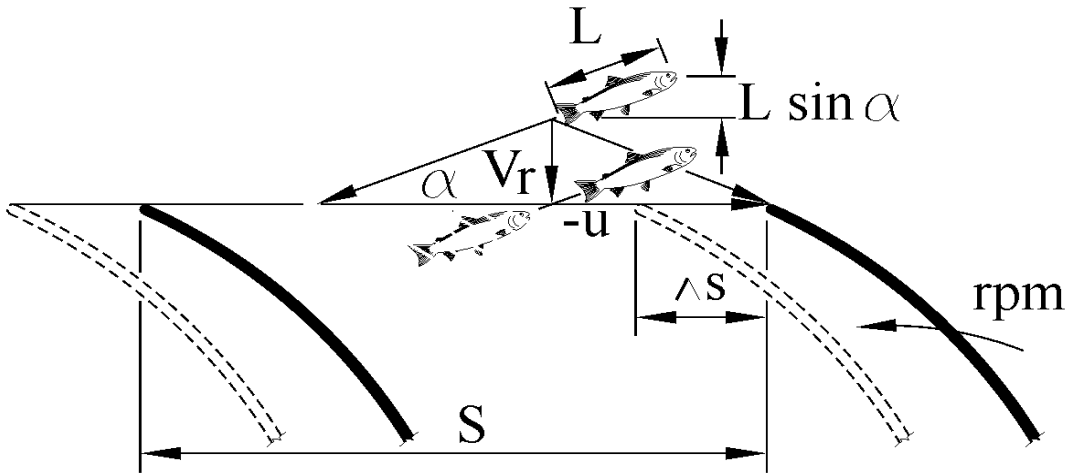


Figure 4-1 Schematic of Absolute Inflow, Axial Velocity, and Relative Velocity of Flow (and Fish) to a Blade Leading Edge. A Vertical Section of a Propeller Type Unit is depicted. The Parameter ΔS is the Incremental Blade Motion in the Time Fish Move through the Leading-Edge Circumference.

The strike probability model assumes that fish orient along the absolute inflow direction. Note that $\cos \theta = \sin \alpha$, where α is the angle between the absolute inflow velocity and a tangent line to the runner circumference. The parameter $L \cos \theta$ (or $L \sin \alpha$) is the projected fish length in the axial direction. The flow angle for axial-flow turbines is defined as the angle between the absolute velocity and tangential velocity, α .

The relative water-to-blade velocity (Equation 2) (i.e., strike velocity, assuming fish travel at the same speed as the approaching flow) is used with fish length-to-blade thickness ratios (L/t) to determine the strike mortality coefficient, K , based on data from blade strike tests conducted with rainbow trout (14) (15). Since K represents the probability that fish struck by a turbine blade will be killed, P_S (blade strike probability) is multiplied by K to estimate turbine passage survival (S_T):

$$S_T = 1 - (K)(P_S) \quad \text{Equation 2}$$

Other sources of injury and mortality associated with turbine passage (e.g., damaging pressure changes, shear, and turbulence) are not expected to impact fish passing through the Project turbines due to the

relatively low head of the project. Design and operation parameters for the Project turbines used in the calculations of blade strike probability and mortality are provided in Table 4-1.

5.0 Results and Discussion

The assessments of impingement and entrainment at the Project were conducted for fish species that comprise at least one percent of the species composition of the upstream populations based on available sampling data.

5.1 Factors Affecting Impingement, Entrainment, and Survival

Susceptibility to entrainment or impingement may be influenced by a number of factors and their representation at the Project (Table 5-1). Habitat conditions upstream of the intakes may influence the sizes, species, and type of fish susceptible to impingement and entrainment. Because of this, species such as Black Crappie may be more susceptible to entrainment if there is a shallow littoral zone near the intakes or if the shoreline provides an area for spawning because juveniles often group in schools and are at lengths less than 200 mm. Similarly, White Sucker juveniles <200mm may frequent shoreline areas and be subject to entrainment. Benthic species may have higher potential for entrainment due to common foraging habits that could lead them to the vicinity of the Project's intakes.

Table 5-1 Factors Influencing Fish Entrainment and Survival

Factor		Influence on Entrainment/Turbine Mortality ⁽¹⁾	Representation at the Project
Entrainment	Intake adjacent to shoreline	Near shore intakes may potentially entrain higher numbers of fish than offshore intakes due to tendency of fish to follow shorelines or orient to physical structures in shorelines.	Yes
	Intake location in littoral zone	The littoral zone (generally from the shoreline to extent of aquatic vegetation or approximately 10 ft deep) is the most productive region of a reservoir and is where most species spawn and rear their young.	No
	Abundant littoral zone fishes	Centrarchids and other reservoir species such as catfish that spend most of their lives in near shore habitats tend to be the most abundant species in an assemblage.	Yes
	Abundant clupeids	Entrainment rates may potentially be higher at projects where clupeids such as gizzard shad, threadfin shad, and alewife are relatively abundant.	No
	Obligatory migrants	Obligatory migrants are those species that must migrate within and between freshwater systems to fulfill certain life cycles. Depending on time of year, turbine flow can represent the majority of river flow cues while migrating downstream.	No
	Intake depth (ft at full pond)	Fish are usually more abundant in shallower portions of a reservoir year-round.	16
	Winter drawdown	Drawdowns may put fish in proximity to intakes.	No
	Normal hydraulic capacity (cfs)	Values used with respect to entrainment rate.	2,800
	Avg approach velocity (ft/s)	Approach velocities may correlate with intake rates, although siting may be more important. Velocities greater than fish burst swim speeds suggest potential inability to escape entrainment or impingement.	1.93 & 2.38

Factor		Influence on Entrainment/Turbine Mortality ⁽¹⁾	Representation at the Project
	Water quality	Poor water quality (e.g., stratification and low dissolved oxygen in the hypolimnion) may reduce fish susceptibility to entrainment	No
	Additional downstream passage routes	Sluiceways, spillways, or other bypass structures may reduce turbine entrainment by providing an alternate route of downstream passage.	Yes
Survival	Turbine type	The size of water passage spaces relative to fish size may increase the probability of contact with structural elements. Francis runners have more closely spaced bucket/blades than Kaplan/propeller-type units.	Francis - horizontal
	High speed (rpm)	Higher turbine speeds potentially increase the likelihood of fish contact with structural elements.	No
	Avg survival rates of small fish (<200 mm)	More than 90% of fishes entrained at hydro projects are small. High survival rates reduce the overall impact to fish populations.	87%
	Pressurized intake tunnel	High hydrostatic pressure in a penstock at high head sites may be suddenly released as fish acclimated to a higher pressure pass from pressurized areas of deep water to tailwaters at normal hydrostatic pressure. The sudden relief from high pressure increases the potential risk to fish of decompression trauma.	No

(1) From (6), (3), and (22)

5.2 Impingement Assessment

Physical exclusion is expected to occur for some larger fish of all species except common shiner, mimic shiner, spotfin shiner, johnny darter, logperch, trout-perch, and central mudminnow (Table 5-2). The estimated average approach velocity at the Project ranged from 1.93 to 2.38 feet per second (ft/s). Mean critical swim speeds ranged from 0.6 to 11.8 ft/s for all species assessed (Table 5-3). However, burst speeds of fish that are too large to pass through the bar spacing at the Project intake will be considerably higher than the critical swim speeds. Consequently, impingement on the trashrack is not expected to occur for any of the target species that reach a length at which they would be too large to pass through the 1.75-inch clear bar spacing.

Table 5-2 Total Length (TL) Information for Fish Species Upstream of the Project

Family	Species	Body Width/TL Ratio	Average TL (mm)	TL at 44-mm Body Width	Max TL (mm)	Physical Exclusion at Max TL ¹
Catostomidae	Shorthead Redhorse	0.13	408	211	750	Yes
	Silver Redhorse	0.13	325	205	740	Yes
	White Sucker	0.15	407	301	650	Yes
Centrarchidae	Black Crappie	0.10	275	443	490	Yes
	Bluegill	0.13	190	332	410	Yes
	Largemouth Bass	0.13	400	329	970	Yes
	Pumpkinseed	0.12	100	355	400	Yes
	Rock Bass	0.16	154	283	430	Yes
	Smallmouth Bass	0.13	80	340	690	Yes
Cyprinidae	Common Shiner	0.11	83	411	180	No
	Mimic Shiner	0.10	57	435	80	No
	Spotfin Shiner	0.11	70	390	110	No
Escodidae	Northern Pike	0.08	400	567	1370	Yes
Percidae	Johnny Darter	0.12	39	372	72	No
	Logperch	0.10	125	421	180	No
	Walleye	0.12	540	353	1070	Yes
	Yellow Perch	0.11	191	385	1220	Yes
Percopsidae	Trout-Perch	0.14	88	324	200	No
Umbridae	Central Mudminnow	0.14	81	306	140	No

- (1) Determination of whether physical exclusion from passing through the 1.75-inch clear spacing at the intake would occur based on body width at maximum total length

Table 5-3 Swim Speeds Reported in the Literature for Selected Target Species that Occur Upstream of the Project

Common Name	Scientific Name	Mean Length or Range (mm)	Mean Length Critical Swim Speed (ft/s)	Min Length (mm)	Min Length Critical Swim Speed (ft/s)	Max Length (mm)	Max Length Critical Swim Speed (ft/s)	Length for Burst Swim Speed (mm)	Burst Swim Speed (ft/s)	Reference	Surrogate
Black Crappie	<i>Pomoxis nigromaculatus</i>	170-371	1.6-2.4	160	1.1	NR	NR	NR	NR	(23), (24)	
Bluegill	<i>Lepomis macrochirus</i>	NR	NR	51	0.9	150	1.2	157.5	4.3	(25), (26), (27)	
Central Mudminnow	<i>Umbra limi</i>	109	0.7	NR	NR	NR	NR	NR	NR	(23)	Northern Pike
Common Shiner	<i>Luxilus cornutus</i>	36	1.4	36	1.4	NR	NR	63.5	4	(7), (23)	Mimic Shiner/Emerald Shiner
Johnny Darter	<i>Etheostoma nigrum</i>	36	1.3	NR	NR	NR	NR	NR	NR	(23)	Rio Grande Darter
Largemouth Bass	<i>Micropterus salmoides</i>	104	1.1-1.6	150	1.8	269	2.2	NR	NR	(23), (28), (29), (30)	
		56-112	0.7-1.6	NR	NR	NR	NR	NR	NR	(31), (32), (33), (34)	
Logperch	<i>Percina caprodes</i>	103	1.1	50	0.59	151	1.4			(23)	Yellow Perch
Mimic Shiner	<i>Notropis volucellus</i>	36	1.4	36	1.4	NR	NR	63.5	4	(7), (23)	Emerald Shiner for burst speeds
Northern Pike	<i>Esox lucius</i>	109	0.7	NR	NR	NR	NR	NR	NR	(23)	
		119-620	0.6-1.5	NR	NR	NR	NR	NR	NR	(35)	
Pumpkinseed	<i>Lepomis gibbosus</i>	127	1.2	NR	NR	NR	NR	NR	NR	(36)	
Rock Bass	<i>Ambloplites rupestris</i>	NR	NR	51	0.9	150	1.2	157.5	4.3	(25), (26), (27)	Bluegill
Shorthead Redhorse	<i>Moxostoma macrolepidotum</i>	NR	NR	396	3.4	434	5	NR	NR	Sustained speed: (37)	
Silver Redhorse	<i>Moxostoma anisurum</i>	NR	NR	518	3.2	559	4.6	NR	NR	Sustained speed: (37)	
Smallmouth Bass	<i>Micropterus dolomieu</i>	300	2.9	122	0.9	378	3.9	NR	NR	(23)	
		NR	NR	262	1.6	NR	NR	NR	NR	(38)	
Spotfin Shiner	<i>Cyprinella spiloptera</i>	307	2.2	NR	NR	NR	NR	NR	NR	(29)	
Trout-Perch	<i>Percopsis omiscomaycus</i>	NR	NR	NR	NR	NR	NR	NR	NR	No data	
Walleye	<i>Sander vitreus</i>	81-391	1.2-2.8	79	1.2	381	2.7	16-57	5.2-8.5	(23), (39)	
White Sucker	<i>Catostomus commersonii</i>	383	11.8	165	1.6	500	20	NR	NR	(23)	
		170	2	NR	NR	NR	NR	NR	NR	(35)	
Yellow Perch	<i>Perca flavescens</i>	103	1.1	50	0.59	151	1.4	NR	NR	(23)	

NR = not reported

5.3 Entrainment Estimates

In estimates derived from sites with similar characteristics as the Project's, black crappie had the highest entrainment rate of fish shorter than 200 mm, followed by white suckers (Table 5-4). Black Crappie entrainment was highest in mid- to late summer, and may have been due to both the fishes' tendency to travel in large groups and the summer peak of young-of-the-year fish (white sucker young typically orientate to shoreline features).

For the fish 200 to 380 mm long, entrainment was highest for Black Crappie and Shorthead Redhorse (Table 5-5). Black Crappie are usually found in areas near the shoreline which would make them more likely to encounter the Project's intake. Shorthead Redhorse is a benthic species that are likely to orientate to the bottom within the vicinity of the Project's intake structures. This contributes to the higher potential for entrainment for bottom feeding species at various life stages. Estimated total annual entrainment for all species combined was approximately 290,000 for fish less than 200 mm long and 5,600 for fish 200 to 380 mm long (Table 5-4, Table 5-5).

Table 5-4 Monthly and Annual Entrainment Estimates for Fish Less Than 200 mm in Length

Common Name	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Total
Black Crappie	446	380	233	5,660	1,047	972	11,502	55,557	24,228	5,317	13,838	5,450	124,631
Bluegill	0	0	129	485	270	1039	277	3,081	3,284	1,772	4,499	69	14,905
Central Mudminnow	0	0	46	138	130	0	0	0	0	0	31	0	346
Common Shiner	0	140	0	50	1,208	40	20	47	16	40	163	2135	3,858
JohnnyDarter	0	0	92	269	743	460	578	166	12	0	0	0	2,320
Largemouth Bass	0	199	312	349	5	4,819	8,674	1,250	2,602	971	5,013	345	24,540
Logperch	0	0	0	57	432	303	98	76	0	97	134	0	1,197
Mimic Shiner	668	1,213	896	58	336	886	105	48	0	17	128	633	4,988
Northern Pike	0	0	0	30	0	244	1,371	445	75	64	96	0	2,325
Pumpkinseed	156	71	175	144	266	624	523	1,352	5,658	2,052	1,276	571	12,868
Rock Bass	33	0	0	142	525	393	154	168	1,429	761	75	69	3,750
Shorthead Redhorse	0	0	0	13	7	1,887	223	216	318	740	96	139	3,638
Silver Redhorse	0	0	0	0	0	38	0	7	10	0	0	0	54
Smallmouth Bass	0	0	0	4	17	711	6,499	1,300	13,188	1472	323	199	23,712
Spotfin Shiner	0	0	0	0	0	0	0	36	32	0	0	0	68
Trout-perch	0	0	0	33	0	0	0	0	0	292	30	35	389
Walleye	0	0	0	33	8	1,229	1,496	1,941	1,102	1,074	252	189	7,326
White Sucker	120	81	115	157	259	8,826	21,648	447	88	1,875	200	235	34,050
Yellow Perch	88	140	23	4,850	1,838	921	5,087	1,306	3,377	2,629	2,958	280	23,499
Grand Total	1,512	2,226	2,022	12,472	7,093	23,390	58,256	67,443	55,418	19,173	29,110	10,351	288,465

Table 5-5 Monthly and Annual Entrainment Estimates for Fish with Lengths of 200 to 380 mm

Common Name	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Total
Black Crappie	0	0	0	69	28	130	24	353	662	45	11	39	1,361
Bluegill	0	0	0	16	0	5	4	2	0	0	16	0	43
Central Mudminnow	0	0	0	0	0	0	0	0	0	0	0	0	0
Common Shiner	0	0	0	0	0	0	0	0	0	0	0	0	0
Johnny Darter	0	0	0	0	0	0	0	0	0	0	0	0	0
Largemouth Bass	0	0	21	0	30	0	0	0	152	0	100	0	303
Logperch	0	0	0	0	0	0	0	0	0	0	0	0	0
Mimic Shiner	0	0	0	0	0	0	0	0	0	0	0	0	0
Northern Pike	0	0	0	12	21	16	0	0	0	45	16	0	109
Pumpkinseed	0	0	0	0	0	0	0	0	0	0	0	0	0
Rock Bass	71	0	0	5	104	28	2	21	96	39	6	0	372
Shorthead Redhorse	67	0	0	67	378	127	76	6	26	96	0	0	843
Silver Redhorse	0	0	0	0	0	0	0	0	0	0	0	0	0
Smallmouth Bass	0	0	0	5	67	50	102	58	256	106	0	0	643
Spotfin Shiner	0	0	0	0	0	0	0	0	0	0	0	0	0
Trout-perch	0	0	0	0	0	0	0	0	0	0	0	0	0
Walleye	0	0	0	52	144	150	41	29	31	124	39	0	610
White Sucker	17	0	50	38	35	42	5	77	220	55	89	16	645
Yellow Perch	0	0	50	56	26	42	74	88	214	62	61	0	672
Grand Total	154	0	122	319	833	589	327	634	1,657	572	338	55	5,600

5.4 Blade Strike and Turbine Survival

Turbine survival for units 1 and 2 ranged from 83.7 to 97.2%, whereas units 3, 4, and 5 ranged from 70.4 to 93.4% (Table 5-6, Table 5-7). For units 1 and 2, the average turbine survival based on calculations is 87.8% and for units 3, 4, and 5 it is 77.4%. The projected survival rate for all units combined at the Project is 82.6%.

Table 5-6 Turbine Survival Estimates by Fish Length for the Project Units 1 and 2

Fish Length	Blade Strike Probability (Ps)	Probability of Strike Mortality (PM)	Turbine Passage Survival (%) (Sr)
50	0.36	0.078	97.2
100	0.71	0.104	92.6
150	1.00	0.119	88.1
200	1.00	0.129	87.1
250	1.00	0.138	86.2
300	1.00	0.144	85.6
350	1.00	0.150	85.0
400	1.00	0.155	84.5
450	1.00	0.159	84.1
500	1.00	0.163	83.7

Table 5-7 Turbine Survival Estimates by Fish Length for the Project Units 3, 4, and 5

Fish Length	Blade Strike Probability (Ps)	Probability of Strike Mortality (PM)	Turbine Passage Survival (%) (Sr)
50	0.46	0.143	93.4
100	0.92	0.189	82.6
150	1.00	0.216	78.4
200	1.00	0.235	76.5
250	1.00	0.250	75.0
300	1.00	0.262	73.8
350	1.00	0.272	72.8
400	1.00	0.281	71.9
450	1.00	0.289	71.1
500	1.00	0.296	70.4

5.5 Mortality Estimates

Monthly and annual entrainment mortality estimates were calculated by multiplying entrainment numbers by the average turbine survival estimates for each size group, assuming that 40% of fish pass through units 1 and 2 and 60% through units 3 through 5 (i.e., unit 1 and 2 survival rates for each size group were multiplied by 0.4 and unit 3-5 rates were multiplied by 0.6, with the sum of the products used for the entrainment mortality calculations).

Black Crappie and White Sucker had the highest mortality for fish less than 200 mm long (Figure 5-1) and Black Crappie and Shorthead Redhorse had the highest mortality for fish 200 to 380 mm long. Both figures were simplified to include species with greater than 1% mortality. There was no estimated entrainment mortality for nine of the 19 species in the 200 to 380 mm size range (Figure 5-2). Overall, fish less than 200 mm long had total annual mortality estimates of approximately 36,000 (Table 5-8) and fish 200 to 380 mm long had a total annual mortality of approximately 1,200 (Table 5-9).

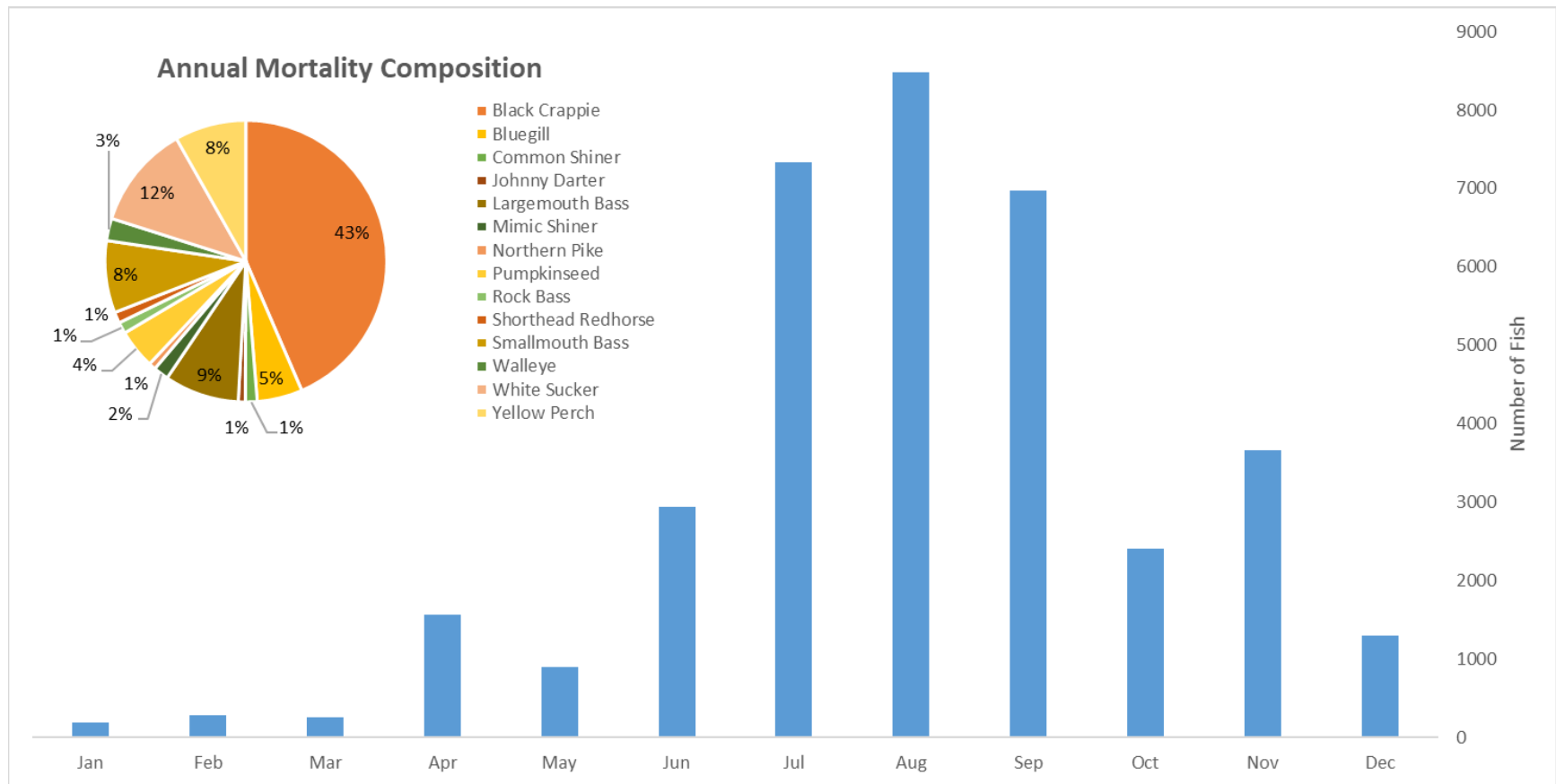


Figure 5-1 Combined Monthly and Annual Entrainment Mortality Estimates for Fish Species less than 200 mm (Includes only species with greater than 1% mortality)

