



**US Army Corps  
of Engineers**  
St. Paul District

# St. Paul District Water Safety Plan



**28 April 2008**

## **PURPOSE**

This St. Paul District Water Safety Plan defines program goals and objectives, identifies action items, communication methods and implementation strategies, establishes priorities, identifies constraints and resource needs to address those constraints, and recommends methods for educating the public about boating and water safety. Implementation will continue to be accomplished through in-house direct contacts, partnership endeavors, interagency cooperation and public education campaigns both direct and indirect. This plan defines the framework of the St. Paul District efforts to reduce recreation related incidents with an emphasis in water safety. It is a working tool for use by District staff in accomplishing the goal of reduced incidents

## **INTRODUCTION**

### **Background**

>The St. Paul District is federal steward to over 461,000 acres of public lands and waters. This includes 14 multipurpose reservoirs, and approximately 280 river miles on the Mississippi River, a multi-use navigation project. The projects span 5 states with 2 reservoirs located in North Dakota, 1 on the Minnesota/South Dakota border, 10 in Minnesota and one in Wisconsin. The Mississippi River borders MN, WI and IA in the District boundaries. Because District public use facilities exist because of our water resource mission, nearly all of our recreation occurs on or near water or water related structures and are mostly located outdoors. The very nature of the physical location and type of activities undertaken by the public while avoidable in most cases, can lead to occasional mishaps.

### **District Objective**

>The CESO/CECW memorandum, dated 15 Sep 2006, subject: Visitor Recreation Safety, provided a new USACE objective to reduce the recreation-related public fatality rate by 40% from the baseline rate, by the end of fiscal year 2008. CEMVD-SO memorandum, dated 14 April 2008 further established a regional goal for each District to reduce public recreation fatalities by 50% by the 4<sup>th</sup> quarter of FY 09 using FY 07 data as baseline. For MVP, this relates to a goal of no more than 4 fatalities in FY 08 and 3 in FY 09. MVP manages its public recreation safety program using a risk management process with an ultimate goal of 0 public recreation related fatalities annually. Physical and program considerations define that the District can have a direct impact on factors impacting some mishaps and in other cases; an indirect impact can be achieved. Both direct and indirect situations and process will be addressed in this plan.

## **PHYSICAL CHARACTERISTICS**

### **Reservoirs**

>4 of the reservoirs in MVP have federal ownership on the entire shoreline with virtually all access to the water and shoreline areas requiring using Corps operated public use areas, Corps fee owned and leased public use areas, or crossing federal property managed for wildlife management or recreation purposes. 10 reservoirs have Corps ownership at the water control (dam) structure and adjacent areas. The fee title land at these sites is used for the control structure and adjacent day use and overnight camping facilities. The majority of the remainder of the shoreline at these reservoirs is owned privately, owned by other federal agencies, the state, in tribal ownership or owned by local governmental units. Many of the water areas on these reservoirs with limited ownership are vast and although Title 36 enforcement could be extended to the entire reservoir, resource constraints and conflicts/overlaps in jurisdictions with federal, state and local agencies have resulted in little or no visitor assistance activities or physical presence by COE personnel on the water surfaces. A representative example is Leech Lake where 44.45 acres are owned in fee at the location of the dam where launching facilities, overnight camping and shoreline fishing areas are operated by the Corps, yet the water surface and shoreline miles of Leech Lake is 117,000 acres at normal pool and 182 miles respectively. The impounding structure regulates Leech Lake and 13 smaller lakes encompassing 192 square miles of water.

### **Mississippi River Nine-Foot Channel Project**

>The Mississippi River navigation project runs from the head of navigation at Upper St. Anthony Falls Lock and Dam in Minneapolis, MN to Lock and Dam 10 at Guttenberg, IA and stretches for 280 river miles. MVP operates and maintains 13 Lock and Dam sites in the District and has 4 Corps managed recreation areas in the District on the Mississippi River. Blackhawk Park in pool 9 is a Corps operated recreation area with overnight camping, day use, use, boat launching, and swimming facilities. The remaining three recreation areas include boat launching and day use facilities in pools 9 and 10. There are 29 leased recreation areas on Corps fee owned property in MVP pools on the Mississippi River.