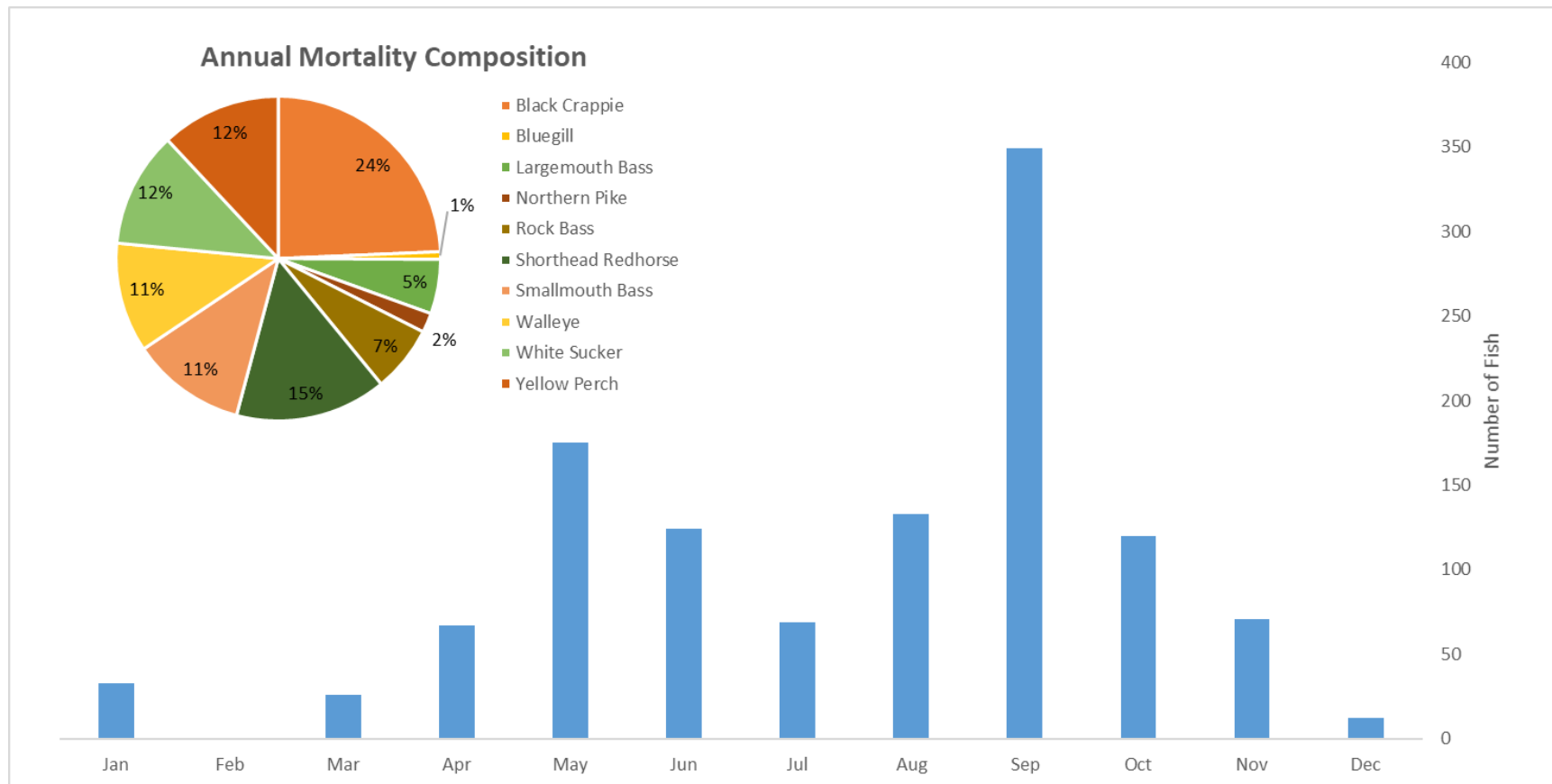


Figure 5-2 Combined Monthly and Annual Mortality Estimates for Fish Species 200 to 380 mm (Includes only species with greater than 1% mortality)

Table 5-8 Monthly and Annual Entrainment Mortality Estimates for Fish Less Than 200 mm in Length

Common Name	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Total
Black Crappie	56	48	29	712	132	122	1447	6989	3048	669	1741	686	15679
Bluegill	0	0	16	61	34	131	35	388	413	223	566	9	1875
Central Mudminnow	0	0	6	17	16	0	0	0	0	0	4	0	43
Common Shiner	0	18	0	6	152	5	3	6	2	5	21	269	485
Johnny Darter	0	0	12	34	93	58	73	21	1	0	0	0	292
Largemouth Bass	0	25	39	44	1	606	1091	157	327	122	631	43	3087
Logperch	0	0	0	7	54	38	12	10	0	12	17	0	151
Mimic Shiner	84	153	113	7	42	111	13	6	0	2	16	80	628
Northern Pike	0	0	0	4	0	31	172	56	9	8	12	0	292
Pumpkinseed	20	9	22	18	33	78	66	170	712	258	160	72	1619
Rock Bass	4	0	0	18	66	49	19	21	180	96	9	9	472
Shorthead Redhorse	0	0	0	2	1	237	28	27	40	93	12	17	458
Silver Redhorse	0	0	0	0	0	5	0	1	1	0	0	0	7
Smallmouth Bass	0	0	0	1	2	89	818	163	1659	185	41	25	2983
Spotfin Shiner	0	0	0	0	0	0	0	5	4	0	0	0	9
Trout-perch	0	0	0	4	0	0	0	0	0	37	4	4	49
Walleye	0	0	0	4	1	155	188	244	139	135	32	24	922
White Sucker	15	10	14	20	33	1110	2723	56	11	236	25	30	4284
Yellow Perch	11	18	3	610	231	116	640	164	425	331	372	35	2956
Grand Total	190	280	254	1569	892	2942	7329	8484	6972	2412	3662	1302	36289

Table 5-9 Monthly and Annual Entrainment Mortality Estimates for Fish with Lengths of 200 to 380 mm

Common Name	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Total
Black Crappie	0	0	0	14	6	27	5	74	140	10	2	8	287
Bluegill	0	0	0	3	0	1	1	0	0	0	3	0	9
Central Mudminnow	0	0	0	0	0	0	0	0	0	0	0	0	0
Common Shiner	0	0	0	0	0	0	0	0	0	0	0	0	0
Johnny Darter	0	0	0	0	0	0	0	0	0	0	0	0	0
Largemouth Bass	0	0	4	0	6	0	0	0	32	0	21	0	64
Logperch	0	0	0	0	0	0	0	0	0	0	0	0	0
Mimic Shiner	0	0	0	0	0	0	0	0	0	0	0	0	0
Northern Pike	0	0	0	2	4	3	0	0	0	9	3	0	23
Pumpkinseed	0	0	0	0	0	0	0	0	0	0	0	0	0
Rock Bass	15	0	0	1	22	6	0	4	20	8	1	0	78
Shorthead Redhorse	14	0	0	14	80	27	16	1	5	20	0	0	178
Silver Redhorse	0	0	0	0	0	0	0	0	0	0	0	0	0
Smallmouth Bass	0	0	0	1	14	11	21	12	54	22	0	0	135
Spotfin Shiner	0	0	0	0	0	0	0	0	0	0	0	0	0
Trout-perch	0	0	0	0	0	0	0	0	0	0	0	0	0
Walleye	0	0	0	11	30	32	9	6	6	26	8	0	129
White Sucker	4	0	11	8	7	9	1	16	46	12	19	3	136
Yellow Perch	0	0	11	12	5	9	16	19	45	13	13	0	141
Grand Total	33	0	26	67	175	124	69	133	349	120	71	12	1179

6.0 Conclusion

Using a desktop analysis approach, the annual average number of fish less than 200 mm long expected to become entrained at the Project is approximately 290,000. Of that, approximately 36,000 will suffer mortality from entrainment. It was estimated that approximately 5,600 fish would become entrained with total lengths of 200 to 380 mm, and of those, approximately 1,200 suffering mortality. These estimations are based on species lists and relative composition data from the Mississippi River between Brainerd and the Grand Rapids Dam, entrainment data from the EPRI database, and the Project's operational specifications.

Physical exclusion is expected to occur for some larger fish of all species except Common Shiner, Mimic Shiner, Spotfin Shiner, Johnny Darter, Logperch, Trout-perch, and Central Mudminnow. Consequently, impingement on the trashrack is not expected to occur for any of the target species that reach a length at which they would be too large to pass through the 1.75-inch clear bar spacing.

Based on our evaluation and sampling by the MNDNR, population dynamics in the reach would remain as is and the status quo of Muskellunge and other game species, both above and below the Project, would be maintained. Black Crappie were estimated to have the highest entrainment and mortality rates for both size classes. The projected survival rate for all units combined at the Project is 82.6%.

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Memorandum

To: File
From: Daniel Tix, PhD and Shanna Braun
Subject: Botanical Resources Review for Brainerd Public Utilities
Date: 11/30/2018
Project: BPU – FERC Relicensing, Revised Study Plan

Background

FERC requested a Botanical Resources Study in a letter dated June 27, 2018 to map and/or confirm vegetation types within the Project boundary, including age-class and composition of forested area; rare, threatened, or endangered plant species or potential habitats; and document presence, absence, and location of invasive plant species.

In its August 20, 2018 Proposed Study Plan (PSP), BPU did not adopt this study request for the following reasons:

- The Project is operated as a run-of-river project and maintains a target elevation of 1174.04 feet, with fluctuations limited to 0.1 foot. As such, adjacent lands experience little change in water elevation, posing minimal change to vegetation communities and habitat types.
- There are no federally listed threatened or endangered plant species found in Crow Wing County, where the Project is located. In addition, there are no designated critical habitats for any federally listed species in Crow Wing County.
- Based on review using the Minnesota Department of Natural Resources (MNDNR) Natural Heritage Inventory System (NHIS) database, there are no state-listed plant species in the vicinity of the Project boundary.
- The Minnesota Department of Agriculture's Noxious Weed Mapper was reviewed to assess the presence of noxious weed infestations within the Project boundary. There are three mapped noxious weed occurrences in the Project area: two purple loosestrife occurrences observed in 2007/2008 and one common tansy occurrence observed in 2013. Mapped noxious weed occurrences are included in the attached Noxious Weed Records figure. This information was not included in the PAD.
- The only land BPU owns adjacent to the Project boundary is immediately surrounding the dam and auxiliary facilities. This land primarily comprises access roadways and facility structures. BPU actively mows and manages weeds on green spaces associated with these areas.
- BPU does not own or manage additional lands beyond the Project boundary limits and is not authorized to dictate vegetation management, including noxious weed control, of these lands.

In its November 6, 2018 letter providing comments on the PSP, FERC requested additional, site-specific data on botanical resources occurring at the project to analyze the range of effects to botanical and wildlife resources at the project. This memorandum includes the finding of additional botanical resources review.

Botanical Resources Review

Barr Botanist (Daniel Tix, PhD) performed a site-specific desktop botanical resources analysis based on review of available, relevant photographs from other work Barr has performed in the project boundary. The area reviewed included the area of the project facilities and the riparian corridor upstream and northeast of the project to County Road 3 as this reflected the special boundaries of the study area specified by FERC in its study request (see Attachment 1).

Historical Review

A review of aerial photography from 1937 (Attachment 2) shows the land along the north and south side of the botanical analysis area were mostly open, free of trees. Small patches of trees were present, on the north side of a road north of the reservoir. As such, vegetation within the area evaluated is predominantly secondary growth.

Species List

Based on the desktop review, the following plant species occur in the analysis area:

- Penn Sedge (*Carex pennsylvanica*)
- White snakeroot (*Ageratina altissima*)
- Meadow rue (*Thalictrum* spp.)
- Elm (*Ulmus* spp.)
- Oak (*Quercus* spp.)
- Willow shrubs (*Salix* spp.)
- Willow trees (*Salix* spp.) – likely black willow (*S. nigra*) or possibly peach-leaved willow (*S. amygdaloides*), crack willow (*S. fragilis*), or whitecrack willow (*S. rubens*)
- Red pine (*Pinus resinosa*)
- River grape (*Vitis riparia*)
- Sumac (*Rhus* spp.)
- Cottonwood (*Populus deltoides*)

Representative photos are included as Attachment 3.

Age Class, Species Composition, and Relative Density of Forested Understory

Trees within the forested upland area above the banks appear to be approximately 40 to 60 feet tall. These trees are likely more than 40 years old, but not older than 80 years. Large trunks were not observed; as such, there is no evidence of trees more than 100 years old. It is possible that some older and larger trees are present, but these are not evident from the shoreline.

Some red pines were observed that appear to be planted in rows. They appear to be 50 to 70 feet tall and are presumably 40 to 60 years old. They are mostly on the northern shore in discontinuous patches; there is not a single plantation.

An island within the analysis area has several smaller trees, likely willow, green ash, and elm that have relatively sparse canopy cover. Trees are likely 30 to 50 years old. Dense shrubs are also present with river grape and possibly other vines.

Within the evaluation area, the forested understory appears to have moderate coverage of shrubs and understory woody species. There also appears to be relatively thorough cover of the forest floor with herbaceous species. In general, the forested habitat appears to be relatively low quality secondary growth that is dominated by native trees, shrubs, and herbaceous species; though, portions are apparently planted pine. The species composition is typical of other common native forest stands in relatively disturbed habitats.

Presence of Snags or Old-growth Hardwoods with Sloughing Bark

Some snags are present, but since the forest areas reviewed appear to be relatively young and comprised of secondary growth, there are not many large dead trees. Most of the snags are likely smaller. Most of the sloughing bark likely occurs on dead branches of living trees or smaller dead trees.

Invasive Species

The Minnesota Department of Agriculture's Noxious Weed Mapper was again reviewed in November 2018 to assess the presence of noxious weed infestations within the analysis area, with additional emphasis given to the vicinity of County Road 3. Common tansy was recorded upstream of the analysis area, but no noxious weed species were recorded within the analysis area (Attachment 1).

One invasive species, reed canary grass (*Phalaris arundinacea*), was observed along the shorelines within the analysis area. Coverage was relatively light and confined to the shoreline due to steep shoreline slopes and wooded coverage of the area upslope and open water below.

Attachments

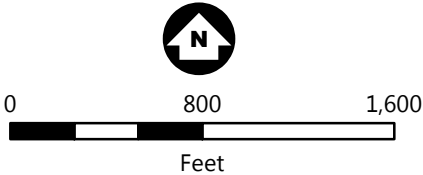
Attachment 1 – Botanical Study Figure

Attachment 2 – 1937 Aerial Image

Attachment 3 – Representative Photos



- River Mile Marker
- Dam Location
- Project Boundary
- Botanical Analysis Area
- Noxious Weed Record
- Common Tansy
- Major Roadway





Evaluation Area

Attachment 2
Exhibit E-8
1937 Aerial Imagery



Photo 1 – Shoreline taken from dam, view northwest



Photo 2 – Shoreline taken from dam, view northeast



Photo 3 – Representative shoreline in analysis area, view northwest



Photo 4 – Representative shoreline close-up in analysis area, view west



Photo 5 – Representative shoreline taken from northeast side of island, view south.



Photo 6 – Representative shoreline taken from vicinity of County Road 3 bridge, view south



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Minnesota-Wisconsin Ecological Services Field Office
4101 American Blvd E
Bloomington, MN 55425-1665
Phone: (952) 252-0092 Fax: (952) 646-2873
<http://www.fws.gov/midwest/Endangered/section7/s7process/step1.html>



In Reply Refer To:
Consultation Code: 03E19000-2017-SLI-0538
Event Code: 03E19000-2018-E-00835
Project Name: Brainerd Dam FERC License Renewal

February 14, 2018

Subject: Updated list of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The attached species list identifies any federally threatened, endangered, proposed and candidate species that may occur within the action area the area that is likely to be affected by your proposed project. The list also includes any designated and proposed critical habitat that overlaps with the action area. This list is provided to you as the initial step of the consultation process required under section 7(c) of the Endangered Species Act, also referred to as Section 7 Consultation.

Section 7 of the Endangered Species Act of 1973 requires that actions authorized, funded, or carried out by Federal agencies not jeopardize federally threatened or endangered species or adversely modify designated critical habitat. To fulfill this mandate, Federal agencies (or their designated non-federal representatives) must consult with the Service if they determine their project may affect listed species or critical habitat. Agencies must confer under section 7(a)(4) if any proposed action is likely to jeopardize species proposed for listing as endangered or threatened or likely to adversely modify any proposed critical habitat.

Under 50 CFR 402.12(e) (the regulations that implement Section 7 of the Endangered Species Act) the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally. You may verify the list by visiting the ECOS-IPaC website <http://ecos.fws.gov/ipac/> at regular intervals during project planning and implementation and completing the same process you used to receive the attached list. As an alternative, you may contact this Ecological Services Field Office for updates.

Please use the species list provided and visit the U.S. Fish and Wildlife Service's Region 3 Section 7 Technical Assistance website at - <http://www.fws.gov/midwest/endangered/section7/>

[s7process/index.html](#). This website contains step-by-step instructions that will help you determine if your project will have an adverse effect on listed species or critical habitat and will help lead you through the Section 7 process.

For all **wind energy projects** and **projects that include installing towers that use guy wires or are over 200 feet in height**, please contact this field office directly for assistance, even if no federally listed plants, animals or critical habitat are present within the action area.

Although no longer protected under the Endangered Species Act, be aware that bald eagles (*Haliaeetus leucocephalus*) are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*) and Migratory Bird Treaty Act (16 U.S.C. 703 *et seq.*), as are golden eagles (*Aquila chrysaetos*). Projects affecting these species may require measures to avoid harming eagles or may require a permit. If your project is near a bald eagle nest or winter roost area, see our Eagle Permits website at <http://www.fws.gov/midwest/midwestbird/EaglePermits/index.html>. The information available at this website will help you determine if you can avoid impacting eagles or if a permit may be necessary.

We appreciate your concern for threatened and endangered species. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- Migratory Birds

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Minnesota-Wisconsin Ecological Services Field Office

4101 American Blvd E

Bloomington, MN 55425-1665

(952) 252-0092

Project Summary

Consultation Code: 03E19000-2017-SLI-0538

Event Code: 03E19000-2018-E-00835

Project Name: Brainerd Dam FERC License Renewal

Project Type: ** OTHER **

Project Description: The project includes renewal of the facility's existing FERC license.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/46.4162336541563N94.15018854453277W>



Counties: Crow Wing, MN

Endangered Species Act Species

There is a total of 2 threatened, endangered, or candidate species on this species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

Mammals

NAME	STATUS
Gray Wolf <i>Canis lupus</i> Population: MN There is final critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4488	Threatened
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see maps of where birders and the general public have sighted birds in and around your project area, visit E-bird tools such as the [E-bird data mapping tool](#) (search for the name of a bird on your list to see specific locations where that bird has been reported to occur within your project area over a certain timeframe) and the [E-bird Explore Data Tool](#) (perform a query to see a list of all birds sighted in your county or region and within a certain timeframe). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Bittern <i>Botaurus lentiginosus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/6582	Breeds Apr 1 to Aug 31

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Dec 1 to Aug 31
Black Tern <i>Chlidonias niger</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/3093	Breeds May 15 to Aug 20
Black-billed Cuckoo <i>Coccyzus erythrophthalmus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9399	Breeds May 15 to Oct 10
Bobolink <i>Dolichonyx oryzivorus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 20 to Jul 31
Cape May Warbler <i>Setophaga tigrina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Jun 1 to Jul 31
Connecticut Warbler <i>Oporornis agilis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Jun 15 to Aug 10
Eastern Whip-poor-will <i>Antrostomus vociferus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Aug 20
Evening Grosbeak <i>Coccothraustes vespertinus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 15 to Aug 10
Golden Eagle <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds Jan 1 to Aug 31
Golden-winged Warbler <i>Vermivora chrysoptera</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8745	Breeds May 1 to Jul 20

NAME	BREEDING SEASON
Harris's Sparrow <i>Zonotrichia querula</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Marbled Godwit <i>Limosa fedoa</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9481	Breeds elsewhere
Olive-sided Flycatcher <i>Contopus cooperi</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3914	Breeds May 20 to Aug 31
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10
Rusty Blackbird <i>Euphagus carolinus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Jul 20
Semipalmated Sandpiper <i>Calidris pusilla</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Wood Thrush <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 31
Yellow Rail <i>Coturnicops noveboracensis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9476	Breeds May 15 to Sep 10

Probability Of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in your project's counties during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

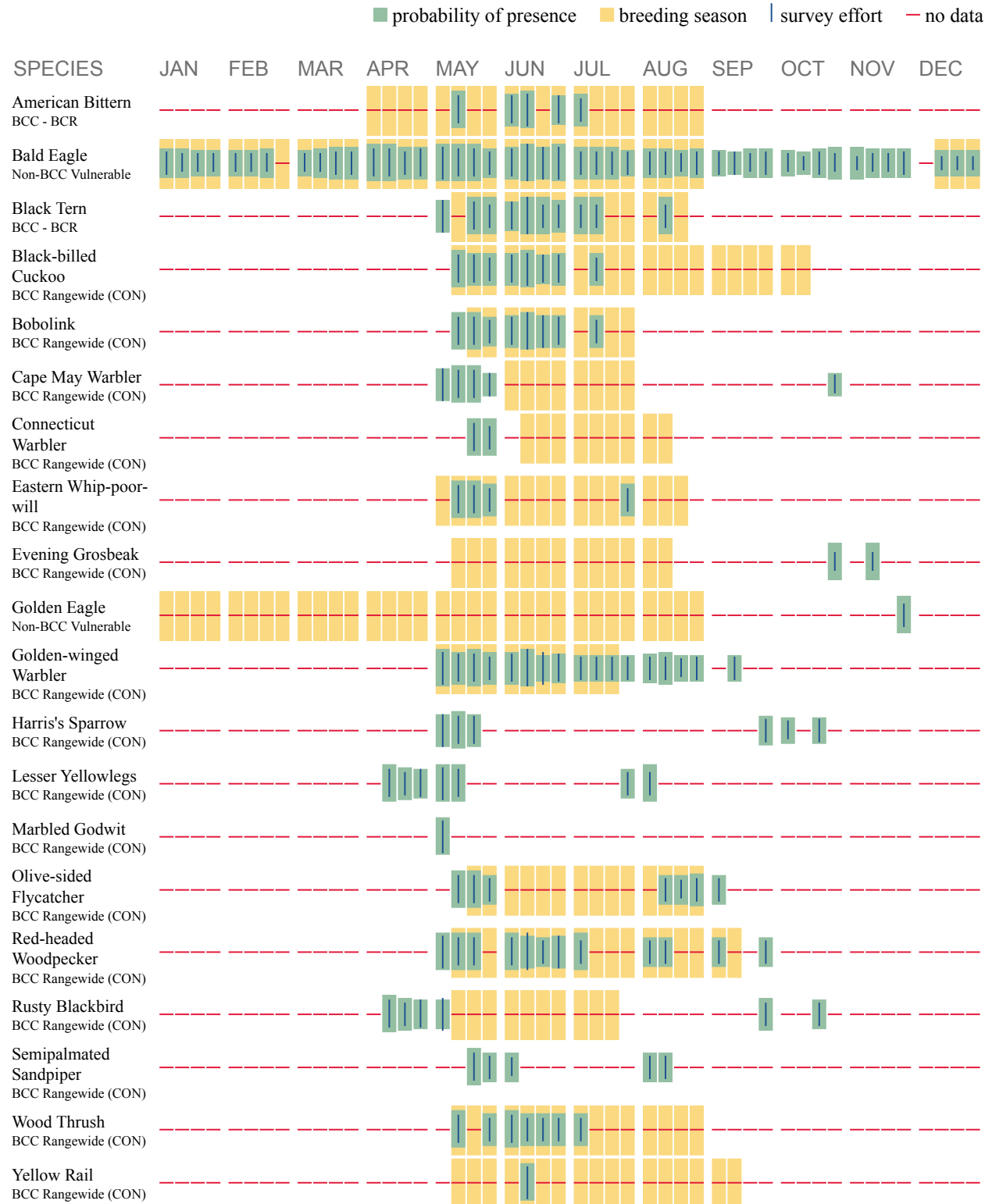
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the counties of your project area. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information.



Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

Migratory Birds FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) and/or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the counties which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [E-bird Explore Data Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: The [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird entry on your migratory bird species list indicates a breeding season, it is probable that the bird breeds in your project's counties at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical](#)

[Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

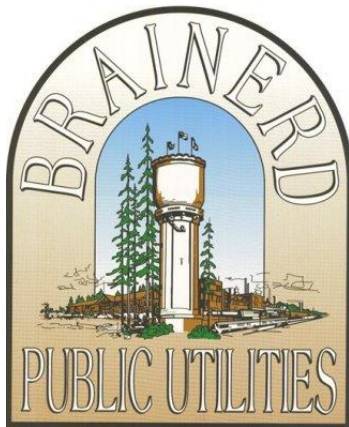
What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the BGEPA should such impacts occur.

Recreation Use and Inventory Study

Brainerd Hydroelectric Project *FERC License No. 2533*

Prepared for:
Brainerd Public Utilities
Brainerd, Minnesota



January 22, 2020

Available for Public Release

Recreation Use and Inventory Study Brainerd Hydroelectric Project

January 22, 2020

Preface

Brainerd Public Utilities (BPU) began the renewal process for the Federal Energy Regulatory Commission (FERC) license of the Brainerd Hydroelectric Project FERC Project No. 2533 (Project). This Recreation Use and Inventory Study was requested by the FERC and Minnesota Department of Natural Resources (MNDNR) to generate current inventory and use information of existing recreation opportunities. FERC has responsibility for ensuring compliance with Section 10(a) of Federal Power Act and that recreation facilities meet recreational demand over the term of the new license. FERC policy requires licensees to provide reasonable public recreation opportunities consistent with safe, effective facility operations.

BPU provides recreational opportunities within the Project Boundary in accordance with the conditions of its existing license. It also has a responsibility for ongoing monitoring of the recreation facilities within the Project Boundary and maintenance of its recreation facilities throughout the license term (1). FERC requires licensed projects to provide reasonable public recreation opportunities consistent with the safe and effective operation of the Project. FERC also has ongoing responsibility to ensure that those recreation facilities meet recreational demand over the term of the new license.

MNDNR requested recreational-use surveys be completed for flowing and impounded stretches of the river but did not provide spatial boundaries in their request. As such, the Recreation Use and Inventory Planning Study extents were primarily limited to the four facilities located within the Project Boundary (canoe portage, Lum Park, French Rapids access, and Green's Point access) as directed by FERC, during study plan development.

Recreation Use and Inventory Study Brainerd Hydroelectric Project

January 22, 2020

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Appendix D	Recreational Use Survey Raw Data

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Abbreviations and Acronyms

BPU	Brainerd Public Utilities
FERC	Federal Energy Regulatory Commission
MNDNR	Minnesota Department of Natural Resources
Project	Brainerd Hydroelectric Project
RSP	Revised Study Plan

Definitions

Licensee: The license was issued to the city of Brainerd and its Brainerd Public Utilities Commission (BPUC). Brainerd Public Utilities (BPU) manages the Project.

Project: Brainerd Hydroelectric Project, Federal Energy Regulatory Commission (FERC) No. 2533 (Project)

Project Boundary: The boundary line defined in the Project license issued by the FERC that surrounds the "...lands necessary for the operation and maintenance of the Project and for other Project purposes..." (2)

Relicensing: The process of acquiring a new FERC license for an existing hydropower project under expiration of the existing FERC license

1.0 Introduction

Brainerd Public Utilities (BPU) is in the process of relicensing the Brainerd Hydroelectric Project (Project) with the Federal Energy Regulatory Commission (FERC). As required by the December 10, 2018 Revised Study Plan (RSP) (3) for the Project, this document describes the Recreation Use and Inventory Planning Study completed in 2019.

Section 4(e) and 10(a) of the Federal Power Act require that FERC give equal consideration to all uses of the waterway on which a project is located. In making its license decision, FERC must equally consider the environmental, recreational, fish and wildlife, and other non-developmental values of the Project, as well as power and developmental values.

The Project allows for and supports several recreation opportunities, including boating, hiking, fishing, watersports, and passive recreation activities. As such, the Project's effects on recreational resources is relevant to FERC's public interest determination.

2.0 Project Overview

The Project is owned and operated by the city of Brainerd and its Public Utilities Commission under a license from the FERC as Project No. 2533. The Project is located in Crow Wing County on the Mississippi River near the northeast side of Brainerd, Minnesota, as shown in Figure 2-1. The Project is located approximately 130 miles north of the Minneapolis – St. Paul metropolitan area.

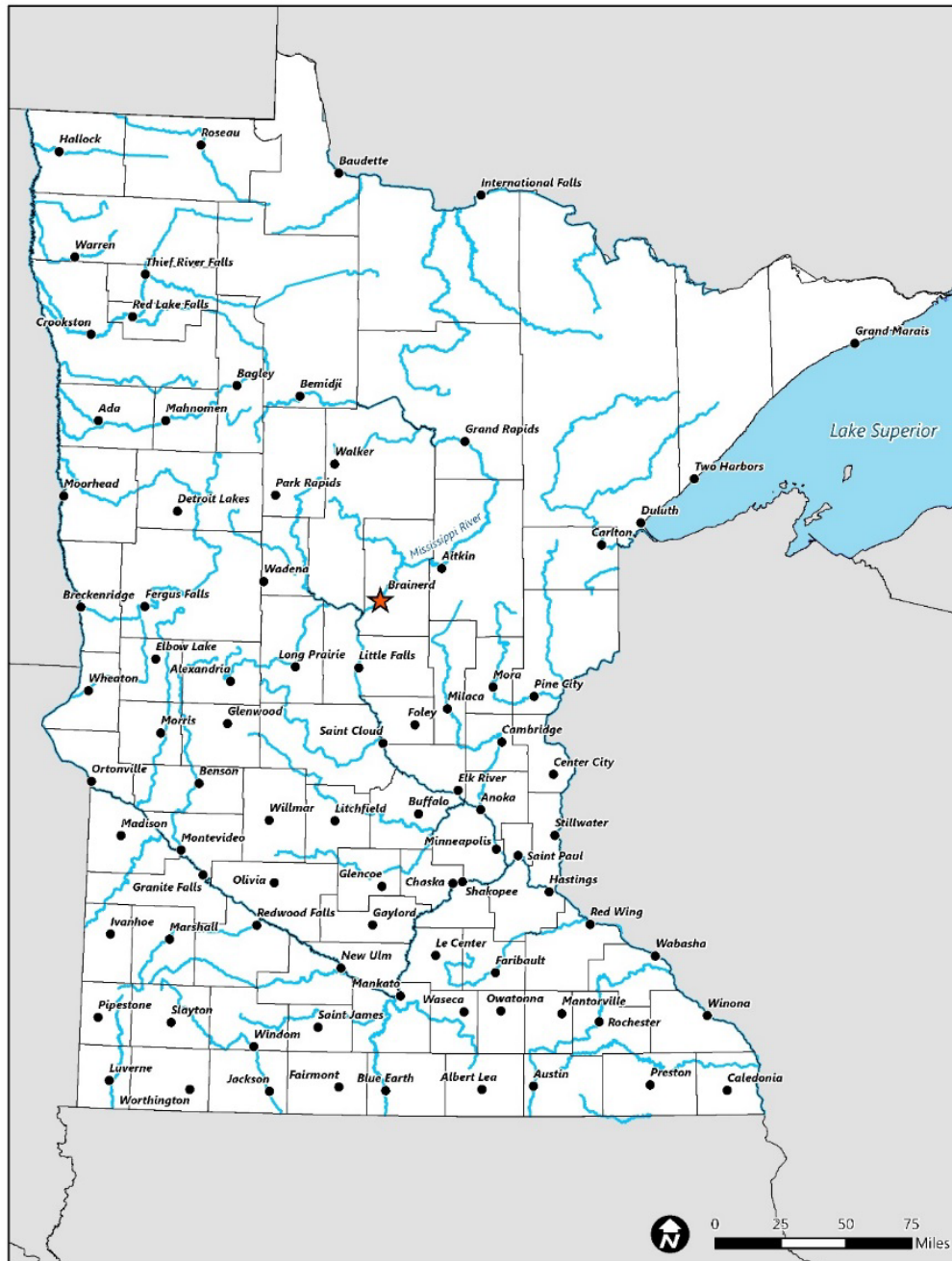


Figure 2-1 Project Location

From the left bank of the Mississippi River (looking downstream), the Project consists of a short left embankment, a 256-foot-long powerhouse, a 78-foot-long slide gate section, a 207-foot-long bascule (crest) gate section, a single 20-foot-wide steel tainter gate, and a 200-foot-long right embankment, as shown in Figure 2-2. The Project is located on land owned by BPU and is a run-of-river hydroelectric project, with an authorized installed capacity of 3,542.5 kilowatts.

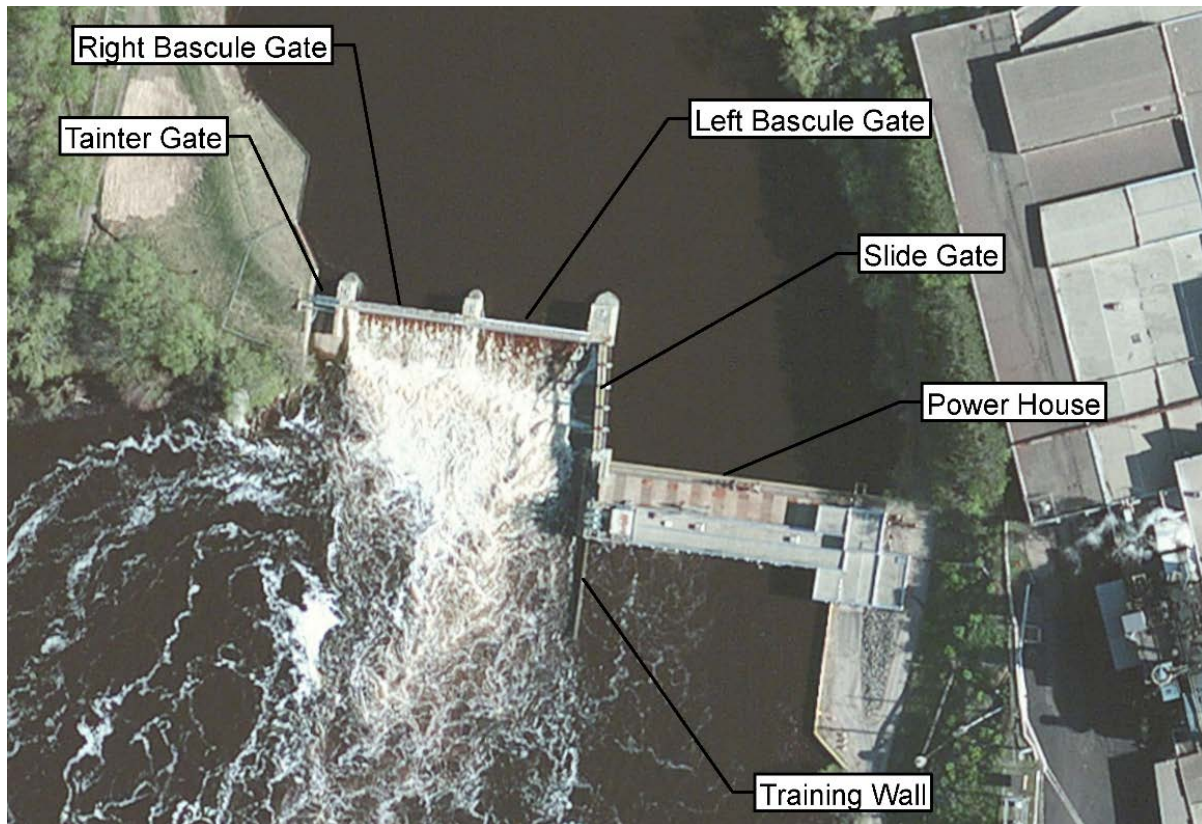


Figure 2-2 Project Overview

2.1 Study Boundary

This recreation use and inventory study focused on recreational use areas within the Project Boundary, including a canoe portage, Lum Park, French Rapids access, and Green's Point access. The location of these facilities is shown on Figure 2-3 and defined further in Section 5.0.



- Brainerd Dam
- Project Boundary
- Major Highway
- Carry-in/Portage
- Trailer Launch

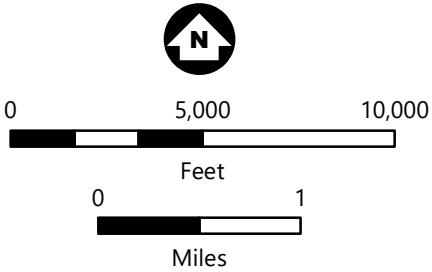


Figure 2-3

RECREATION STUDY AREA
Brainerd Hydroelectric Project
Exhibit E-10
Brainerd Public Utilities

3.0 Study Goals and Objectives

3.1 Goals and Objectives

The recreation use and inventory planning study was proposed to assess the condition and usage of recreation sites and associated facilities within the Project Boundary. This study was requested by the Minnesota Department of Natural Resources (MNDNR) with comments for consideration provided by the FERC.

The goals of this study were to gather information from existing recreation sites and associated facilities, evaluate existing recreational use and capacity, and estimate future recreation demands within the Project Boundary. The goals of this study were met by performing the following objectives:

- Identify the condition of all informal and formal recreation sites and facilities wholly or partially within the Project Boundary;
- Determine current and projected capacity at each recreation site/facility;
- Identify who owns, operates, and maintains each recreation site/facility; and
- Conduct visitor surveys during the recreation season to determine the adequacy of Project recreation facilities and whether modifications or upgrades are needed to meet current or future recreation needs.

4.0 Methods

This section describes methods used for data collection and data analysis of 2019 study elements, including facility inventory and condition assessment, recreation use, and spot counts. The study plan required BPU to conduct studies at recreation sites located within the Project Boundary (Figure 2-3).

4.1 Facility Inventory and Condition Assessment

The facility inventory and condition assessment included a brief description for each site and location of the facilities in relation to the Project Boundary. A worksheet was developed to consistently document and address the site conditions (Appendix A). BPU used the worksheet to assign ratings to different project features ranging from restroom facility condition to the amount of erosion found along the shoreline. The following items were addressed:

- Identification of whether or not the facility is located within the Project Boundary
- Ownership and party responsible for operation and maintenance of each facility
- Type, number, and condition of amenities provided, including parking and signage
- General observations of site use and accessibility
- Identification of areas that show signs of erosion or other forms of instability

Facilities were assigned a condition rating score ranging from 1 to 5, as defined in Table 4-1.

Table 4-1 Facility Inventory and Assessment Condition Rating Scale

Rating	Condition	Description
1	Poor	Critically damaged, needs immediate repair or replacement, past intended life use
2	Marginal	Is defective and in need of replacement, but is still in a workable condition
3	Adequate	Is moderately deteriorated, has not exceeded its intended life use, minor compliance issues
4	Good	May be slightly defective, no longer new, is overall functional and in working condition
5	Excellent	In new or like new condition, no visible defects

Online resources, local knowledge, and signage were used to determine hours and seasons of operation. Many of these areas are maintained within appropriate seasonal conditions. Photographs were taken as a means to visually document facility conditions. Representative photos are included in Section 5.0 of this document with larger images in Appendix B.

4.2 Recreation Use Survey

BPU conducted a recreation use survey at each of the four sites included in the facility inventory and condition assessment effort. A recreational use survey questionnaire was developed to assist with consistent data collection (Appendix C). The questionnaire was converted to an electronic, tablet-based format for BPU staff to use on site. Collected data was automatically uploaded to an online storage space, allowing for more reliable data backup during the survey period.

The schedule for the recreational use surveys was created in accordance with the RSP (3). All sampling days and times were randomly selected to account for variable time of day use patterns (Table 4-2). The recreation use surveys were completed during the recreation season to capture recreational use occurring while the facilities were open to the public. The recreation season for this Project was defined as the opening weekend of fishing season (mid-May) to the opening weekend of waterfowl hunting season (late September).

The recreation use survey was administered to facility users to gain user feedback on existing recreation facilities and opportunities. This survey recorded the number of people in a party, their primary reason for visiting the site (i.e., type of recreation), their perception of level of site use, and their opinions on the amount and types of recreation opportunities offered within the Project Boundary.

4.3 Spot Counts

Spot counts were conducted in conjunction with the recreation use survey. Spot counts were intended to be brief in duration to provide a snapshot of use at each recreation site. Spot counts lasted approximately 5 minutes and recorded the number of vehicles parked at a site and the number of trailers. This information was also collected electronically via tablet and was used in estimating site use.

Table 4-2 Recreation Survey Schedule

Month	Date	Survey Order	Time	Weekday/ Weekend/ Holiday
May	May 24, 2019 Friday	Green's Point access	8:00-10:00 am	Weekday
		Canoe Portage	10:15am-12:15pm	
		Lum park	1:00-3:00 pm	
		French Rapids access	3:15-5:15 pm	
	May 26, 2019 Sunday	French Rapids access	8:00-10:00 am	Holiday Weekend (Memorial Day)
		Lum park	10:15am-12:15pm	
		Green's Point access	1:00-3:00 pm	
		Canoe Portage	3:15-5:15 pm	
	May 28, 2019 Tuesday	French Rapids access	8:00-10:00 am	Weekday
		Canoe Portage	10:15am-12:15pm	
		Green's Point access	1:00-3:00 pm	
		Lum park	3:15-5:15 pm	
	May 30, 2019 Thursday	French Rapids access	8:00-10:00 am	Weekday
		Lum park	10:15am-12:15pm	
		Canoe Portage	1:00-3:00 pm	
		Green's Point access	3:15-5:15 pm	
June	June 6, 2019 Thursday	Lum park	8:00-10:00 am	Weekday
		Canoe Portage	10:15am-12:15pm	
		Green's Point access	1:00-3:00 pm	
		French Rapids access	3:15-5:15 pm	
	June 15, 2019 Saturday	Green's Point access	8:00-10:00 am	Weekend
		French Rapids access	10:15am-12:15pm	
		Lum park	1:00-3:00 pm	
		Canoe Portage	3:15-5:15 pm	
	June 19, 2019 Wednesday	French Rapids access	8:00-10:00 am	Weekday
		Lum park	10:15am-12:15pm	
		Green's Point access	1:00-3:00 pm	
		Canoe Portage	3:15-5:15 pm	
	June 23, 2019 Sunday	Lum park	8:00-10:00 am	Weekend
		French Rapids access	10:15am-12:15pm	
		Canoe Portage	1:00-3:00 pm	
		Green's Point access	3:15-5:15 pm	

Month	Date	Survey Order	Time	Weekday/ Weekend/ Holiday
July	July 6, 2019 Saturday	Canoe Portage	8:00-10:00 am	Holiday Weekend (4th of July)
		Lum park	10:15am-12:15pm	
		French Rapids access	1:00-3:00 pm	
		Green's Point access	3:15-5:15 pm	
	July 14, 2019 Sunday	French Rapids access	8:00-10:00 am	Weekend
		Green's Point access	10:15am-12:15pm	
		Canoe Portage	1:00-3:00 pm	
		Lum park	3:15-5:15 pm	
	July 22 Monday	Canoe Portage	8:00-10:00 am	Weekday
		Lum park	10:15am-12:15pm	
		Green's Point access	1:00-3:00 pm	
		French Rapids access	3:15-5:15 pm	
	July 30 Tuesday	Lum park	8:00-10:00 am	Weekday
		Green's Point access	10:15am-12:15pm	
		French Rapids access	1:00-3:00 pm	
		Canoe Portage	3:15-5:15 pm	
August	August 7, 2019 Wednesday	French Rapids access	8:00-10:00 am	Weekday
		Canoe Portage	10:15am-12:15pm	
		Green's Point access	1:00-3:00 pm	
		Lum park	3:15-5:15 pm	
	August 11, 2019 Sunday	French Rapids access	8:00-10:00 am	Weekend
		Green's Point access	10:15am-12:15pm	
		Canoe Portage	1:00-3:00 pm	
		Lum park	3:15-5:15 pm	
	August 19, 2019 Monday	Lum park	8:00-10:00 am	Weekday
		Canoe Portage	10:15am-12:15pm	
		French Rapids access	1:00-3:00 pm	
		Green's Point access	3:15-5:15 pm	
	August 31, 2019 Sunday	French Rapids access	8:00-10:00 am	Weekend
		Canoe Portage	10:15am-12:15pm	
		Green's Point access	1:00-3:00 pm	
		Lum park	3:15-5:15 pm	

Month	Date	Survey Order	Time	Weekday/ Weekend/ Holiday
September	September 1, 2019 Sunday	Canoe Portage	8:00-10:00 am	Holiday Weekend (Labor Day)
		French Rapids access	10:15am-12:15pm	
		Lum park	1:00-3:00 pm	
		Green's Point access	3:15-5:15 pm	
	September 5, 2019 Thursday	Canoe Portage	8:00-10:00 am	Weekday
		Green's Point access	10:15am-12:15pm	
		French Rapids access	1:00-3:00 pm	
		Lum park	3:15-5:15 pm	
	September 14, 2019 Saturday	Lum park	8:00-10:00 am	Weekend
		French Rapids access	10:15am-12:15pm	
		Canoe Portage	1:00-3:00 pm	
		Green's Point access	3:15-5:15 pm	
	September 20, 2019 Friday	Canoe Portage	8:00-10:00 am	Weekday
		Lum park	10:15am-12:15pm	
		French Rapids access	1:00-3:00 pm	
		Green's Point access	3:15-5:15 pm	

5.0 Results and Discussion



5.1 Facility Inventory and Assessment




The following sections characterize the evaluated recreation sites and include descriptions of each site's amenities, recreation features, photographs, signage, and conditions of amenities and structures based on the worksheet and rating scale described in Section 4.1.

5.1.1 Canoe Portage

The canoe portage is owned and maintained by BPU and is located within the Project Boundary off Riverside Drive, west of the right embankment. The canoe portage allows portage access around the Project and is open 24 hours. The site access includes informative and warning signage explaining site rules, as well as asphalt and concrete trails to portage canoes. Recreational activities include shoreline fishing and canoeing/kayaking. The site offers two concrete restroom facilities, and landscaping at the site is well maintained, primarily through mowing. Facility conditions at the canoe portage site resulted in an average condition rating of '4.0 – Good' based on individual amenity ratings shown in Table 5-1.

Table 5-1 Canoe Portage Recreation Inventory and Condition Assessment

Canoe Portage Amenities	Rating/Condition	Comments
Canoe Portage/Carry In 	4 – Good	Asphalt and concrete trail for canoe portage use, a few chipped out areas of asphalt, but easily avoidable.
Site Furnishings	3 – Adequate	Canoe rack set up next to restrooms.
Signage 	3 – Adequate	Canoe portage signs visible from river, other signs near restrooms.