## **WATER SAFETY ACTIONS/IMPLEMENTATION/MESSAGE DELIVERY**

A wide variety of programs and management tools are designed to increase public awareness and to create a safe water recreation environment. Audiences are reached through formal interpretive programs, individual contacts, public announcements, signs, posters, promotional products, etc. Drowning statistics, expected message retention, attaining the maximum benefit for the effort, reaching the greatest number of target audience, and partner/stakeholder input all are considered in the message content and delivery. Actions are described and categorized in this section.

## **District Water Safety Team**

>As part of the Public Safety Sub-Committee of the District Safety Committee, representatives from field sites, Safety Office, PAO form this sub-committee with the charge to review the overall program, review any reportable incidents and accidents, review and/or formulate lessons learned and share information and resource ideas.

## **The HQUSACE Water Safety Products Delivery Team (PDT)**

>This PDT consists of a field office or district level representative from each USACE Division, and is led by Lynda Nutt from the National Operations Center (NOC) for Water Safety in Sacramento District. This team develops safety products, which are available to field offices in an annual on-line catalog at <http://watersafety.usace.army.mil>. Products include award winners such as “Safe Passage” video and on-line curriculum, the “Young and the Reckless” video, and the “Bobber the Water Safety Dog” campaign with on-line cartoons (<http://bobber.info>). There are products available that appeal to all ages but the majority of the products are geared towards children. The National Water Safety Program will still carry those products but will start focusing on more products for adults especially men (age 18-35 years) because this is our “typical drowning victim” nationally. Members of the PDT developed a Resource Guide of water safety program outlines and scripts that are available on the Natural Resource Management (NRM) Gateway website in the water safety section at <http://corpslakes.usace.army.mil>. Everyone is encouraged to submit outlines and ideas to the Gateway’s “Good Enough to Share” section. This PDT has also made arrangements with companies to broker their safety items so that projects can purchase safety items via credit card at reduced costs. For example, the fatal vision goggles that simulate intoxication were a brokered purchase and the price was greatly reduced by the company because of the number ordered by all COE Districts. This PDT also coordinates photo contests for USACE employees. <http://safeboatingcampaign.net> is a source of water/boat safety print material, brochures, educational and statistical information, stickers and DVD’s.

## **Printed Materials**

>Sea-Bags. These 14" X 17" litterbags have two sides of printed boating and water safety information. These bags are distributed to visitors and serve a dual purpose of keeping our projects clean and educating visitors about safety.

>Project Brochures. Projects strive to include a water safety tip or message in each project brochure and park information guide.

>NRRS Receipt Messages. Every National Recreation Reservation Service (NRRS) receipt has space for including a message. It is recommended that safety messages be added.

>HQUSACE Products. Annually, each project orders products from the USACE Water Safety PDT's on-line catalog. These items include the adult and children's brochures, fun books, stickers, coloring sheets, posters, and various media products. Most of these products are bilingual in both English and Spanish. These products are used as educational incentives in a variety of ways to promote boating and water safety.

>Posters. Water safety posters are placed on bulletin boards on project lands, especially those near water, i.e. boat ramps, beaches, marinas, etc.

>Safety Promotional Products. Since the implementation of the National Policy that clarified the use of safety promotional products in 2002, we have worked together to pool any funds available to purchase these items as a District, because increasing quantities reduces costs. Products that have been produced include pencils, wrist bands, magnets, fishing bobbers; can koozies, sticky-hands, and floating key chains

### **Media**

>Public Service Announcements (PSA's). When HQUSACE provides audio and video PSA tapes, these should be distributed by each project to local television and radio stations. In addition to those, some field offices have produced their own audiotapes in cooperation with local radio stations. Overall, use of PSAs by the media on a voluntary basis is low. Since PSA requirements were relaxed in the 1980s, it has been almost impossible to get the media to use PSAs without some expenditure. Purchasing airtime or space for water safety public service announcements (PSAs) through television, radio, and print media is often the only way to guarantee their use. Since our funding is limited, major holiday weekends should be targeted for these expenditures due to higher visitation rates.

>News Releases/Newsletters. Each field office may distribute news releases to the media. Since the theme is not always boating or water safety, it can be included as a secondary topic when appropriate. The District's Public Affairs Office also sends out releases on behalf of field sites in conjunction with special events, nationally designated days or weeks, around holidays, or and on an as needed basis when flows, ice conditions, pool levels or other conditions or activities may dictate a release is necessary.

>Billboards. Water safety billboards have been used historically in MVD, however costs have resulted in curtailing use the last several years. These were very popular and are a great way to reach large numbers of people.

### **Visitor Assistance**

>Boat Patrol. Due to the physical and resource constraints previously discussed in this plan, boat patrols are completed only at Lake Ashtabula and on the Mississippi River very infrequently and usually only during very targeted times or events.

>Boat Safety Checks. Park rangers perform checks for safe boating equipment, both at boat ramps before boats are launched and on the water. This is primarily done during National Safe Boating Week, which is typically held the week prior to Memorial Day.

### **Recreation Facility Management**

> Beach inspections. Beaches are established in accordance with the criteria in EM 1110-1-400, Recreation Facility and Customer Service Standards, dated 1 Nov 2004. Beaches are inspected annually, and as deemed necessary by each Project, to eliminate underwater obstructions and hazards and review design considerations that may enhance safety.

>Restricted Area Marking. Restricted areas identified above and below dam structures are marked with signs and buoys. These areas were defined by an interdisciplinary team in accordance with criteria established in ER1130-2-520, including evaluations of physical characteristics, hydraulic analysis. A marking program was then coordinated with Functional Offices and executed at the water control structures.

> Signage. Beach rules are placed at all entrances to those facilities. Safety suggestion signs should be separated from beach rules on signs to avoid customer confusion with what is enforceable by issuance of a citation. Signs for no lifeguards, no diving, watch your children, are displayed as necessary.

>Rescue equipment. According to EM 1110-1-400, it is optional to have lifesaving posts at designated beach areas. This should include one ring buoy with rope (or the equivalent throw bag) and a may include a 10-12 foot pole (shepherd's hook).

>Although not formalized, Lake Ashtabula and Gull Lake offer Life Jacket loans if project personnel or campground hosts are notified of the need.

### **Professional Development**

>Motorboat Operators. It is the policy of the USACE that all employees who operate USACE vessels less than 26 feet in length, be trained, tested, and licensed in accordance with ER 385-1-91 and other applicable regulations. There are 8 Instructors in the District with at least one in each geographic area (Western Flood, Headwaters, and Miss River Sections).

> National Water Safety Congress (NWSC)/ National Safe Boating Council (NSBC). Membership in these organizations is encouraged especially for our non-profit partners who may be eligible for grants. It is recommended that District employees attend the International Boating & Water Safety Summit annual meetings, which allows interchange of ideas with many experts in the field.

## **Interpretation, Outreach & Education**

>Project interpretive programs should make water safety the main focus of a majority of the presentations. Weekend presentations are recommended during peak visitation periods. Safety messages, if not the main topic, should be incorporated into all interpretive programs. Miss River L/Ds and Natural Resource Section should include information on navigation and river safety in all of their Lock & Dam tours.