Canoe Portage Amenities	Rating/Condition	Comments
Restrooms 	4 – Good	Two concrete outhouses with updated fixtures inside, new paint.
Landscaping 	4 – Good	Grass is maintained via mowing, no other significant landscaping at site.
Shoreline 	4 – Good	No evidence of erosion.



5.1.2 Lum Park

Lum Park is owned and maintained by the city of Brainerd. The site is located within the Project Boundary and is accessed from NE Washington Street in northeast Brainerd. The site is open May 1 through October 31. Restrooms are closed for the season at the discretion of the city of Brainerd once freezing temperatures are possible. The site access includes signage with directions to the boat ramp, camping, and the beach, as well as warning signs for aquatic nuisance species. There is a large paved parking area for 30 truck trailers, a second parking area with 45 single parking spaces marked, and a paved pathway throughout the park. A motorized boat launch provides access to Rice Lake and the Mississippi River. Additional recreational amenities include three sets of playground equipment, two sand volleyball courts, a fishing pier, a disc golf course, a public swimming beach, and picnic facilities. Camping facilities do not






allow tent camping. Each camping space is typically about 40 feet by 55 feet in size, and has water, 30/50 amp electric hookups, Wi-Fi service, fire rings, and picnic tables.


Recreational activities provided by Lum Park include reservoir fishing, shoreline fishing, swimming, disc golfing, sand volleyball, bird watching, camping, picnicking, and boating. The site is generally well maintained and winterized as seasonal conditions indicate. The site offers men and women's bathrooms with running water, drinking fountains, and vending machines. Both small and large pavilions (four total) offer a multitude of picnic tables and grills. Facility conditions at Lum Park resulted in an average condition rating of '4.0 – Good' based on individual amenity ratings shown in Table 5-2.

Table 5-2 Lum Park Recreation Inventory and Condition Assessment

Lum Park Amenities	Rating/Condition	Comments
Playgrounds	4 – Good	Three sets of playground equipment, all in good condition.
Fishing Pier 	4 – Good	T-shaped fishing pier near beach and boat ramp.
Volleyball Courts	3 - Adequate	Two sand volleyball courts near campground.
Camping Facilities	3 - Adequate	Camper use only, no tents, open field with hook-ups, used frequently. Fire wood available.
Other Sporting Fields – Disc Golf 	4 – Good	Disc golf – newer baskets and tee boxes. Used quite a lot from observations.

Lum Park Amenities	Rating/Condition	Comments
Site Furnishings 	4 – Good	A few bike racks, lots of benches throughout and many picnic tables, in four separate pavilions.
Docks	3 – Adequate	One older dock at boat launch could use some work, close to water surface and small.
Trailer Accessible Boat Ramp 	4 – Good	Concrete planks, in a nice bay for easy loading and unloading, good approach to ramp.
Potable Water 	3 – Adequate	Drinking fountain at restroom building.
Signage 	4 – Good	Many signs throughout park.



Lum Park Amenities	Rating/Condition	Comments
Parking Spaces 	4 – Good	30 truck trailer spots, 45 single vehicle spots.
Parking Lot Surface 	4 – Good	All parking is paved, approximately 10 years old, striped, no potholes.
Restrooms 	3 – Adequate	Men and women's restrooms with running water and four stalls in each unit. Vending machine located outside. Some surfaces need to be painted.
Picnic Shelters 	4 – Good	Four pavilions, one large with 20 picnic tables, three others smaller with 10 tables each. New roofs, fresh paint on structures, concrete floors.
Turf	5 – Excellent	Lots of grass area, very well maintained by City.
Park Trees 	4 – Good	Numerous types and sizes of trees, all pruned


Lum Park Amenities	Rating/Condition	Comments
Shoreline 	4 – Good	No evidence of erosion.

5.1.3 French Rapids Access

The French Rapids access is owned and maintained by Crow Wing County and is open year-round. This site is located within the Project Boundary and can be accessed from County Road 142, near its intersection with State Highway 210 East in Oak Lake Township, approximately four miles northeast of Brainerd. The site's access point includes a motorized boat launch, directional signage leading to the motorized boat launch, a picnic area, and a maintained gravel parking area. Recreational activities include nearly 6 miles of groomed skiing and hiking trails with signs indicating routes, reservoir fishing, shoreline fishing, and boating. This site does not offer restrooms or potable water sources. Facility conditions at French Rapid Access resulted in a condition rating of '3.0 – Adequate' based on individual amenity ratings shown in Table 5-3.

Table 5-3 French Rapids Access Recreation Inventory and Condition Assessment


French Rapids Amenities	Rating/Condition	Comments
Trailer Accessible Boat Ramp 	3 – Adequate	Concrete planks, good approach to ramp.
Signage 	3 – Adequate	Two signs leading to landing, invasive species signs, ski trail signs.




Parking Spaces	2 – Marginal	Open gravel-parking area, hard to determine total parking space count.
Parking Lot Surface	2 – Marginal	Semi-maintained gravel parking area with puddles in potholes during rain events.
Turf	2 – Marginal	Trees and gravel, not a lot of turf
Shoreline 	4 – Good	No evidence of erosion.

5.1.4 Green's Point Access

Green's Point access is maintained by the MNDNR. The site is located within the Project Boundary and can be accessed from County Road 3 at the end of Executive Acres Road, approximately 10 miles northeast of the City of Brainerd. Green's Point is open year-round and the site includes signage with invasive species warnings, fishing regulations, and site information signs, as well as a paved cul-de-sac for parking. This location features a carry-in boat launch point and a shoreline fishing area. Recreational activities include reservoir and shoreline fishing, bird watching, and boating. This site does not offer restrooms or potable water sources. Facility conditions at Green's Point were given a condition rating of '3.0 – Adequate' based on individual amenity ratings shown in Table 5-4.

Table 5-4 Green's Point Access Recreation Inventory and Condition Assessment

Green's Point Amenities	Rating/Condition	Comments
Canoe Portage/Carry In 	4 – Good	Grass trail down to river for canoe carry in, with a small permanent dock.
Docks	3 – Adequate	One small permanent docking area.

Green's Point Amenities	Rating/Condition	Comments
Signage 	3 – Adequate	Public water access sign on County Road 3, good signage at parking lot.
Parking Spaces 	2 – Marginal	Cul-de-sac shaped parking lot with few spaces and no designated trailer parking. Most observed vehicles in lot were trucks with canoes on top.
Parking Lot Surface	2 – Marginal	Asphalt parking area at end of road.
Shoreline 	4 – Good	No evidence of erosion.

5.2 Recreation Use Survey

This section reports the results of the spot counts and recreation use surveys conducted at the four recreation sites. Recreational use surveys were collected from 21 users (Figure 5-1) across the eight survey days. Raw survey data is provided in Appendix D. The majority of survey responses were received from users at Lum Park, which Section 5.1 indicates has more amenities than the other three facilities.

Not all users responded to every question in the survey; as a result, some survey totals may be less than 21. Survey results were grouped into the following general categories: user characteristics, recreational activity and preference, duration and timing of visits, user concerns and perceptions, and user satisfaction and feedback.

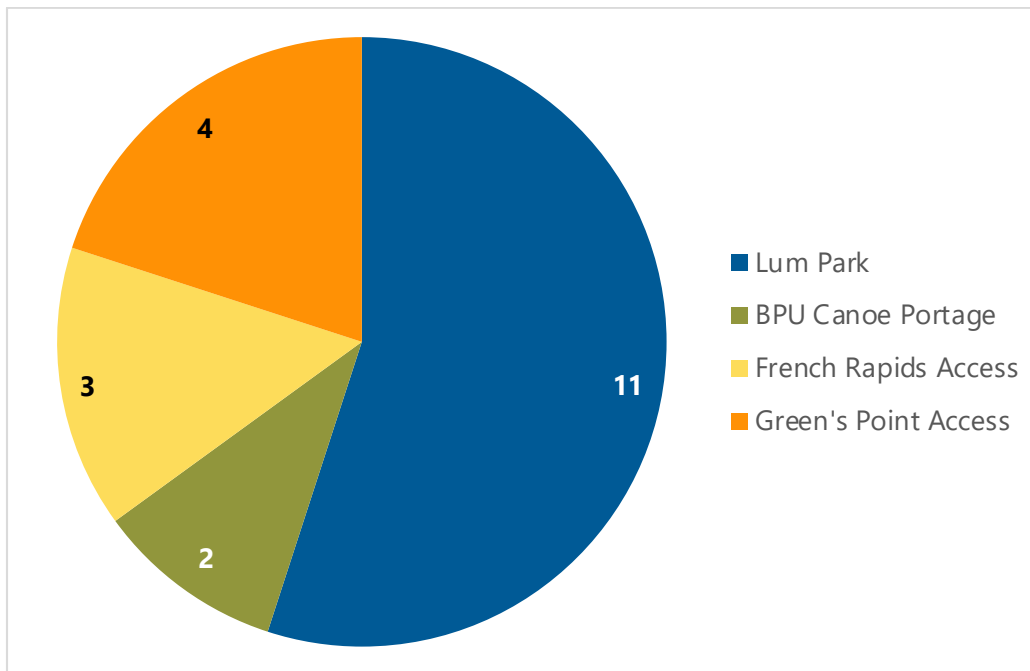


Figure 5-1 Survey Response Count by Facility

5.2.1 Use Characteristics by Location

The majority of the surveyed users visited the recreational facilities either as individuals or with one other person (Figure 5-2). Lum Park had the highest variability in group size with several groups of 3 to 5 and 6 to 10. Green's Point had the second largest group size ranging from 1 to 5, French Rapids Access had an average of 2 people per party, and the canoe portage had an average of 1 visitor per group.

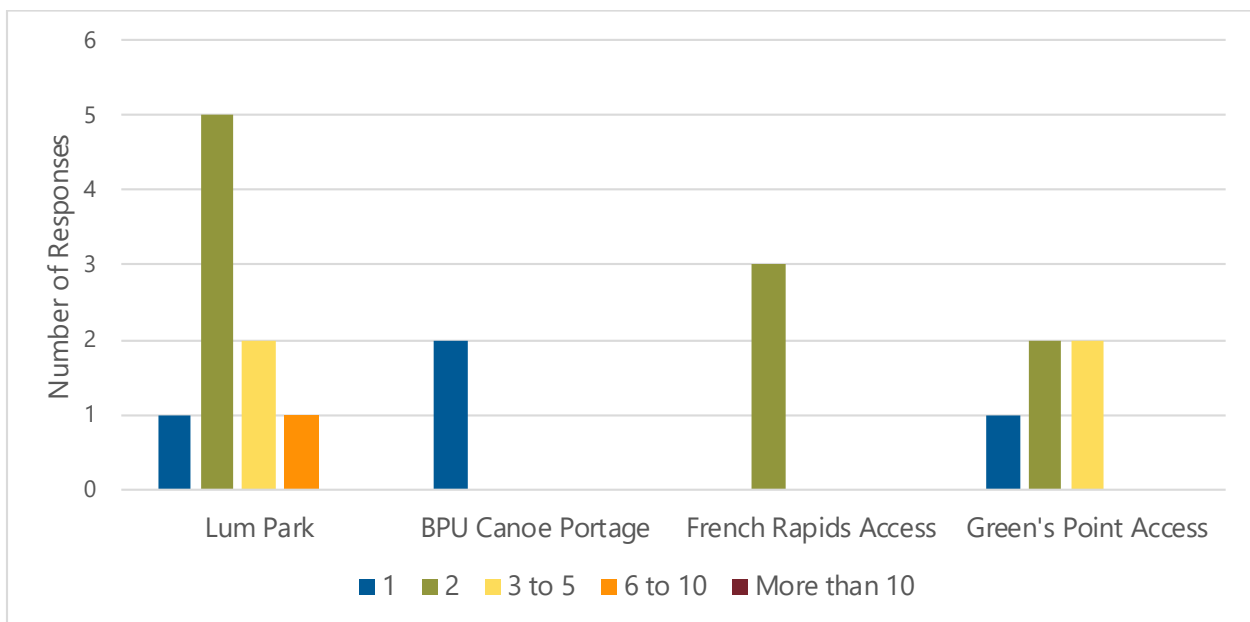


Figure 5-2 Average Surveyed Group Size by Facility

The majority of users across all surveyed locations typically arrive in a single vehicle, though responses at Lum Park, the French Rapids access, and the Green's Point access indicated occasional carpooling (Figure 5-3).

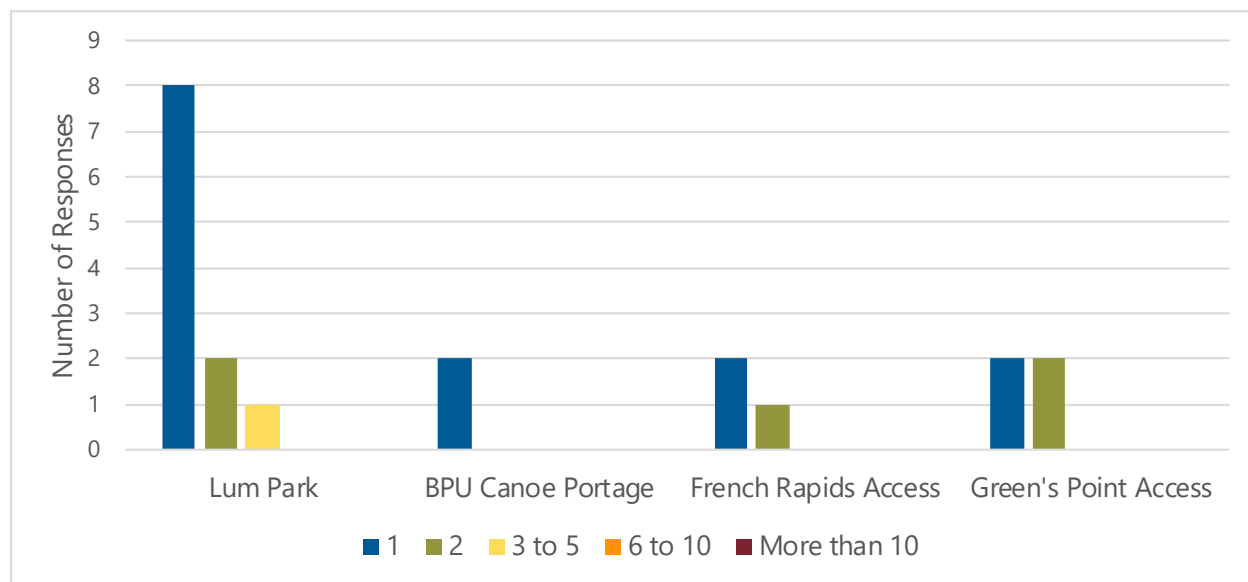


Figure 5-3 Number of Vehicles at Facility per Group of Users

To determine the frequency of use, survey participants were asked how often they visit the facility each year. Approximately 47 percent of respondents indicated that they visit the facility 1 to 3 times a year (Figure 5-4). When averaged against the number of survey respondents at a location, the French Rapids Access respondents tend to visit this location more frequently than users at the other surveyed locations, with an average response of 6-10 times a year.

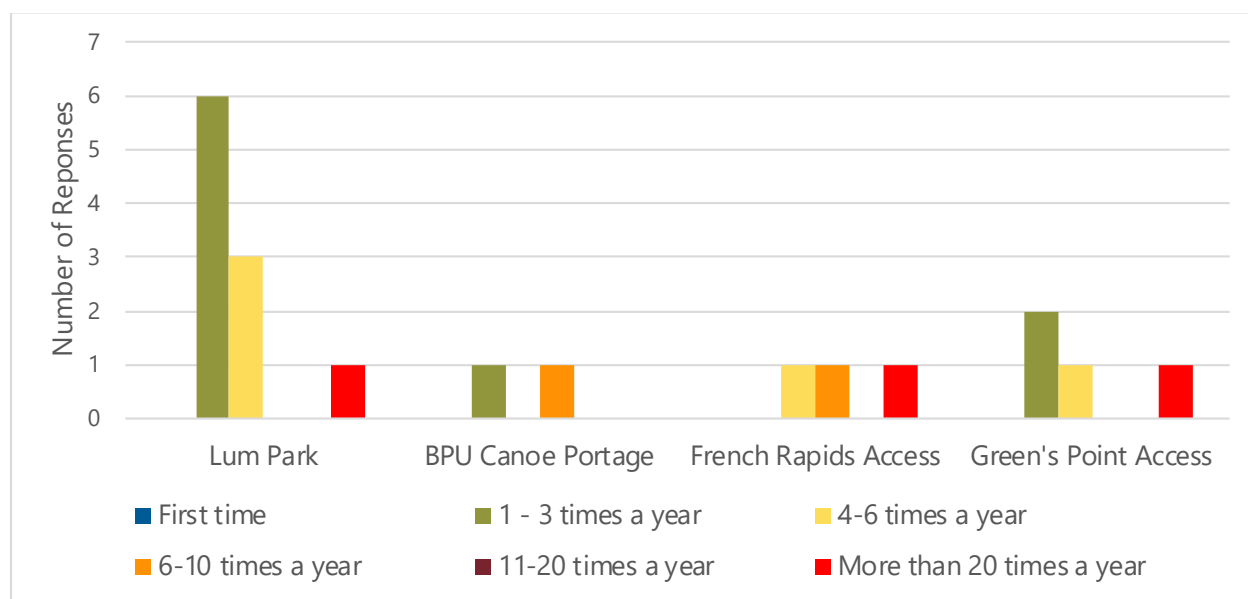


Figure 5-4 Annual Frequency of Site Visit

5.2.2 User Recreational Activity and Location Preference

The surveyed facilities offer a variety of recreational opportunities unique to each location, as described in Section 5.1. Recreational users were asked why they chose the specific facility and what activities they were there to participate in.

Lum Park users stated they primarily use the facility for fishing and boating (Figure 5-5); 53 percent of surveyed users identified fishing as their planned activity and 38 percent planned to use the facility for boating (motorized boating). In addition, one user planned to use the facility for a picnic. Fishing was noted as an intended use at all four recreation facilities, one user identified canoeing/kayaking use at the canoe portage, and one user identified they were at French Rapids access for other use. Camping, hunting, trapping, wildlife viewing, and swimming were activities included in the surveys, but were not selected by survey participants.. As such, these uses are not included in summary Figure 5-5.

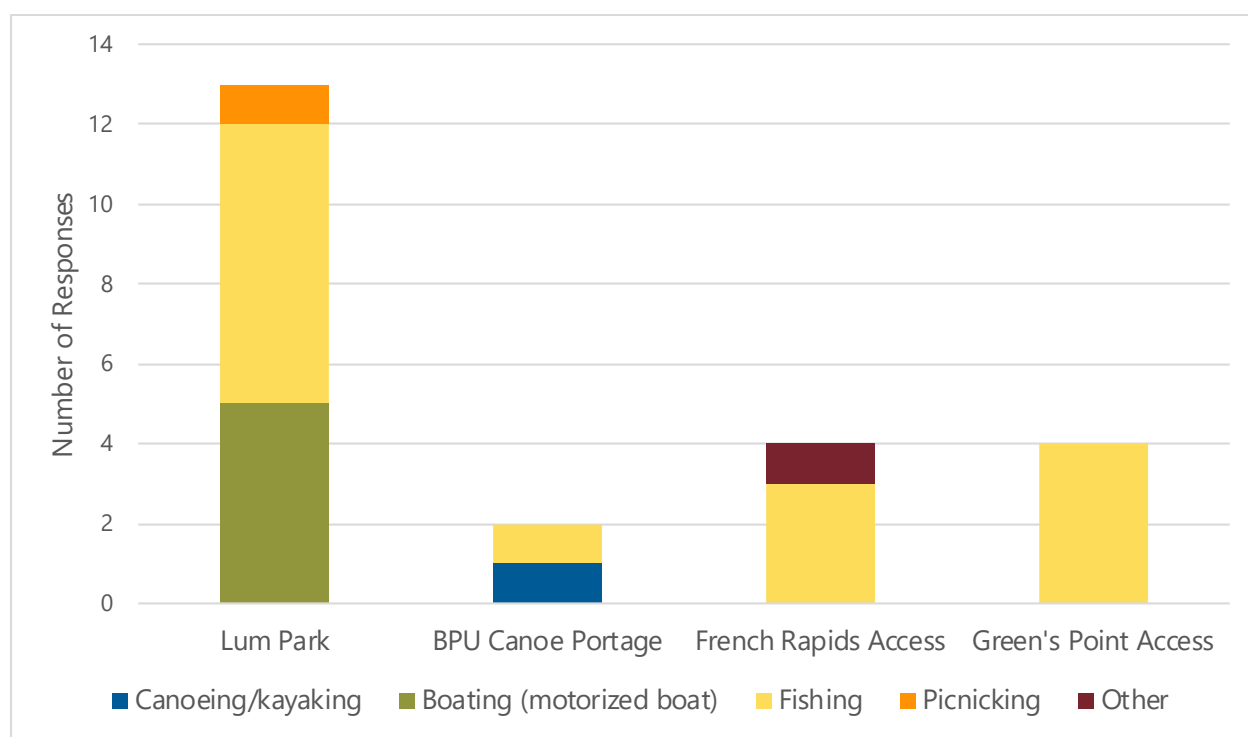


Figure 5-5 Planned Recreational Activity by Facility

All survey participants noted they choose to recreate at the specific facilities due to facility proximity to their homes. In addition, participants preferred to use Lum Park due to its available boat launch and lack of congestion. The canoe portage survey participants chose to use this facility because it has a portage. Both French Rapids access and Green's Point access users responded that they also use these facilities for fishing quality.

The surveyed facilities offer a variety of recreational amenities. Recreational users were asked which of the facility's amenities were most important to them. Nearly every survey participant, at each facility, responded that general access was important to them (Figure 5-6). Lum Park had the most variety in identified amenity importance, with participants valuing the boat launch, parking, boat dock, fishing dock,

picnic tables, and trash receptacles. This variety in identified amenity importance is likely due to Lum Park offering more recreational amenities than the other surveyed facilities. The canoe portage users valued the facility's restrooms and general access. French Rapids access and Green's Point access users valued the general accessibility of each facility, while the French Rapids access users also placed importance on the site's parking (Figure 5-6). ADA accessibility, signs and information, and lighting were amenities included in the surveys, but were not selected by survey participants. As such, these amenities are not included in summary Figure 5-6.