>Outreach interpretive presentations to schools, civic groups, and clubs at various off-project locations are strongly encouraged. The award winning “Safe Passage” video, developed by the National Operations Center (NOC) for Water Safety, has curriculum that is available on-line for kindergarten through sixth-grade teachers. This product is designed for teachers to use alone, and it reduces the need for a ranger presentation. A video targeting a teenage audience named “The Young and the Reckless” became available in 2005. Projects should make these videos available to all schools in their area and campaign to make sure teachers are aware of them.

>Kids in Boats is a program uses small electric powered boats (MVP owns 2 of these) to teach rules of the road, PFD usage, hypothermia danger, and other hazards associated with water based recreation. This a cooperative program with Omaha District sharing hardware and personnel resources. Targets elementary students in grades 4-6.

>Low Head Dam Models. Following a drowning event in 2004 at the Sag Diversion Weir, two low head dam models illustrating the “Drowning Machine” were constructed by project personnel and used extensively in areas and at sites not previously targeted for water safety programs. These models are very well received, provide a “real life” experience with water flowing and have a great impact on the people viewing them, usually children and young adults.

>Seamoor Safety-The Water Safety Sea Serpent. The USACE National Operations Center for Water Safety, led by Lynda Nutt of the Sacramento District, shares three personal watercraft robots driven by a Sea Serpent named Seamoor Safety. The Water Safety PDT oversees the Seamoor Safety Campaign and Dana Matics, from Wilmington District is the current National Seamoor Coordinator. Pam Doty at Lake Shelbyville coordinates the schedule for the Midwestern Seamoor, which includes the St. Paul District area. Projects interested in using Seamoor are responsible for the shipping charges to their project, training operators utilizing the training video and manual, and damage costs created by operator error. The Midwestern Seamoor use can be requested by emailing Pam Doty or by going to the NRM Gateway website in the water safety category.

## **Special Events, Contests & Display**

>Natural Resource personnel in the St. Paul District annually staff water safety displays at boat shows, river festivals, dam safety days and other events which are held in close proximity to our recreation areas. These events provide opportunity to pass along water safety messages to large audiences/group of people. Examples include staffing a water safety display at Riverfest in La Crosse, WI, the Sandy Lake Institute Water Institute, and the Grand Forks Safe Kids Exposition. Often up to 1,000 kids are reached during each of these concentrated efforts.

## **STRATEGY**

MVP will continue to make recreation related safety, with a focus on water safety, the top priority in interpretive and outreach programs. Using available resources, the action items discussed in WATER SAFETY ACTIONS/IMPLEMENTATION/MESSAGE DELIVERY will be utilized to communicate the water safety messages developed with the intent to gain as much appreciation for the risks associated with water based recreational use and how to mitigate those risks while still enjoying a quality experience. The method of reaching the maximum number of users at all ages with the messages using the limited resources available will be established at each project site. Lessons learned and innovations in this area will be shared on a continual basis through the Natural Resource Leadership Council in MVP. Full participation and coordination with Support and Functional Offices will be coordinated. Reviews of action items and execution of this plan will be completed quarterly by the MVP Public Safety Sub-Committee and the Operations Project Manager for the Recreation and Natural Resource Project. If re-prioritization is necessary, it will be completed through these quarterly reviews. MVP's strategy will continue to be execution with emphasis on water safety at Corps owned and operated facilities. Consistent with the DRAFT CEMVD-PD-KM memorandum *Reporting of Public Fatalities at CEMVD Projects* being finalized in May 2008, activities will occur at owned and operated areas and those other critical water surface areas where authorities and resources dictate we expand the focus of these efforts. The reference draft CEMVD Memorandum is attached to this plan as Appendix 1 and will be updated upon it being published in final form. Appendix 1 also contains a summary of MVP comments provided on the memorandum.