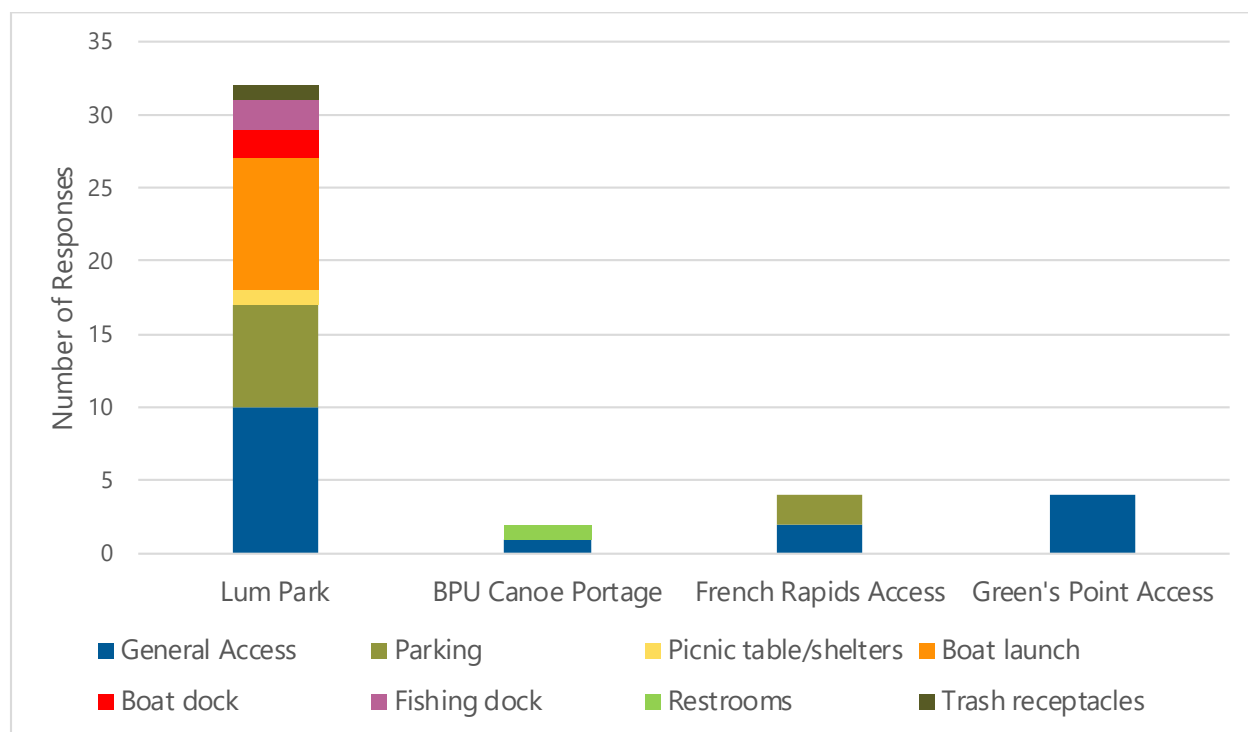


Figure 5-6 Important Facility Amenities

5.2.3 Duration and Timing of Visit

The frequency and duration of use for the surveyed facilities were fairly consistent. The majority of survey participants primarily use the parks during the summer months between June and September. Only one user noted they visit Lum Park in the spring between April and May, and one person noted they visit the Green's Point access in fall between October and November (Figure 5-7).

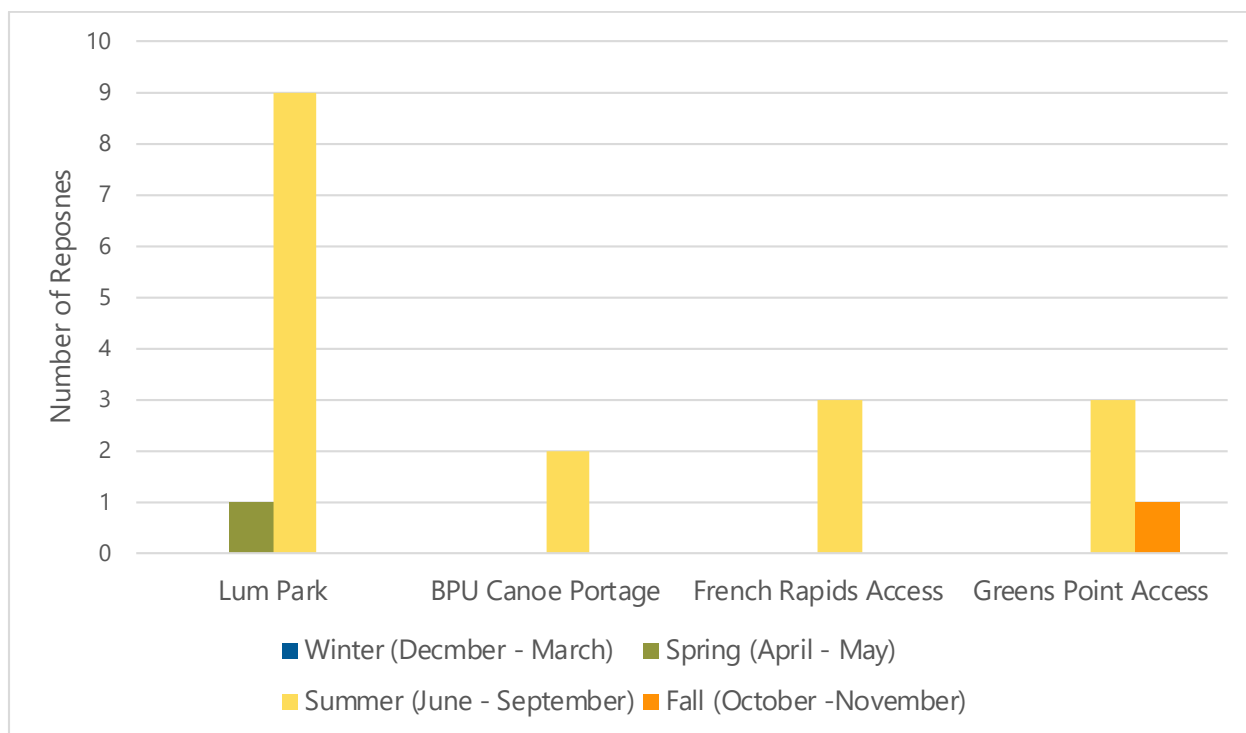


Figure 5-7 Seasonal Tendencies of Facility Use

The duration of recreational visits at each facility typically ranged between 2 to 4 hours (Figure 5-8). Two users noted they stay at the facility for more than 4 hours, with three users noting they stay at the facility for less than 2 hours.

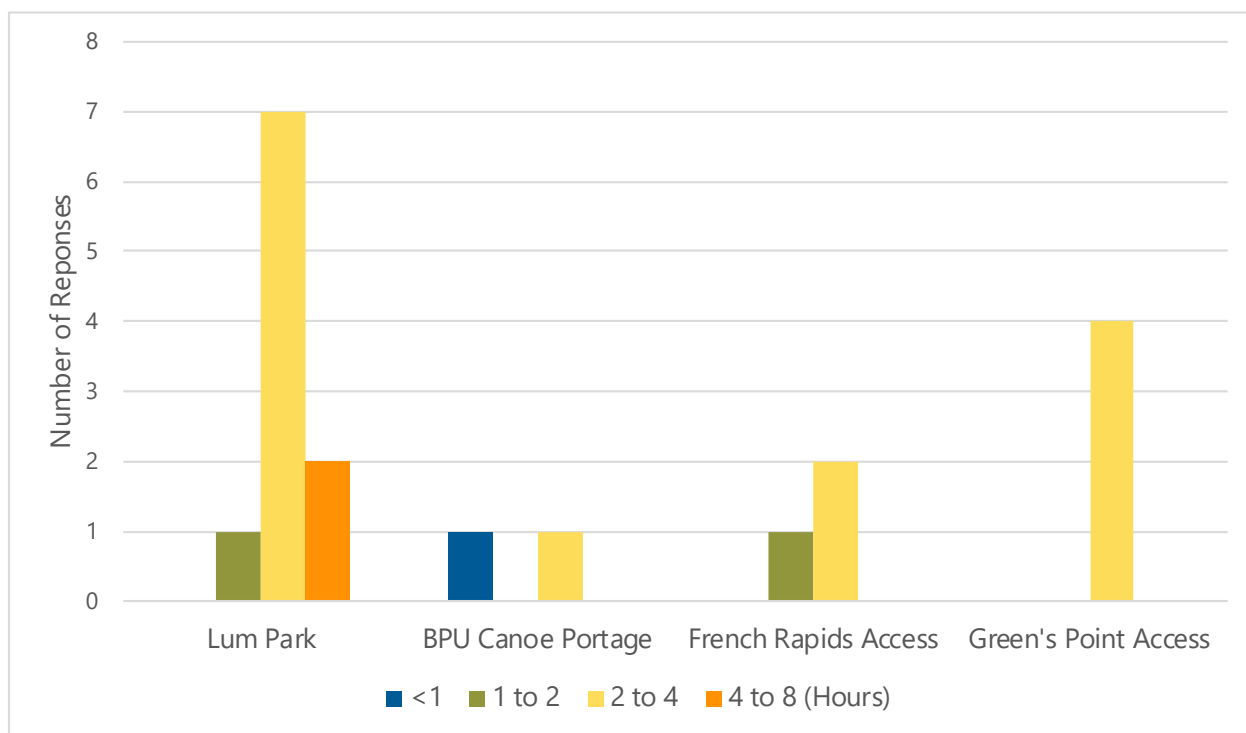


Figure 5-8 Typical Duration of Visit

5.2.4 User Capacity Perception

Overall, a majority of surveyed users perceived the facilities as not very busy (Figure 5-9) and that they preferred to recreate at these facilities because they are typically not very busy. Approximately 40 percent of Lum Park users stated the facility was moderately busy during the July 4th weekend. No users experienced any conflict with other users or recreational activities.

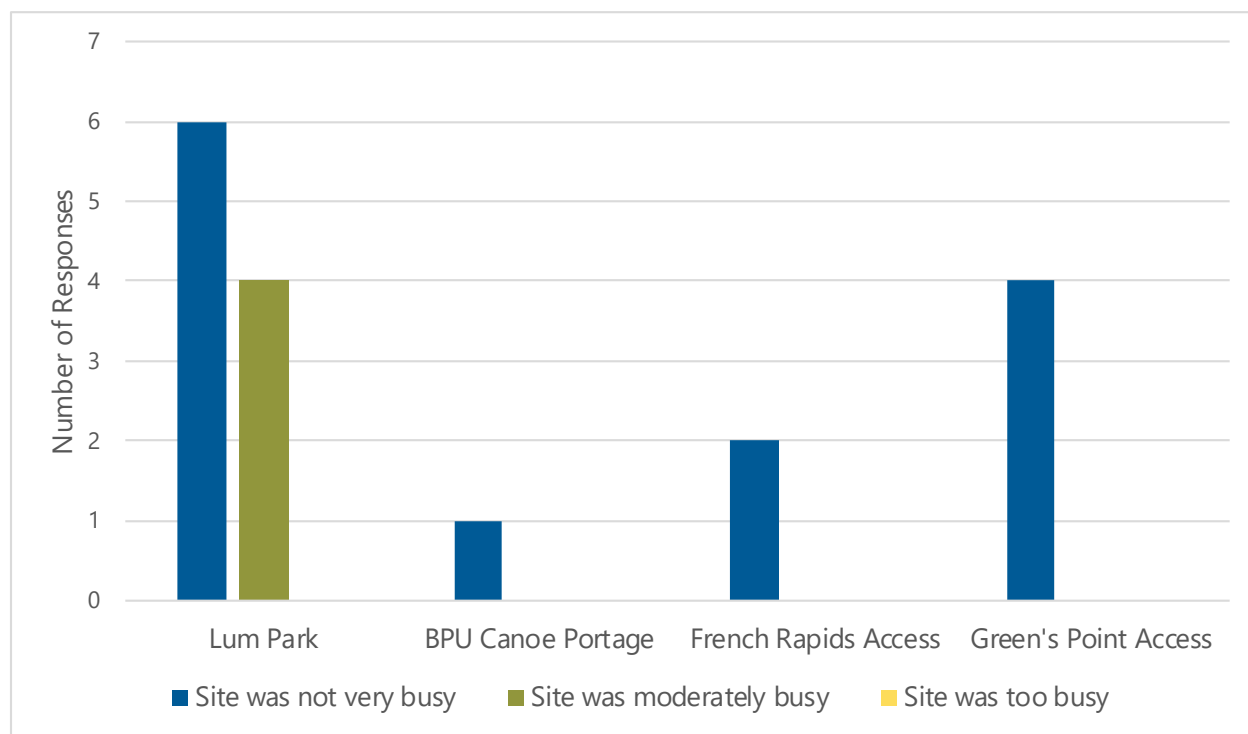


Figure 5-9 Perception of Site Capacity

5.2.5 User Satisfaction and Feedback

User satisfaction among all of the survey participants was high, with 95 percent of respondents stating that they were satisfied with the number of available recreational amenities at a given facility. One respondent indicated they were unsatisfied with Lum Park due to the length of time it took to complete a boat inspection and this recreational use questionnaire. Similarly, 95 percent of surveyed users stated that they found the overall condition of the facilities satisfactory and that they would recreate at the respective facilities again.

When prompted if there were additional recreation amenities needed at the facilities, participants stated no additions are needed. Two participants provided additional comments as part of the survey: one user of the French Rapids access noted that they liked how the park was never busy, and one user of Lum Park stated that they liked fishing at the fishing pier.

5.3 Spot Counts

Spots counts of the number of vehicles and trailers present at each facility were conducted to obtain a snapshot of use at each facility. The spot counts indicated Lum Park exhibited more use than the other facilities, presumably due to hosting more recreational amenities than the other facilities. Spots counts at

the canoe portage, French Rapids access, or Green's Point access, did not identify any vehicles or trailers (Table 5-5).

Table 5-5 Spot Counts

Date	Number of Vehicles	Number of Trailers
Lum Park		
June 21, 2019 (Weekday)	5	5
June 25, 2019 (Weekday)	2	2
June 26, 2019 (Weekday)	3	3
July 7, 2019 (Holiday Weekend)	7	7
July 8, 2019 (Weekday)	1	1
July 9, 2019 (Weekday)	0	0
July 11, 2019 (Weekday)	7	5
July 16, 2019 (Weekday)	0	0
July 19, 2019 (Weekday)	3	3
July 25, 2019 (Weekday)	1	1
July 30, 2019 (Weekday)	4	4
July 30, 2019 (Weekday)	0	0
August 7, 2019 (Weekday)	1	1
September 5, 2019 (Weekday)	3	3
September 5, 2019 (Weekday)	4	4
Canoe Portage		
June 25, 2019 (Weekday)	0	0
July 30, 2019 (Weekday)	0	0
September 5, 2019 (Weekday)	0	0
French Rapids Access		
July 7, 2019 (Holiday Weekend)	0	0
July 8, 2019 (Weekday)	0	0
July 30, 2019 (Weekday)	0	0
September 5, 2019 (Weekday)	0	0
Green's Point Access		
June 25, 2019 (Weekday)	0	0
July 8, 2019 (Weekday)	0	0

6.0 Site Recommendations

Over the course of the study period, survey respondents were asked to provide suggestions related to site improvement needs. Additionally, when performing condition assessments, field staff made notes related to visitor safety, signage, and/or potentially useful amenities at each site. The suggestions and recommendations for each site are discussed below.

6.1.1 Canoe Portage

The canoe portage is a small park-like space that provides recreational users a canoe portage to the Mississippi River, as well as on-site restrooms and opportunities for shoreline fishing. The surveyed users at the canoe portage noted they were overall satisfied with the amenities and condition of the facility. Overall, the park is in good condition, receiving an average condition score of 4.0 (Good) on a 5-point scale. Continued routine maintenance of existing site amenities is recommended; no additional amenities or non-routine maintenance are recommended based on this recreation use and inventory study.

6.1.2 Lum Park

Lum Park provides a variety of amenities to recreational users, including motorized boat access to Rice Lake and is popular with anglers for its fishing pier. Approximately 90 percent of the survey participants were satisfied with the amenities provided at this site. One user was moderately unsatisfied due to the length of time it took to complete a boat inspection and this recreational use questionnaire. Overall, the park is in good condition, receiving an average condition score of 4.0 (Good) on a 5-point scale. Continued routine maintenance of existing site amenities is recommended; no additional amenities or non-routine maintenance are recommended based on this recreation use and inventory study.

6.1.3 French Rapids Access

The French Rapids access provides motorized boat access to the Mississippi River via a paved launch. The site is primarily used for boat access and shoreline fishing. The surveyed users at French Rapids access noted they were satisfied with the amenities and condition of the facility.

BPU staff noted that parking and turf management were adequate at this facility, contributing to the site's average condition score of 3.0 (Adequate) on a 5-point scale. The current parking consists of a small gravel surface that is infrequently maintained and contains potholes resulting in puddles during rain events. Although the parking lot is appropriately sized for the amount of site use, more frequent lot surface maintenance, to minimize the presence of potholes, is recommended. The turf score for the site was marginal due to the absence of significant turf areas at this site. Given the site's primary purpose is to provide boating access, the lack of turf does not contribute significantly to site use. No additional amenities or maintenance are recommended based on this recreation use and inventory study.

6.1.4 Green's Point Access

Green's Point access provides a walk-in access for canoes and kayaks to the Mississippi River, as well as opportunities for shoreline fishing. Survey participants at the Green's Point access primarily used the site for shoreline fishing. Overall, the park's condition is adequate, receiving an average condition score of 3.0

(Adequate) on a 5-point scale. All survey participants noted they were satisfied with the amenities provided and overall condition of the site. Continued routine maintenance of existing site amenities is recommended; no additional amenities or non-routine maintenance are recommended based on this recreation use and inventory study.

7.0 References

1. **Mead & Hunt.** *Recreational Use Monitoring Plan, Brainerd Hydroelectric Project, FERC Project No. 2533.* Brainerd, Minnesota : Potlatch Corporation, May 1994.
2. **Federal Energy Regulatory Commission (FERC).** *Division of Hydropower Administration & Compliance, Compliance Handbook.* Washington : Department of Energy, 2015.
3. **Barr Engineering Co.** Revised Study Plan - Brainerd Hydroelectric Project FERC License No. 2533. December 10, 2018.

Appendix A

Facility Inventory Assessment Form

Facility Inventory Assessment - Dam Site Canoe Portage			
Date:10-14-19	Site Name:canoe Portage	Evaluator:Scott Magnuson	Facility Ownership:Brainerd Public Utilities
Directions: Please Include condition of each amenity based on the following ratings; please take photo documentation of all amenities			
1 - Poor	In poor condition: Critically damaged, needs immediate repair or replacement, past intended life use		
2 - Marginal	In marginal condition: is defective and in need of replacement, but is still in a workable condition		
3 - Adequate	In adequate condition: is moderately deteriorated, has not exceeded its intended life use, minor compliance issues		
4 - Good	In good condition: may be slightly defective, no longer new, is overall functional and in working condition		
5 - Excellent	In excellent condition: In new or like new condition, no visible defects		
Recreation Amenities			
Type	Notes/Comments (please mark N/A if not present at location)	Ratings	Photo Checklist
Playgrounds	N/A		
Fishing Pier	N/A		
Basketball Court	N/A		
Tennis Court	N/A		
Soccer Fields	N/A		
Baseball Fields	N/A		
Volleyball Courts	N/A		
Softball Fields	N/A		
Camping Facilities	N/A		
Pathways/Trails	N/A		
Canoe Portage/Carry In	tar and concrete trail for canoe portage use, a few chipped out areas of tar, but easily avoidable	4	yes
Other Sporting Fields	N/A		
Site Amenities			
Site Furnishings (benches, bike racks, picnic tables, etc.)	Canoe rack set up next to restrooms	3	yes
Docks	N/A		
Trailer Accessible Boat Ramp	N/A		
Potable Water	N/A		
Lighting	N/A		
Signage (include # of signs in notes)	canoe portage signs seen from river, other signs near restrooms	3	yes
Parking Spaces (include # of spaces in notes)	N/A		
Parking Lot Surface (paved/unpaved, condition)	N/A		
Park Structures			
Restrooms	two concrete outhouses with updated fixtures inside, new paint	4	yes
Picnic Shelters	N/A		
Recreation Center	N/A		
Natural			
Turf	N/A		
Park Trees	N/A		
Landscaping	Landscaping/turf are very well kept	4	yes
Shoreline (erosion, invasive weeds, etc.)	shoreline is in good shape	4	yes
Natural Areas			
Comments			
there is a comment card option at this site, and we receive numerous compliments on the facility			

Facility Inventory Assessment - Lum Park			
Date:10-14-19	Site Name:Lum Park	Evaluator:Scott Magnuson	Facility Ownership:City of Brainerd
Directions: Please Include condition of each amenity based on the following ratings; please take photo documentation of all amenities			
1 - Poor	In poor condition: Critically damaged, needs immediate repair or replacement, past intended life use		
2 - Marginal	In marginal condition: is defective and in need of replacement, but is still in a workable condition		
3 - Adequate	In adequate condition: is moderately deteriorated, has not exceeded its intended life use, minor compliance issues		
4 - Good	In good condition: may be slightly defective, no longer new, is overall functional and in working condition		
5 - Excellent	In excellent condition: In new or like new condition, no visible defects		
Recreation Amenities			
Type	Notes/Comments (please mark N/A if not present at location)	Ratings	Photo Checklist
Playgrounds	Three sets of playground equipment, all in good condition	4	yes
Fishing Pier	T-shaped fishing pier, in good condition, near beach and boat ramp	4	yes
Basketball Court	N/A		
Tennis Court	N/A		
Soccer Fields	N/A		
Baseball Fields	N/A		
Volleyball Courts	Two sand volleyball courts near campground, no nets at time of evaluation (Fall time)	3	yes
Softball Fields	N/A		
Camping Facilities	Camper use only, no tents, open field with hook-ups, used frequently. Fire wood available.	3	yes
Pathways/Trails	N/A - all open area throughout park		
Canoe Portage/Carry In	N/A		
Other Sporting Fields	Disc golf - newer baskets and tee boxes. Used quite a lot from observations	4	yes
Site Amenities			
Site Furnishings (benches, bike racks, picnic tables, etc.)	A few bike racks, lot's of benches throughout and lots of picnic tables, in four separate pavillions	4	yes
Docks	one older dock at boat launch, could use some work, close to water surface and fairly small	3	yes
Trailer Accessible Boat Ramp	concrete planks, in a nice bay for easy loading and unloading, good approach to ramp helps speed things up	4	yes
Potable Water	drinking fountains at restroom building	3	yes
Lighting			
Signage (include # of signs in notes)	lots of signage throughout park, to many to count. Everything is well marked.	4	yes, some
Parking Spaces (include # of spaces in notes)	30 truck trailer spots, 45 single vehicle spots	4	yes
Parking Lot Surface (paved/unpaved, condition)	all parking is paved, probably 10 years old, but striped and in very good condition, no potholes	4	yes
Park Structures			
Restrooms	mens and womens restrooms with running water, four stalls in each unit, vending machine outside. Needs some paint, but building in good s	3	yes
Picnic Shelters	four pavillions, one large with 20 picnic tables, three others smaller, 10 tables each. New roofs, fresh paint on structure, concrete floor	4	yes
Recreation Center	N/A		
Natural			
Turf	lots of grass area, very well maintained by city parks crew	5	yes
Park Trees	numerous types and size of trees, all in good shape/pruned	4	yes
Landscaping	not much extra landscaping other than grass		
Shoreline (erosion, invasive weeds, etc.)	shoreline is in good shape	4	
Natural Areas			
Comments			
There is a swimming beach at the site, about 75 feet of shoreline and 20 feet deep. Nice sand and very clean (weeds, sticks etc.) Overall, this is a very nice park with fishing facilities and boat launch. The site is very well groomed, and gets used quite frequently. Inside of the restroom building, there are showers, one in the mens and one in the womens. these are in good shape, they were moved from the "beach" building in 2006.			

Facility Inventory Assessment - FrenchRapids			
Date:10-14-19	Site Name:French Rapids	Evaluator:Scott Magnuson	Facility Ownership:Crow Wing County
Directions: Please Include condition of each amenity based on the following ratings; please take photo documentation of all amenities			
1 - Poor	In poor condition: Critically damaged, needs immediate repair or replacement, past intended life use		
2 - Marginal	In marginal condition: is defective and in need of replacement, but is still in a workable condition		
3 - Adequate	In adequate condition: is moderately deteriorated, has not exceeded its intended life use, minor compliance issues		
4 - Good	In good condition: may be slightly defective, no longer new, is overall functional and in working condition		
5 - Excellent	In excellent condition: In new or like new condition, no visible defects		
Recreation Amenities			
Type	Notes/Comments (please mark N/A if not present at location)	Ratings	Photo Checklist
Playgrounds	N/A		
Fishing Pier	N/A		
Basketball Court	N/A		
Tennis Court	N/A		
Soccer Fields	N/A		
Baseball Fields	N/A		
Volleyball Courts	N/A		
Softball Fields	N/A		
Camping Facilities	N/A		
Pathways/Trails	Trailhead for cross country ski trail		
Canoe Portage/Carry In	N/A		
Other Sporting Fields	N/A		
Site Amenities			
Site Furnishings (benches, bike racks, picnic tables, etc.)	N/A		
Docks	N/A		
Trailer Accessible Boat Ramp	concrete planks, good approach to ramp helps speed things up	3	yes
Potable Water	N/A		
Lighting	N/A		
Signage (include # of signs in notes)	two signs leading to landing, invasive species signs, ski trail signs	3	yes, some
Parking Spaces (include # of spaces in notes)	just a gravel area, hard to really determine total parking space count	2	yes
Parking Lot Surface (paved/unpaved, condition)	semi-maintained gravel parking area, puddles during rain events	2	yes
Park Structures			
Restrooms	N/A		
Picnic Shelters	N/A		
Recreation Center	N/A		
Natural			
Turf	trees and gravel, not a lot of turf	2	yes
Park Trees	N/A		
Landscaping	N/A		
Shoreline (erosion, invasive weeds, etc.)	shoreline is in good shape	4	
Natural Areas			
Comments			
not a lot of fishing activity going on at this sight, there was a fair amount of people just sitting in their cars			

Facility Inventory Assessment - Greens Point			
Date:10-14-19	Site Name:Greens Point	Evaluator:Scott Magnuson	Facility Ownership:MnDNR
Directions: Please Include condition of each amenity based on the following ratings; please take photo documentation of all amenities			
1 - Poor	In poor condition: Critically damaged, needs immediate repair or replacement, past intended life use		
2 - Marginal	In marginal condition: is defective and in need of replacement, but is still in a workable condition		
3 - Adequate	In adequate condition: is moderately deteriorated, has not exceeded its intended life use, minor compliance issues		
4 - Good	In good condition: may be slightly defective, no longer new, is overall functional and in working condition		
5 - Excellent	In excellent condition: In new or like new condition, no visible defects		
Recreation Amenities			
Type	Notes/Comments (please mark N/A if not present at location)	Ratings	Photo Checklist
Playgrounds	N/A		
Fishing Pier	N/A		
Basketball Court	N/A		
Tennis Court	N/A		
Soccer Fields	N/A		
Baseball Fields	N/A		
Volleyball Courts	N/A		
Softball Fields	N/A		
Camping Facilities	N/A		
Pathways/Trails	N/A		
Canoe Portage/Carry In	Nice grass trail down to river for canoe carry in, with a small, permanent dock	4	yes
Other Sporting Fields	N/A		
Site Amenities			
Site Furnishings (benches, bike racks, picnic tables, etc.)	N/A		
Docks	one small premanent docking area	3	yes
Trailer Accessible Boat Ramp	N/A		
Potable Water	N/A		
Lighting	N/A		
Signage (include # of signs in notes)	public water access sign on CR3, good signage at parking lot	3	yes
Parking Spaces (include # of spaces in notes)	really just a cul-de-sac, not a lot of parking, no designated trailer parking, but mostly trucks with canoes on top.	2	yes
Parking Lot Surface (paved/unpaved, condition)	tared parking area at end of road, see above	2	yes
Park Structures			
Restrooms	N/A		
Picnic Shelters	N/A		
Recreation Center	N/A		
Natural			
Turf	N/A		
Park Trees	N/A		
Landscaping	N/A		
Shoreline (erosion, invasive weeds, etc.)	shoreline is in good shape	4	yes
Natural Areas			
Comments			
I was at this site in October, saw three duck hunting parties just coming off the water, they were all satisfied with the facility			

Appendix B

Recreation Facility Inventory and Condition Assessment Photo Log

Canoe Portage



BPU Canoe Portage Photo 1: Asphalt path for canoe portage, restroom facilities, and canoe rack



BPU Canoe Portage Photo 2: General site landscaping

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



BPU Canoe Portage Photo 3: Restroom facilities and garbage can



BPU Canoe Portage Photo 4: Concrete path for canoe portage; signs showing warnings for the area

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2019 Recreation Facility Inventory and Condition Assessment Photo Log



BPU Canoe Portage Photo 5: Asphalt path for canoe portage use



BPU Canoe Portage Photo 6: Concrete path for canoe portage use and signage with site rules

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2019 Recreation Facility Inventory and Condition Assessment Photo Log



BPU Canoe Portage Photo 7: Asphalt path for canoe portage use and signage with site rules



BPU Canoe Portage Photo 8: Shoreline; buoys warning of BPU facility

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2019 Recreation Facility Inventory and Condition Assessment Photo Log



BPU Canoe Portage Photo 9: Shoreline at canoe portage with large riprap in the background

Lum Park



Lum Park Photo 1: Access signage for boat trailer parking



Lum Park Photo 2: Access signage providing direction to beach, boat ramp, and camping area

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Lum Park Photo 3: Boat trailer parking area and restroom structure



Lum Park Photo 4: Parking area for vehicles with boat trailers

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Lum Park Photo 5: Parking lot for single vehicles with nearby mature trees and picnic shelter/pavilion



Lum Park Photo 6: Large picnic shelter available for reservations; capacity for approximately 20 picnic tables

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Lum Park Photo 7: Picnic shelter with picnic tables stored for end of season



Lum Park Photo 8: Picnic shelter with picnic tables stored for end of season

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Lum Park Photo 9: Men and women's restroom facility with running water with adjacent handicap parking



Lum Park Photo 10: Restroom facilities with playground in the background and adjacent handicap parking

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Lum Park Photo 11: Potable water source



Lum Park Photo 12: Signage and disposable bags for cleaning up after pets

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Lum Park Photo 13: Sand volleyball courts with nets removed for season



Lum Park Photo 14: Bike rack with playground equipment in the background

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Lum Park Photo 15: Paved walking path adjacent to disc golfing course



Lum Park Photo 16: Landscaping with large mature trees adjacent to paved walking path

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Lum Park Photo 17: Park bench under mature trees



Lum Park Photo 18: Signage for invasive species and potential swimming hazards

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Lum Park Photo 19: Signage for aquatic and invasive species next to T-shaped pier for shoreline fishing



Lum Park Photo 20: Trailer accessible boat ramp with dock

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Lum Park Photo 21: Sandy swimming beach near dock



Lum Park Photo 22: Swimming beach and adjacent shoreline

French Rapids Access



French Rapids Access Photo 1: Signage with directions to French Rapids access



French Rapids Access Photo 2: Additional signage providing directions to French Rapids access

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



French Rapids Access Photo 3: Trailhead with site information and trail maps



French Rapids Access Photo 4: Trailer accessible boat ramp

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



French Rapids Access Photo 5: Shoreline providing canoe access next to the trailer accessible boat ramp



French Rapids Access Photo 6: Shoreline showing no signs of erosion

Green's Point Access



Green's Point Access Photo 1: Asphalt parking area at end of road, no striped/designated parking spots



Green's Point Access Photo 2: Green's Point site access signage

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Green's Point Access Photo 3: Signage at the site access for fishing regulations, exotic species alerts, aquatic nuisance species, and site use rules



Green's Point Access Photo 4: Access stairs to small permanent dock, shoreline, and trails

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Green's Point Access Photo 5: Shoreline and grass trail along shoreline



Green's Point Access Photo 6: Grass trail along the shoreline

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Green's Point Access Photo 7: Canoe portage/carry in access and trail along shoreline



Green's Point Access Photo 8: Canoe portage/carry in access point

Appendix B
2019 Recreation Facility Inventory and Condition Assessment Photo Log



Green's Point Access Photo 9: Additional canoe portage/carry in access point



Green's Point Access Photo 10: Shoreline adjacent to small permanent dock

Appendix C

Recreation Use Survey Questionnaire

Revised Study Plan
Brainerd Hydroelectric Project
FERC License No. 2533
Recreational Use Questionnaire

1. Which facility are you using today?
 - BPU Canoe portage
 - Lum Park
 - French Rapids access
 - Green's Point access
2. How many people are in your party, including you?
 - 1
 - 2
 - 3-5
 - 6-10
 - More than 10
3. How many vehicles did your group come with?
 - 1
 - 2
 - 3-5
 - 6-10
 - More than 10
4. How often do you visit this facility?
 - First time
 - 1-3 times a year
 - 4-6 times a year
 - 6-10 times a year
 - 11-20 times a year
 - More than 20 times a year
5. What type of recreation activity(ies) do you plan to/did you participate in today?
 - Canoeing/kayaking
 - Boating (motorized boat)
 - Camping
 - Fishing
 - Hunting
 - Trapping
 - Wildlife viewing
 - Swimming

- Picnicking
 - Other _____
6. Why did you choose to come to this recreation site versus another recreation site today?
- (open-ended response)
7. When you come here, how long do you usually stay (hours)
- <1 hour
 - 1-2 hours
 - 2-4 hours
 - 4-8 hours
 - >8 hours
8. What time of year do you typically come here?
- Winter (December – March)
 - Spring (April – May)
 - Summer (June – September)
 - Fall (October – November)
9. Did you experience any difficulty accessing the resources you were hoping to access when you came here today?
- Yes
 - No
10. During your visit to this site today, what was your perception on the amount of use occurring?
- Site was not very busy
 - Site was moderately busy
 - Site was too busy
11. During your visit to this site today, did you experience any conflict with other recreational activities or visitors?
- Yes (please explain)
 - No
12. What amenities are most important to you when recreating at this site (choose all that apply)?
- General access
 - ADA accessibility
 - Parking
 - Signs and information
 - Picnic table/shelters
 - Boat launch

- Boat dock
- Fishing dock
- Lighting
- Restrooms
- Trails
- Trash receptacles

13. Overall, how satisfied were you with the number of available recreational amenities at this facility?

- Satisfied
- Moderately satisfied
- Neither satisfied nor unsatisfied
- Moderately unsatisfied
- Unsatisfied (explain why)

14. Overall, how would you rate the overall condition of this recreation site?

- Satisfactory
- Moderately satisfactory
- Neither satisfactory nor unsatisfactory
- Moderately unsatisfactory
- Unsatisfactory (explain why)

15. Are there any additional recreation amenities needed at this recreation site?

- Yes (write-in what)
- No

16. Would you recreate at this site again in the future?

- Yes
- No

17. Any additional comments or suggestions?

Appendix D

Recreational Use Survey Raw Data

Weather Conditions	Which facility are you using today?	How many people are in your party, including you?	How many vehicles did your group come with?	How often do you visit this facility?	What type of recreation activity(ies) do you plan to/did you participate in today?	If Other, please explain.	Why did you choose to come to this recreation site versus another recreation site today?	When you come here, how long do you usually stay (hours)?	What time of year do you typically come here?	Did you experience any difficulty accessing the resources you were hoping to access when you came here today?	If Yes, please explain.	During your visit to this site today, what was your perception on the amount of use occurring?	During your visit to this site today, did you experience any conflict with other recreational activities or visitors?	What amenities are most important to you when recreating at this site (choose all that apply)?	Overall, how satisfied were you with the number of available recreational amenities at this facility?	If Unsatisfied, please explain why.	Overall, how would you rate the overall condition of this recreation site?	If Unsatisfied, please explain why.	Are there any additional recreation amenities	If Yes, write-in what.	Would you recreate at this site again in the future?	Any additional comments or suggestions?	CreationDate	
clear, sunny, calm	BPU Canoe portage	1	1	6-10 times a year	Fishing		close to home	2-4 hours	Summer (June – September)	No		Site was not very busy	No	General_access	Satisfied		Satisfactory		No		Yes		5/30/2019 16:34	
	BPU Canoe portage	1	1	1-3 times a year	Canoeing_kayaking		portage	<1 hour	Summer (June – September)	No		Site was not very busy	No	General_access,Restrooms	Satisfied		Satisfactory		No		Yes		6/4/2019 16:48	
	BPU Canoe portage				Other	nobody here				No		Site was not very busy	No										6/25/2019 18:33	
	BPU Canoe portage																						7/7/2019 14:29	
	BPU Canoe portage																						7/30/2019 13:29	
	BPU Canoe portage																						9/5/2019 13:30	
	French Rapids access	2	1	6-10 times a year	Fishing		like fish off shore	2-4 hours	Summer (June – September)	No		Site was not very busy	No	General_access,Parking	Satisfied		Satisfactory		No	we like it somewhat primitive	Yes			5/26/2019 13:32
	French Rapids access	2	1	4-6 times a year	Fishing		to fish off shore, close to home	2-4 hours	Summer (June – September)	No		Site was not very busy	No	General_access	Satisfied		Satisfactory		No		Yes	like the fact its never busy		5/30/2019 13:16
	French Rapids access																						7/7/2019 15:51	
	French Rapids access																						7/8/2019 18:28	
	French Rapids access																						7/30/2019 15:42	
	French Rapids access																						9/5/2019 17:14	
overcast	French Rapids access	2	2	More than 20 times a year		these guys are here for sex ll guys on guys	evidently for sex	1-2 hours	Summer (June – September)	No		Site was not very busy	No	Parking	Satisfied		Satisfactory		No		Yes	Im done doing surveys at this location. Beautiful access taken over by gays, and people are either scared or too embarrassed to use this landing. its not being utilized for anything else.		9/5/2019 17:35
	Green's Point access	2	2	More than 20 times a year	Fishing		close to home	2-4 hours	Summer (June – September)	No		Site was not very busy	No	General_access	Satisfied		Satisfactory		No		Yes			5/28/2019 20:24
	Green's Point access	3-5	2		Canoeing_kayaking	with notes in them. out																never made contact with them		5/28/2019 20:46
	Green's Point access	1	1	1-3 times a year	Fishing		shore fishing	2-4 hours	Summer (June – September)	No		Site was not very busy	No	General_access	Satisfied		Satisfactory		No		Yes			6/6/2019 18:15
	Green's Point access																						6/25/2019 18:04	
sunny and calm	Green's Point access	2	2	1-3 times a year	Fishing	shore fishing	close to home and usually good fishing	2-4 hours	Summer (June – September)	No		Site was not very busy	No	General_access	Satisfied		Satisfactory		No		Yes			7/7/2019 16:10
	Green's Point access																						7/8/2019 18:50	
overcast	Green's Point access	3-5	1	4-6 times a year	Fishing			2-4 hours	Fall (October – November)	No		Site was not very busy	No	General_access	Satisfied		Satisfactory		No		Yes			9/5/2019 15:41
	Lum Park	2	1	1-3 times a year	Fishing		other lake accesses are always too busy . not so here	2-4 hours	Summer (June – September)	No		Site was not very busy	No	General_access,Parking,Boat_launch,Boat_dock,Trash_receptacles	Satisfied		Satisfactory		No		Yes			5/26/2019 15:35
sunny 60 deg	Lum Park	3-5	1	1-3 times a year	Boating_motorized_boat,Fishing		close to home	4-8 hours	Summer (June – September)	No		Site was not very busy	No	General_access,Parking,Boat_launch	Satisfied		Satisfactory		No		Yes			5/26/2019 15:38
	Lum Park	1	1	1-3 times a year	Boating_motorized_boat		to try boat out for the first time this year. not busy here	1-2 hours	Spring (April – May)	No		Site was not very busy	No	General_access,Boat_launch,Boat_dock,Parking	Satisfied		Satisfactory		No		Yes			5/26/2019 15:41
	Lum Park																					one car and boat trailer never talked to them		5/28/2019 20:47
	Lum Park	2	1	More than 20 times a year	Fishing		close to home	2-4 hours	Summer (June – September)	No		Site was not very busy	No	General_access,Fishing_dock	Satisfied		Satisfactory		No		Yes			5/28/2019 20:57
sunny,calm	Lum Park		2		Boating_motorized_boat,Fishing, Other	two trucks with trailers in parking lot , never talked to them																	5/30/2019 15:16	
sunny, calm	z	2	1	4-6 times a year	Fishing,Picnicking		close to home	2-4 hours	Summer (June – September)	No		Site was not very busy	No	General_access,Parking,Picnic_table_shelters,Fishing_dock	Satisfied		Satisfactory		No		z	fishing off fishing pier		5/30/2019 16:03
	Lum Park				Boating_motorized_boat,Other	spot check two trucks with boat trailers, appear to be fisherman????																	6/6/2019 18:38	
	Lum Park																						6/21/2019 15:22	
	Lum Park																						6/25/2019 18:22	
	Lum Park																						6/26/2019 18:48	
	Lum Park																						7/7/2019 14:45	
	Lum Park	2	1	4-6 times a year	Fishing		close to home and a good access	4-8 hours	Summer (June – September)	No		Site was moderately busy	No	General_access,Parking,Boat_launch	Satisfied		Satisfactory		No		Yes			7/7/2019 14:49
sunny calm	Lum Park	3-5	1	1-3 times a year	Fishing		location close to home	2-4 hours	Summer (June – September)	No		Site was moderately busy	No	General_access,Boat_launch	Moderately unsatisfied	weed inspectors take up time and now you asking questions too not happy	Satisfactory		No		No	not if continually bothered with questions just want to go fishing		7/7/2019 14:58
3 degrees sunny and calm	Lum Park	6-10	3-5	1-3 times a year	Boating_motorized_boat	pontoon ride	usually not busy	2-4 hours	Summer (June – September)	No		Site was moderately busy	No	General_access,Boat_launch	Satisfied		Moderately satisfactory		No		Yes			7/7/2019 15:32
sunny and calm	Lum Park	3-5	2	1-3 times a year	Boating_motorized_boat	potoon ride family get together weekend	close to home	2-4 hours	Summer (June – September)	No		Site was moderately busy	No	General_access,Parking,Boat_launch	Satisfied		Satisfactory		No		Yes			7/7/2019 15:35
	Lum Park																						7/8/2019 18:17	
	Lum Park																						7/9/2019 18:31	
	Lum Park																						7/11/2019 18:47	
	Lum Park																						7/16/2019 18:49	
	Lum Park																						7/19/2019 18:57	
	Lum Park																						7/25/2019 18:08	
	Lum Park																						7/30/2019 14:58	
calm\sunny	Lum Park	2	1	4-6 times a year	Fishing		good fishing	2-4 hours	Summer (June – September)	No		Site was not very busy	No	Boat_launch,Parking,Boat_dock	Satisfied		Satisfactory		No		Yes			7/30/2019 15:02
	Lum Park																						7/30/2019 16:34	
	Lum Park																						8/7/2019 15:41	
	Lum Park																						9/5/2019 11:29	
	Lum Park																						9/5/2019 17:35	

Federal Agencies

Advisory Council on Historic Preservation

John M. Fowler, Executive Director
Old Post Office Building
1100 Pennsylvania Ave NW Suite 803
Washington DC 20004
jfowler@achp.gov

U.S. Bureau of Indian Affairs

Diane Rosen, Director, Midwest Regional Office
5600 American Boulevard West Suite 500
Bloomington MN 55437-1274
diane.rosen@bia.gov

Federal Emergency MGMT Agency

Brock Long, Administrator
500 C Street SW
Washington DC 20472
brock.long@fema.dhs.gov

Federal Energy Regulatory Commission

John Zygaj, Regional Engineer
Division of Dam Safety and Inspections
230 South Dearborn Street Room 3130
Chicago IL 60604
john.zygaj@ferc.gov

Federal Energy Regulatory Commission

Patrick C. Ely, Fisheries Biologist
Office of Energy Projects
Division of Hydropower Licensing
888 First Street, NE
Washington DC 20426
patrick.ely@ferc.gov

Federal Energy Regulatory Commission

Shana Wiseman
Office of Energy Projects
Division of Hydropower Licensing
shana.wiseman@ferc.gov

National Oceanic and Atmospheric Administration

Fisheries Regional Office
Michael Pentony, Regional Administrator
55 Great Republic Drive
Gloucester MA 01930-2298
michael.pentony@noaa.gov

U.S. National Park Service

Randy Thoreson, Recreation Planner
111 East Kellogg Blvd Suite 105
St Paul MN 55101
randy_thoreson@nps.gov

U.S. Senator

Office of Senator Smith
309 Hart Senate Office Building
Washington DC 20510
No email address available

U.S. Senator

Office of Senator Klobuchar
309 Hart Senate Office Building
Washington DC 20510
No email address available

U.S. Army Corps of Engineers, St. Paul District

Robert K. Edstrom, Project Manager
190 5th St. East
St. Paul MN 55101-1638
robert.k.edstrom@usace.army.mil

U.S. Bureau of Land Management, Eastern States State Office

Mitchell Leverette, Acting State Director
20 M Street SE Suite 950
Washington DC 20003
blm_es_inquiries@blm.gov

U.S. Bureau of Reclamation

Brenda Burman, Commissioner
U.S. Department of the Interior
1849 C Street NW
Washington DC 20240-0001
bburman@usbr.gov

U.S. Coast Guard

CAPT. Mary Ellen Durley
Chief Office of Navigation Systems
2703 Martin Luther King Jr. Ave SE
Washington DC 20593-7000
maryellen.j.curley@uscg.mil

U.S. Department of Agriculture - Forest Service

Kathleen Atkinson, Regional Forester
626 East Wisconsin Avenue
Milwaukee WI 53202
katkinson@fs.fed.us

U.S. Department of Commerce

Wilbur Ross, Secretary
Office of the Secretary
1401 Constitution Avenue NW
Washington DC 20230
WLRoss@doc.gov

**U.S. Environmental Protection Agency,
Region 5**

Jen (Blonn) Tyler
Office of Enforcement and Compliance Assurance
77 West Jackson Boulevard
Chicago IL 60604-3590
Tyler.Jennifer@epa.gov

U.S. Fish and Wildlife Service

Nick Utrup, Fisheries Biologist
4101 American Boulevard
Bloomington MN 55425-1638
nick.utrup@fws.gov

United States Geological Survey

Leon Carl, Regional Director
1451 Green Road
Ann Arbor MI 48105
lcarl@usgs.gov

Non-Government Organizations

American Canoe Association

Wade Blackwood, Executive Director
1340 Central Blvd Suite 210
Fredericksburg VA 22401
wblackwood@americancanoe.org

American Rivers

William Robert Irvin, President
1101 14th St. NW Suite 1400
Washington DC 20005-5637
birvin@americanrivers.org

Hydropower Reform Coalition

National Coordinator
1101 14th St. NW Suite 1400
Washington DC 20005-5637
coordinator@hydroreform.org

Trout Unlimited

Robert J Masonis;
Chris Wood, President/ Chief Executive Officer
1777 N. Kent Street Suite 100
Arlington, VA 22209
rmasonis@tu.org
cwood@tu.org

State Agencies

Minnesota Department of Natural Resources

Charlotte Cohn, Hydropower Projects Planner
500 Lafayette Road
Eco Resources - Box 25
St. Paul MN 55155-4025
charlotte.cohn@state.mn.us

Minnesota Pollution Control Agency - North Central Region

Bonnie Finnerty,
Seth Goreham
7678 College Road, Suite 105
Baxter, MN 56425
bonnie.finnerty@state.mn.us
seth.goreham@state.mn.us

Minnesota Historical Society

Sarah J. Beimers, SHPO
50 Sherburne Avenue
St. Paul MN 55155
sarah.beimers@mnhs.org