## **IMPLEMENTATION PLAN - TIMELINE**

The action items discussed in this plan are part of the existing Natural Resource Management Program in MVP and will continue to be implemented on an ongoing basis utilizing the available resources balancing this with other critical missions at multi-use projects in MVP. It is expected that with actions that have been historically completed and are built in to existing programs, the goals of reducing recreation based fatalities by 50% by the 4th quarter of 2009 is attainable. The action items have and will be continued on a prioritized basis and the Best Management Practices (BMPs) list and other information generated in the MVD Natural Resource Management Functional Group information exchange will again be reviewed to see



what items may be added to this plan at little or no costs.

### **CONSTRAINTS TO IMPLEMENTATION**

The MVP Water Safety Plan is written in general terms to provide tools for staff to implement action items intended to communicate the messages in the plan to the target audiences. Those messages and tools are and will be used at varying levels at each MVP site as resource allow on a prioritized basis. Several years of dwindling recreation budgets and associated manpower reductions, increased unfunded mandates, increased costs of doing business, increased reporting and program requirements, have all impacted the ability to fully implement and increased or expand the focus and efforts in the public recreation safety areas. One of the most used and most effective methods of communicating the messages and educating the target audiences is our Interpretive Program. In order to continue operations at many of our multi-purpose sites, interpretive programs have been scaled back impacting effectiveness.

### **ADDITIONAL RESOURCES REQUIREMENTS TO IMPLEMENTATION OF ADVANCED WATER SAFETY PROGRAM**

MVP's water safety program has been managed to balance the available resources and priorities to assure critical District missions were completed and appropriate levels of interpretation, outreach, hands on and educational efforts are included. The number of fatalities historically has been low in MVP and most resulted from blatant operating or judgment errors. It is recognized by field staff and leadership in MVP that water safety efforts could be increased if resources were available. It is difficult to quantify if additional resources equating to increased staffing for boat patrols, program activities, high profile educational materials, etc., would result in a lower number of fatalities at the reportable areas of the District lands and waters. It is recognized that increased public awareness, concentrated enforcement and patrol activities in specific areas should result in better safety practices by the using public with the goal of reducing incidents both minor and major.

The table below represents a proposed plan and associated costs that would fully implement a program that includes water safety patrols focusing on highest use periods on 9 reservoirs and the Mississippi River pools. The numbers represent resources above and beyond the current funding level and would only be implemented if additional income was realized. In addition to increased patrols, the Rangers would complete programming, outreach to increase partnering and interagency cooperation, hands on and face-to-face program implementation and other responsibilities directed related to public recreation safety. MVP is the only MVD District with no support personnel in Operations Division dedicated to the Recreation and Natural Resource program therefore all planning, programming, and implementation actions are executed by field personnel as collateral duties.

SITE	MANPOWER COSTS	SUPPORT COSTS*	PROMOTIONAL ITEMS#	COMMENT
Lake Ashtabula	\$80,000-1 FTE	\$18,000	\$21,000	Implement 60 days after receipt of funds
Headwaters Lakes+	\$160,000-2 FTE	\$36,000	\$18,000	Implement 60 days after receipt of funds
Miss River+	\$216,000-2.7 FTE (4-8 Month Seasonal employees)	\$73,000	\$18,000	Implement 60 days after receipt of funds
Western MN Reservoirs+	\$80,000-1 FTE	\$18,000	\$ 8,000	Implement 60 days after receipt of funds
Totals	\$536,000	\$145,000	\$65,000	

***Additional Resources Above Present Levels Needed to Implement Advanced Plan***

\*SUPPORT COSTS include vehicle costs, vessel costs, space costs, training, travel, supplies and materials to support the position requirements.

+ The 2 FTE identified for the 6 Headwaters Lakes and the FTE identified for the Western MN reservoirs would begin implementing a program where increased presence on the entire water surface of the reservoirs would be included. This expands the program on these reservoirs with limited ownership beyond what is considered presently owned and operated and administered waters in CEMVD-PD-KM Memorandum contained in Appendix 1. For the Miss River, it expands patrol and Visitor Assistance efforts to “run of the river” areas where current efforts concentrate on Corps facilities and immediate adjacent areas.