Minnesota Public Utilities Commission

Daniel P. Wolf, Executive Secretary
121 7th Pl. East Suite 350
St. Paul MN 55101-2163
dan.wolf@state.mn.us

Office of the Attorney General

Keith Ellison
445 Minnesota Street
Suite 1400
St. Paul MN 55101-2131
attorney.general@ag.state.mn.us

Office of the Governor

Governor Tim Walz
130 State Capitol
75 Rev. Dr. Martin Luther King Jr. Boulevard
St. Paul MN 55155
tim.walz@state.mn.us

Minnesota Geological Survey

Harvey Thorleifson, Director, Midwest Regional Office
2609 West Territorial Road
St. Paul MN 55114-1032
thorleif@umn.edu

Minnesota Board of Water & Soil Resources

John Jaschke, Executive Director
520 Lafayette Road North
St. Paul MN 55155-0001
john.jaschke@state.mn.us

Minnesota Indian Affairs Council

Dennis Olson Jr., Executive Director
161 St. Anthony Ave Suite 919
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dennis.w.olson@state.mn.us

Local Government

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Paul Sandy, City Engineer
501 Laurel Street
Brainerd, MN 56401
psandy@ci.brainerd.mn.us

City of Baxter

13190 Memorywood Drive
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cityhall@baxtermn.gov

Crow Wing County Government

Timothy Houle, County Administrator
326 Laurel St. Suite 13
Brainerd, MN 56401
coadmin@crowwing.us

Crow Wing Soil & Water Conservation District

Melissa Barrick, Manager
322 Laurel St. #22
Brainerd, MN 56401
melissa.barrick@crowwingswcd.org

Township of Center

Linda McCabe, Chairwomen
22894 Antler Road
Merrfield, MN 56465
No email address available

Township of Irondale

19121 County Road 12
Ironton, MN 56455
irondaletownship2@gmail.com

Township of Oak Lawn

Sharon Pike, Supervisor Chair
P.O. Box 333
Brainerd, MN 56401
pike@brainerd.net

Township of West Crow Wing

Greg Smith, Chairman
6930 Cuyuna Avenue
crowwingtownship@gmail.com

Native American Tribes

Bois Forte Band of Chippewa

Bill Latady, Tribal Historic Preservation Officer
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Nett Lake MN 59772
blatady@boisforte-nsn.gov

Cheyenne & Arapaho Tribes

Virginia Richey, THPO
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Concho OK 73022
vrichey@c-a-tribes.org

Fond du Lac Reservation Business Committee

Kevin R. Dupuis, Chairman
1720 Big Lake Road
Cloquet MN 55720
kevindupuis@fdlrez.com

Grand Portage Reservation Tribal Council

Norman Deschampe, Chairman
P.O. Box 428
Grand Portage MN 55605
maryanng@grandportage.com

Leech Lake Historic Preservation Office

Amy Burnette, Tribal Historic Preservation Officer
190 Sailstar Drive NE
Cass Lake MN 56633
amy.burnette@llojibwe.org

Lower Sioux Indian Community of Minnesota

Cheyenne St. John, Tribal Historic Preservation Officer/ Historic Site Mgr.
39527 Reservation Highway 1
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Mille Lacs Band of Ojibwe Indians

Natalie Weyaus, Tribal Historic Preservation Officer
43408 Oodena Drive
Onamia MN 56359
natalie.weyaus@millelacsband.com

Minnesota Chippewa Tribe

Michael Northbird, GAP Coordinator
P.O. Box 217
Cass Lake MN 56633
mnorthbird@mnchippewatribe.org

Otoe-Missouria Tribal Council

John R. Shotton, Chairman
8151 Highway 177
Red Rock OK 74651-0348
jshotton@omtribe.org

Otoe-Missouria Tribe of Oklahoma

Elsie Whitehorn, THPO
8151 Highway 177
Red Rock OK 74651-0348
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Prairie Island Indian Community of Minnesota

Noah White, Tribal Historic Preservation Officer
5636 Sturgeon Lake Road
Welch MN 55089
Noah.white@piic.org

Red Lake Band of Chippewa Indians of Minnesota

Kade Farris
PO Box 274
Red Lake MN 56671
kade.ferris@redlakenation.org

Red Lake Nation Government Center

Darrell G. Seki, Sr., Chairman
15484 Migizi Drive
Red Lake MN 56671
No email address available

Santee Sioux Tribal Council

Roger Trudell, Chairman
425 Frazier Ave. N. Ste 2
Niobrara NE 68760-7219
rtrudell@santeedakota.org

Santee Sioux Tribal Nation

Ryan Kills-a-Hundred
425 Frazier Ave. N. Ste 2
Niobrara NE 68760-7219
ryan.killsahundred@fsst.org

Shakopee Mdewakanton Sioux Community of Minnesota

Bill Rudnicki, Tribal Administrator
2330 Sioux Trail NW
Prior Lake MN 55372
bill.rudnicki@shakopeedakota.org

Shakopee Mdewakanton Sioux Community of Minnesota

Leonard Wabasha, Director Cultural Resources
2300 Tiwahe Circle
Shakopee, Minnesota 55379
culturalresources@shakopeedakota.org

Upper Sioux Community of Minnesota

Samantha Odegard, THPO
Kevin Jensvold
P.O. Box 147
Granite Falls MN 56241-0147
SamanthaO@uppersiouxcommunity-nsn.gov
kevindupuis@fdlrez.com
merijok@uppersiouxcommunity-nsn.gov

White Earth Nation

Terrence Tibbetts, Chairman
P.O. Box 418
White Earth MN 56591
monica.hedstrom@whiteearth-nsn.gov

White Earth Nation of Minnesota Chippewa

Jamie Arsenault, THPO
P.O. Box 418
White Earth MN 56591
jamie.arsenault@whiteearth.com

July 9, 2021

Cliff Bentley
MLSCP Federal Consistency Coordinator
1568 Highway 2
Two Harbors, MN 55616
Cliff.bentley@state.mn.us

Re: Federal Consistency Determination, Brainerd Hydroelectric Project, FERC Project No. 2533

Dear Mr. Bentley:

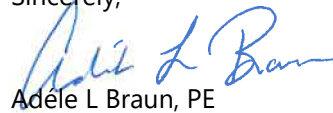
Brainerd Public Utilities (BPU) owns and operates the Brainerd Hydroelectric Project (Project), Federal Energy Regulatory Commission (FERC) Project No. 2533. The Project is in Crow Wing County, Minnesota, on the Mississippi River in the City of Brainerd, Minnesota. The Project is located approximately 120 miles southeast of Duluth, Minnesota.

The Project is currently operating under a license that was issued by the FERC on February 28, 1993. That license is set to expire on February 28, 2023. BPU filed an application for a new license with the FERC on February 26, 2021. Under section 307(c)(3)(A) of the Coastal Zone Management Act (CZMA), 16 USC section 1456(3)(A), the FERC cannot issue a license for a project within or affecting a state's coastal zone unless the Coastal Zone Management agency concurs with the license applicant's certification of consistency with the state's CZMA program.

It is our understanding that the Project is not within the coastal boundary in Minnesota; and therefore, the Project is exempt from Coastal Program federal consistency requirements by virtue of its location outside of the coastal area and the watershed of Lake Superior. We are requesting a letter from your office regarding the affect the Project will have on Minnesota's designated coastal zone. We are also requesting guidance on what steps (if any) need to be taken to comply with the state's CZMA program.

If you require additional information, please contact me by phone at 952-842-3703 or by email at abraun@barr.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Adele L. Braun".

Adele L Braun, PE
Project Manager

Cc: Secretary, FERC via e-Filing
Scott Magnuson, BPU



July 15, 2021

Adèle L Braun, PE
Project Manager
Barr Engineering Co.
4300 Market Pointe Drive, Suite 200
Minneapolis, MN 55435

Dear Ms. Braun,

Federal Consistency Determination, Brainerd Hydroelectric Project, FERC Project No. 2533, Crow Wing County

Thank you for notifying Minnesota's Lake Superior Coastal Program (MLSCP) of the above referenced project. You have requested advice as to whether or not the proposed project will affect the Lake Superior Coastal Area. The proposed project, located in Crow Wing County on the Mississippi River in the City of Brainerd (approximately 120 miles southeast of Duluth, Minnesota), and the request for a consistency determination was described in your email submitted to our office for review dated July 9, 2021.

Minnesota DNR's Lake Superior Coastal Program is the lead coastal agency pursuant to section 306(c) of the federal Coastal Zone Management Act (16 U.S.C., section 1456(c)), and is responsible for making federal consistency determinations in Minnesota. Federal consistency is the CZMA requirement that federal actions that affect any land or water use or natural resource of the Lake Superior Coastal Area be consistent to the maximum extent practicable with the enforceable policies of the Lake Superior Coastal Program.

The Lake Superior Coastal Area boundary follows the nearest legal township along the shore, or approximately six miles inland from Lake Superior. Since the Brainerd Hydroelectric Project is located outside of the coastal area and the watershed of Lake Superior, it is exempt from Coastal Program federal consistency requirements.

Therefore, MLSCP hereby notifies Brainerd Public Utilities (BPU) and FERC that the proposed Brainerd Hydroelectric Project is consistent with MLSCP. Please note that consistency with MLSCP does not exempt the project from any other state of Minnesota FERC relicensing requirements, including state environmental review.

Sincerely,

Cliff Bentley
MLSCP Federal Consistency Coordinator
(218) 834-1441
cliff.bentley@state.mn.us



Appendix D

Exhibit E – Environmental Report Attachments (CEII)

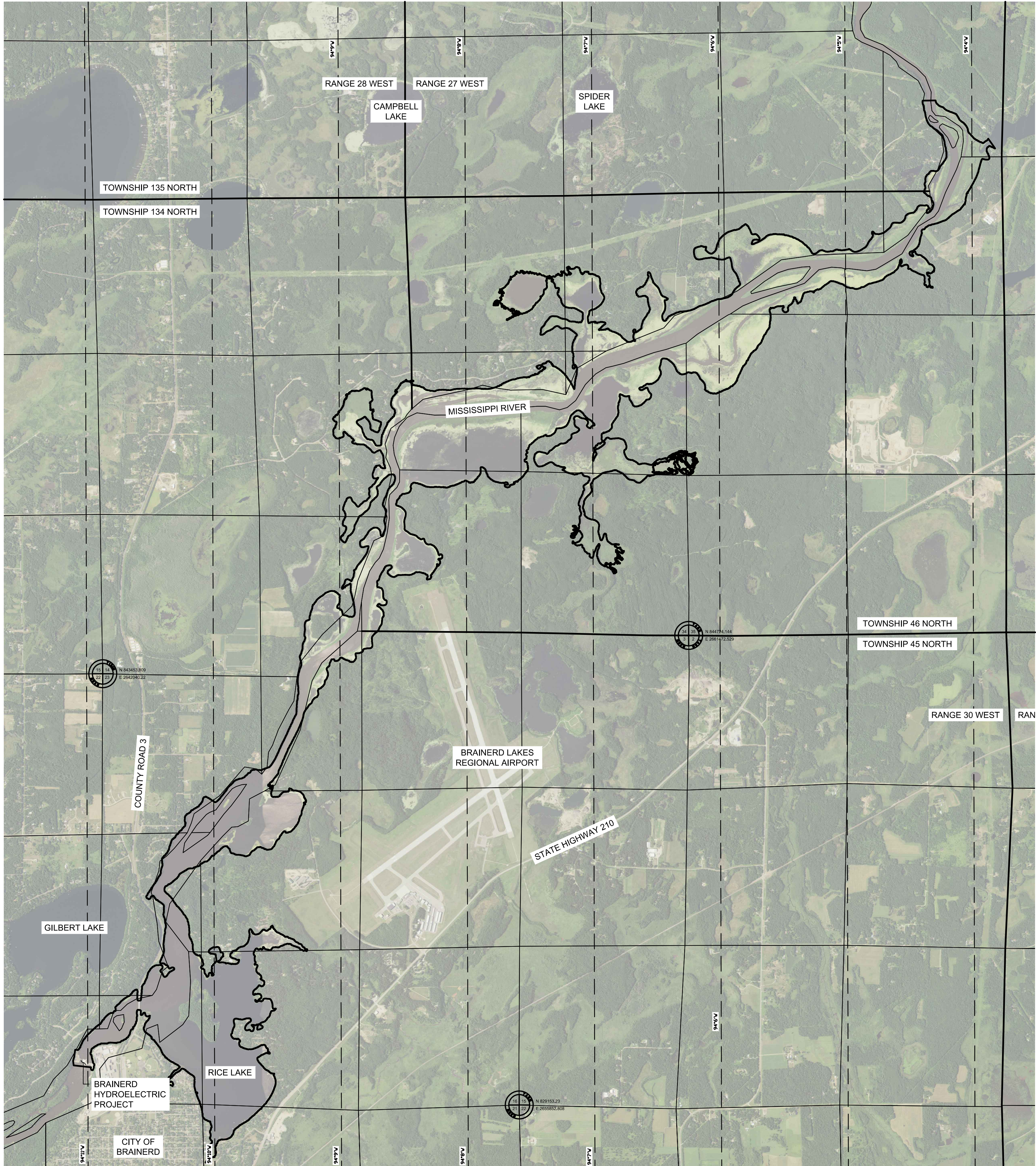
Appendix E

Exhibit F – Project Drawings (CEII)

Appendix F

Exhibit G – Project Maps (Public)

CADD USER: VERONICA SACKETT; FILE: M:\ADPTWORK\US23\1810\605_EXHIBIT G\DWG PLOT; SCALE: 1:1; PLOT DATE: 7/27/2021 10:49 AM



- FERC PROJECT BOUNDARY/AREA OF POTENTIAL EFFECT
(LIDAR ELEVATION 1185.0 NAVD 88 FEET)
- PLS SURVEY LINES (MNGEO)
- - - - - MERIDIANS (ESRI)

NOT A PROPERTY BOUNDARY SURVEY.
PUBLIC LAND SURVEY SYSTEM DATA,
PARCEL LINE DATA, AND ELEVATION DATA
ARE FROM EXISTING PUBLICLY AVAILABLE
GIS, ELEVATION, AND PARCEL DATA AND
MAPS AND DO NOT REFLECT A FIELD
SURVEY OR SUBDIVISION BY BARR
ENGINEERING COMPANY.

NO FEDERAL LANDS ARE INCLUDED WITHIN
THE PROJECT BOUNDARY BASED ON CROW
WING COUNTY PARCEL OWNERSHIP DATA.

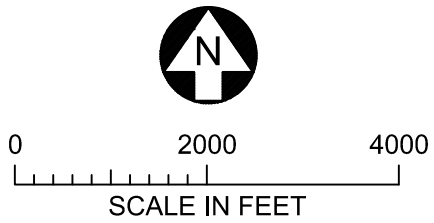
CROW WING COUNTY LAND OWNERSHIP
DATA SHOWS NO LANDS OWNED BY THE
APPLICANT WITHIN THE PROJECT
BOUNDARY.

REFERENCE POINT DATA FROM CROW
WING COUNTY SURVEYOR OFFICE
CONVERTED TO STATE PLANE CENTRAL.

2019 AERIAL IMAGERY FROM USDA-FSA
NAIP IMAGERY PROGRAM.

LIDAR DATA FROM CROW WING COUNTY
LIDAR PROJECT (MERRICK & COMPANY)
2008.

THIS DRAWING IS A PART OF THE
APPLICATION FOR LICENSE MADE
BY THE UNDERSIGNED THIS 9TH
DAY OF JULY, 2021.



I HEREBY CERTIFY THAT THIS PLAN, SPECIFICATION,
OR REPORT WAS PREPARED BY ME OR UNDER MY
DIRECT SUPERVISION AND THAT I AM A DULY LICENSED
PROFESSIONAL LAND SURVEYOR UNDER THE LAWS OF
THE STATE OF MINNESOTA.

PRINTED NAME PAUL R. TOKARCZYK
SIGNATURE *Paul R. Tokarczyk*
DATE 07/09/2021 LICENSE # 45025

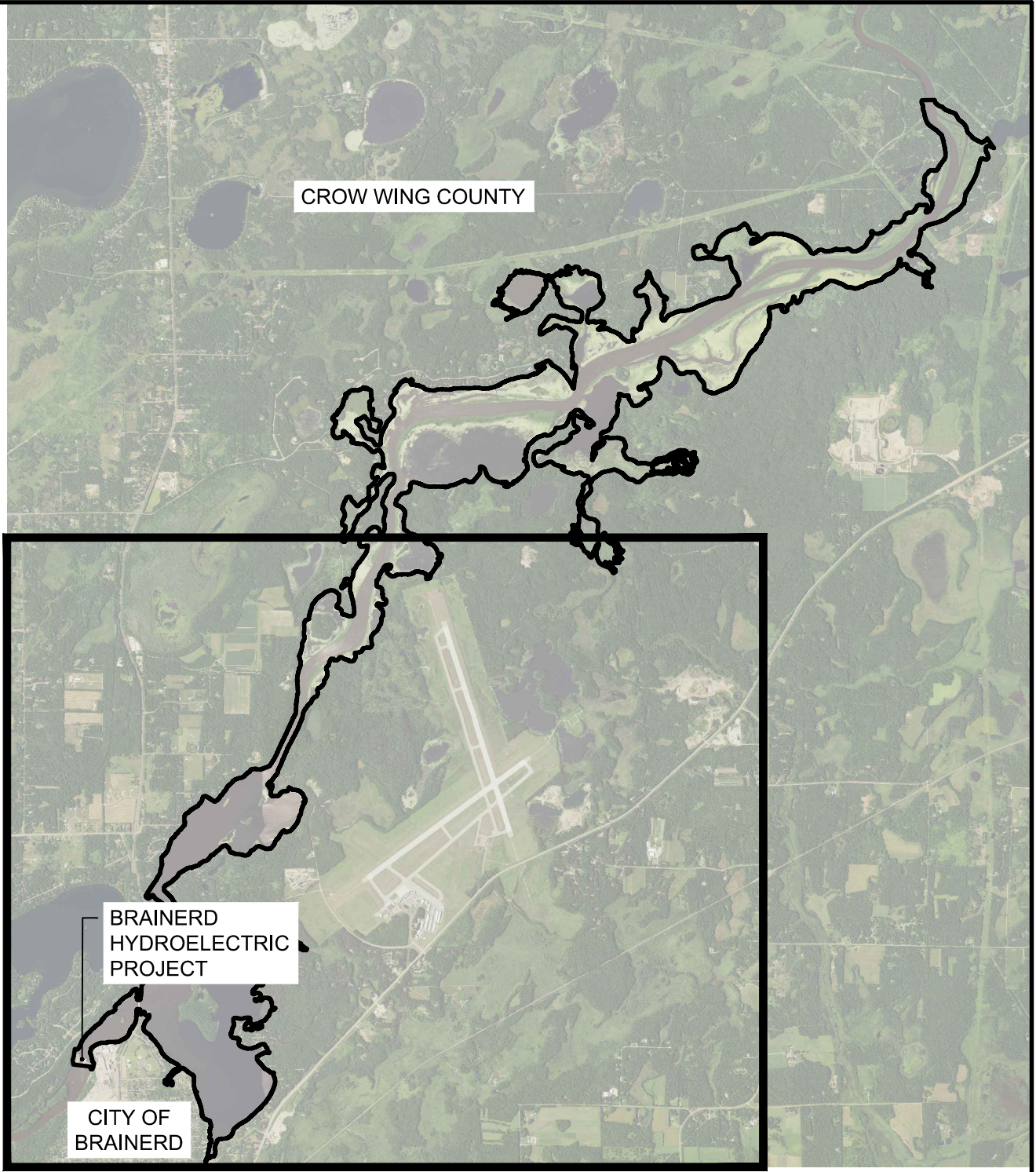
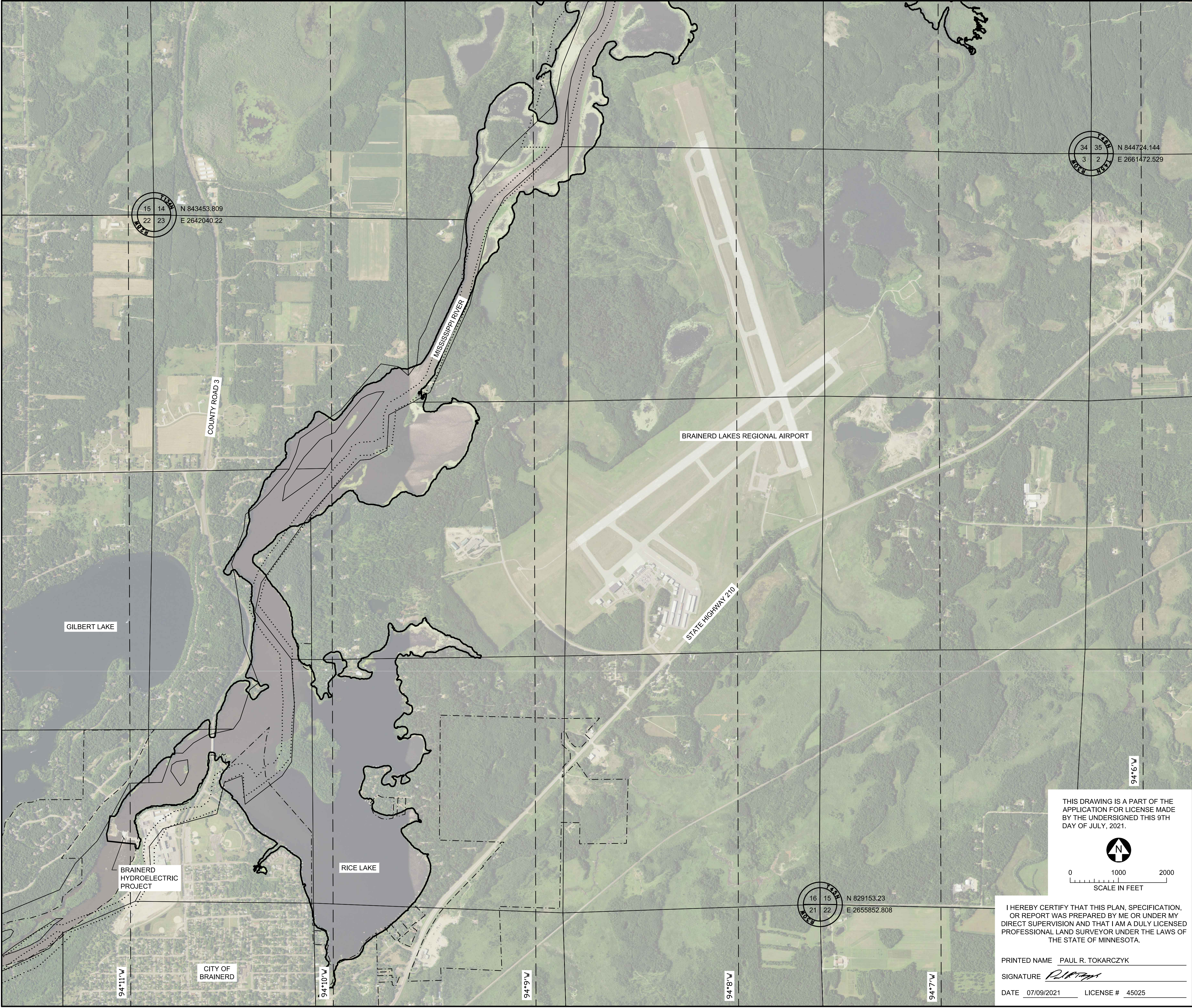
EXHIBIT G DRAWING 1 OF 4

BRainerd PUBLIC UTILITIES BRainerd, MN

BRainerd HYDROELECTRIC PROJECT
F.E.R.C. PROJECT NO. 2533
MISSISSIPPI RIVER
CROW WING COUNTY, MN
PROJECT BOUNDARY LOCATION

SCALE: AS SHOWN BARR ENGINEERING CO.
DATE: 07/09/21 MINNEAPOLIS, MN

CADD USER: VERONICA SACKETT FILE: M:\ADPTWORK\US23\1810\605_EXHIBIT 02.DWG PLOT SCALE: 1:1 PLOT DATE: 7/21/2021 10:52 AM



- MAP EXTENT
- FERC PROJECT BOUNDARY/AREA OF POTENTIAL EFFECT (LIDAR ELEVATION 1185.0 NAVD 88 FEET)
- HISTORICAL EXTENT OF MISSISSIPPI RIVER (GLO HISTORIC PLAN MAPS)
- PLS SURVEY LINES (MN GEO)
- CITY BOUNDARIES (MN GEO)
- MERIDIANS (ESRI)

NOT A PROPERTY BOUNDARY SURVEY. PUBLIC LAND SURVEY SYSTEM DATA, PARCEL LINE DATA, AND ELEVATION DATA ARE FROM EXISTING PUBLICLY AVAILABLE GIS, ELEVATION, AND PARCEL DATA AND MAPS AND DO NOT REFLECT A FIELD SURVEY OR SUBDIVISION BY BARR ENGINEERING COMPANY.

NO FEDERAL LANDS ARE INCLUDED WITHIN THE PROJECT BOUNDARY BASED ON CROW WING COUNTY PARCEL OWNERSHIP DATA.

CROW WING COUNTY LAND OWNERSHIP DATA SHOWS NO LANDS OWNED BY THE APPLICANT WITHIN THE PROJECT BOUNDARY.

REFERENCE POINT DATA FROM CROW WING COUNTY SURVEYOR OFFICE CONVERTED TO STATE PLANE CENTRAL.

2019 AERIAL IMAGERY FROM USDA-FSA NAIP IMAGERY PROGRAM.

LIDAR DATA FROM CROW WING COUNTY LIDAR PROJECT (MERRICK & COMPANY) 2008.

EXHIBIT G DRAWING 2 OF 4

BRAINERD PUBLIC UTILITIES BRAINERD, MN

BRAINERD HYDROELECTRIC PROJECT
F.E.R.C. PROJECT NO. 2533
MISSISSIPPI RIVER
CROW WING COUNTY, MN
PROJECT BOUNDARY LOCATION

SCALE: AS SHOWN BARR ENGINEERING CO.
DATE: 07/09/21 MINNEAPOLIS, MN

THIS DRAWING IS A PART OF THE APPLICATION FOR LICENSE MADE BY THE UNDERSIGNED THIS 9TH DAY OF JULY, 2021.

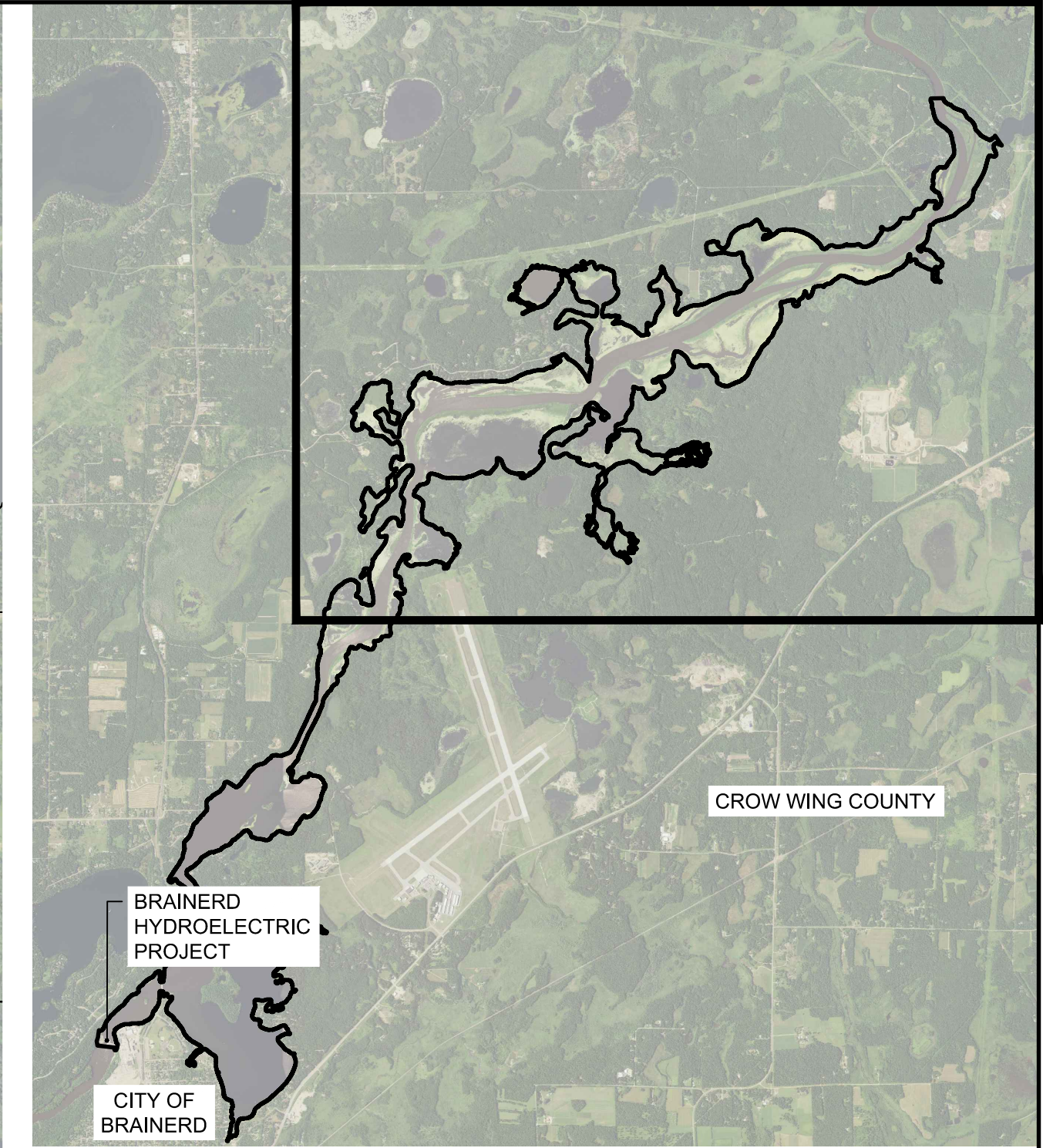
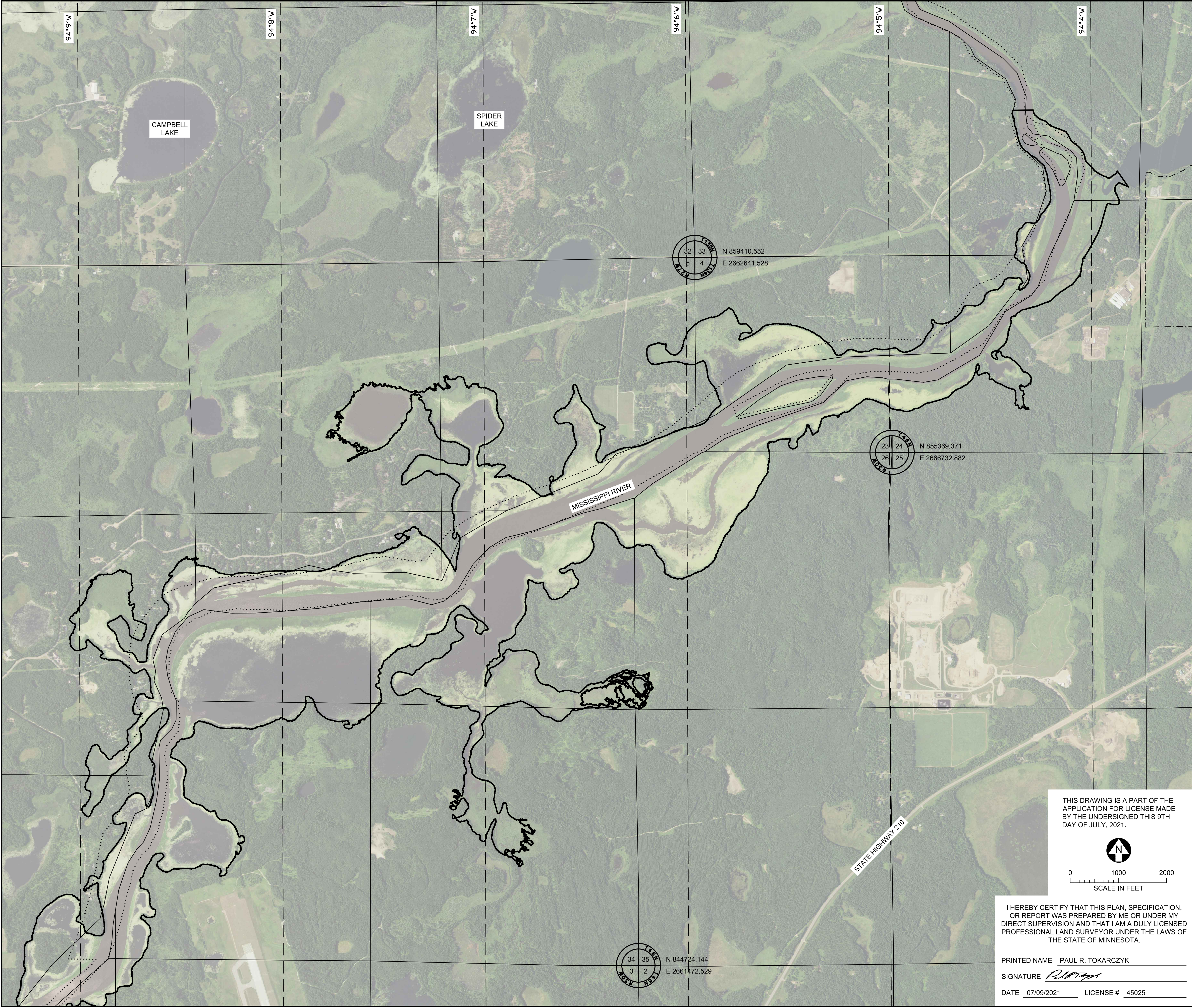


0 1000 2000
SCALE IN FEET

I HEREBY CERTIFY THAT THIS PLAN, SPECIFICATION, OR REPORT WAS PREPARED BY ME OR UNDER MY DIRECT SUPERVISION AND THAT I AM A DULY LICENSED PROFESSIONAL LAND SURVEYOR UNDER THE LAWS OF THE STATE OF MINNESOTA.

PRINTED NAME PAUL R. TOKARCZYK
SIGNATURE *Paul R. Tokarczyk*
DATE 07/09/2021 LICENSE # 45025

CADD USER: VERONICA SACKETT; FILE: M:\DEPT\WORK\1\US231810\605_EXHIBIT G3.DWG; PLOT SCALE: 1:1; PLOT DATE: 7/21/2021 10:55 AM



- MAP EXTENT
- FERC PROJECT BOUNDARY/AREA OF POTENTIAL EFFECT (LIDAR ELEVATION 1185.0 NAVD 88 FEET)
- HISTORICAL EXTENT OF MISSISSIPPI RIVER (GLO HISTORIC PLAN MAPS)
- PLS SURVEY LINES (MNGEO)
- CITY BOUNDARIES (MNGEO)
- MERIDIANS (ESRI)

NOT A PROPERTY BOUNDARY SURVEY. PUBLIC LAND SURVEY SYSTEM DATA, PARCEL LINE DATA, AND ELEVATION DATA ARE FROM EXISTING PUBLICLY AVAILABLE GIS, ELEVATION, AND PARCEL DATA AND MAPS AND DO NOT REFLECT A FIELD SURVEY OR SUBDIVISION BY BARR ENGINEERING COMPANY.

NO FEDERAL LANDS ARE INCLUDED WITHIN THE PROJECT BOUNDARY BASED ON CROW WING COUNTY PARCEL OWNERSHIP DATA.

CROW WING COUNTY LAND OWNERSHIP DATA SHOWS NO LANDS OWNED BY THE APPLICANT WITHIN THE PROJECT BOUNDARY.

REFERENCE POINT DATA FROM CROW WING COUNTY SURVEYOR OFFICE CONVERTED TO STATE PLANE CENTRAL.

2019 AERIAL IMAGERY FROM USDA-FSA NAIP IMAGERY PROGRAM.

LIDAR DATA FROM CROW WING COUNTY LIDAR PROJECT (MERRICK & COMPANY) 2008.

EXHIBIT G DRAWING 3 OF 4

BRAINERD PUBLIC UTILITIES BRAINERD, MN

BRAINERD HYDROELECTRIC PROJECT
F.E.R.C. PROJECT NO. 2533
MISSISSIPPI RIVER
CROW WING COUNTY, MN
PROJECT BOUNDARY LOCATION

SCALE: AS SHOWN BARR ENGINEERING CO.
DATE: 07/09/21 MINNEAPOLIS, MN

THIS DRAWING IS A PART OF THE APPLICATION FOR LICENSE MADE BY THE UNDERSIGNED THIS 9TH DAY OF JULY, 2021.

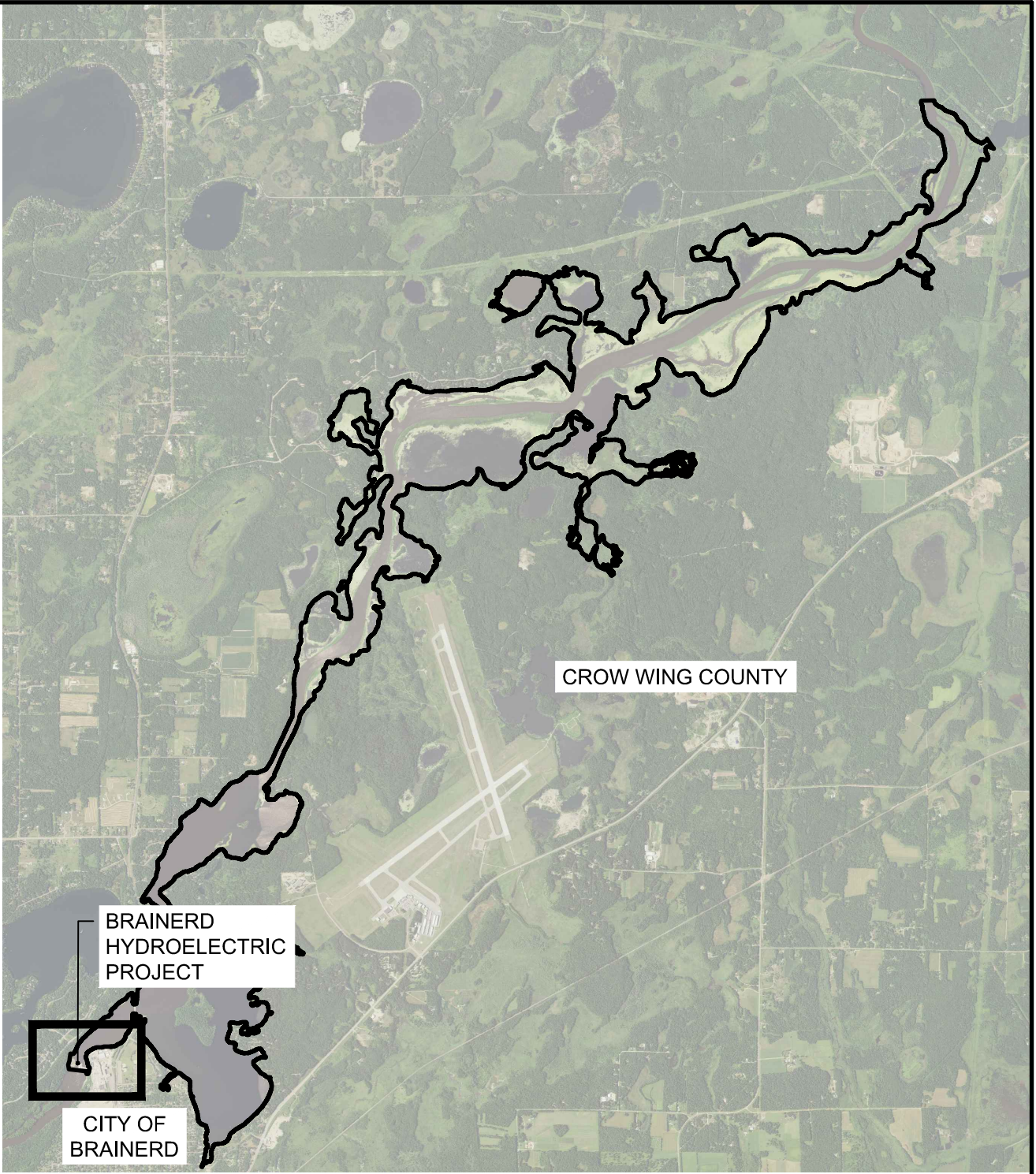
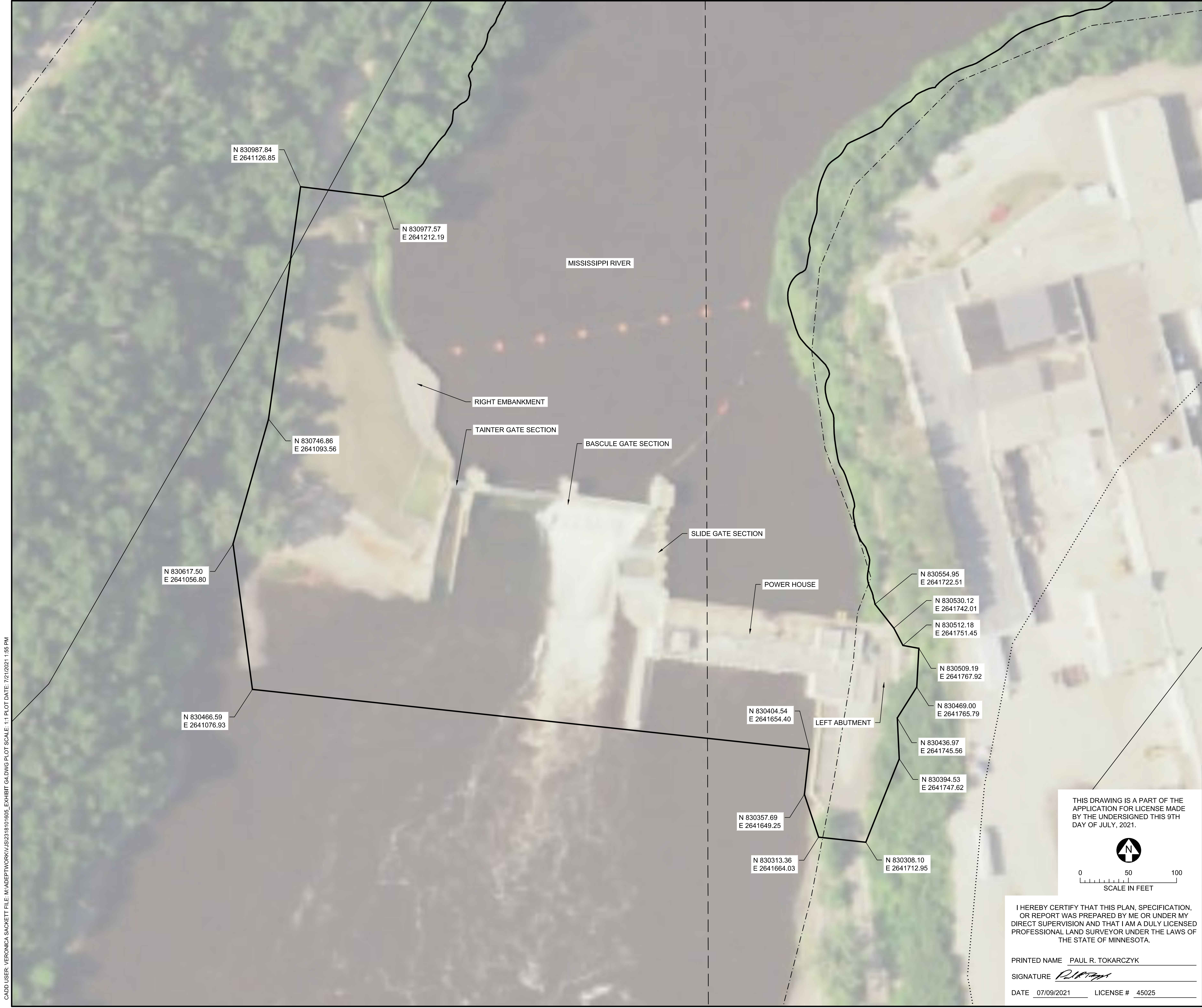


0 1000 2000
SCALE IN FEET

I HEREBY CERTIFY THAT THIS PLAN, SPECIFICATION, OR REPORT WAS PREPARED BY ME OR UNDER MY DIRECT SUPERVISION AND THAT I AM A DULY LICENSED PROFESSIONAL LAND SURVEYOR UNDER THE LAWS OF THE STATE OF MINNESOTA.

PRINTED NAME PAUL R. TOKARCZYK
SIGNATURE *Paul R. Tokarczyk*
DATE 07/09/2021 LICENSE # 45025

CADD USER: VERONICA SACKETT; FILE: M:\DEPT\WORK\US23\1810\605_EXHIBIT GALDING PLOT SCALE 1:1; PLOT DATE: 7/21/2021 1:55 PM



- MAP EXTENT
- FERC PROJECT BOUNDARY/AREA OF POTENTIAL EFFECT (LIDAR ELEVATION 1185.0 NAVD 88 FEET)
- HISTORICAL EXTENT OF MISSISSIPPI RIVER (GLO HISTORIC PLAN MAPS)
- PLS SURVEY LINES (MN GEO)
- CITY BOUNDARIES (MN GEO)
- MERIDIANS (ESRI)

NOT A PROPERTY BOUNDARY SURVEY. PUBLIC LAND SURVEY SYSTEM DATA, PARCEL LINE DATA, AND ELEVATION DATA ARE FROM EXISTING PUBLICLY AVAILABLE GIS, ELEVATION, AND PARCEL DATA AND MAPS AND DO NOT REFLECT A FIELD SURVEY OR SUBDIVISION BY BARR ENGINEERING COMPANY.

NO FEDERAL LANDS ARE INCLUDED WITHIN THE PROJECT BOUNDARY BASED ON CROW WING COUNTY PARCEL OWNERSHIP DATA.

CROW WING COUNTY LAND OWNERSHIP DATA SHOWS NO LANDS OWNED BY THE APPLICANT WITHIN THE PROJECT BOUNDARY.

REFERENCE POINT DATA FROM CROW WING COUNTY SURVEYOR OFFICE CONVERTED TO STATE PLANE CENTRAL.

2019 AERIAL IMAGERY FROM USDA-FSA NAIP IMAGERY PROGRAM.

LIDAR DATA FROM CROW WING COUNTY LIDAR PROJECT (MERRICK & COMPANY) 2008.

EXHIBIT G DRAWING 4 OF 4

BRAINERD PUBLIC UTILITIES BRAINERD, MN

BRAINERD HYDROELECTRIC PROJECT
F.E.R.C. PROJECT NO. 2533
MISSISSIPPI RIVER
CROW WING COUNTY, MN
PROJECT BOUNDARY LOCATION

SCALE: AS SHOWN BARR ENGINEERING CO.
DATE: 07/09/21 MINNEAPOLIS, MN