Since resources to expand MVP’s water safety program are related directly to personnel resources, implementation of the expanded program could begin almost immediately upon receipt of funds. It could also be done incrementally with some influx of additional income by utilizing existing staff, hiring students or temporary hires versus the full FTE identified in the table, use of contracts, expanded volunteer program and partner and stakeholder participation. Specific actions or plans can be developed quickly using known sources and resources, best management practices and established priorities once income amounts are identified.

#Incremental costs for enhancements to the MVP Water Safety Program which would not rely on personnel increases are listed below and shown in the Promotional Items column in the table:

3 billboards funding in FY 08	\$2500 x 4 =	\$10,000
Scrolling message signage	4 @ \$5500 =	\$22,000
Purchase of promotional items for distribution at baseball games- major and minor leagues		\$30,000
Shipping and misc costs for Seamoor use at District functions		\$ 3,000

# Attachment 1

CEMVD-PD-KM

XX April 2008

MEMORANDUM FOR .....

SUBJECT: Reporting of public fatalities at CEMVD projects

1. PURPOSE. To provide guidance on reporting requirements for public recreation fatalities incidents, accidents and other events within MVD's recreation mission.

2. GOVERNING AUTHORITY. CFR Title 36, Section 327 governs the public use of water resource development projects administered by the Chief of Engineers. It establishes policy to manage the natural, cultural, and developed resources... (and) providing the public with safe and healthful recreational opportunities.

3. ACCIDENT REPORTING AUTHORITY.

a. AR 385-10, The Army Safety Program, was released on 23 August 2007 and became effective on 23 September 2007. Paragraph 3-5.a.(8), What To Report, states the requirement to report "Fatal accidents involving members of the visiting public when involved in authorized recreational activities...to include all title 36 USACE properties."

b. On 19 November 2007, the USACE Chief of Staff issued the Incident, Accident, and Event Reporting Procedures Memorandum. Under the Reportable Actions Comparison Matrix, two reporting requirements are identified:

(1) CAT 3 SIR, 1: The death of Public at USACE project or recreational area.

(2) PRELIMINARY ACCIDENT NOTIFICATION (PAN): Fatal accidental injury to member(s) of the public at USACE owned or operated area(s) where CFR Title 36, Chapter III, Part 327 - Parks, Forests and Public Property, are applicable.

4. ACCIDENT REPORTING GUIDELINES. The following criteria determines the reporting medium:

a. COMMANDER'S CRITICAL INFORMATION REQUIREMENTS (CCIR). Report all public fatalities using the Commander's Critical Information Requirements (CCIR) notification per district reporting Standard Operating Procedure (SOP).

CEMVD-PD-KM

SUBJECT: Reporting of public fatalities at CEMVD projects

b. PRELIMINARY ACCIDENT NOTIFICATION (PAN). Report and record all public fatalities that occur on USACE owned or operated area(s) that meet all the following criteria:

- (1) Occurs on USACE owned or operated area(s) under Title 36 authority;
- (2) Has an authorized recreational mission; and,
- (3) Designates personnel with citation authority.

5. ACTION. Ensure that Public recreation days are accrued and reported only for projects meeting paragraph 4.b. criteria. Enclosure 1 provides a sample matrix for developing District reporting requirements.

**Public Recreation Fatality Reporting Matrix**

<b>PROJECT</b>	<b>DESCRIPTION</b>	<b>REPORTING BOUNDARIES</b>
<b>Jack Lake</b> Flood Control Project with earthen dam, reservoir, outlet works and recreational facilities (beach, campground, trail systems, etc.).	The USACE owns, operates and maintains all water and lands within and directly surrounding the reservoir. The entire boundary of this project is clearly delineated. All access points are controlled and monitored for visitation data. Title 36 is actively enforced throughout the project.	All public fatalities that occur within the physical boundaries of this project shall be reported in accordance with applicable requirements.
<b>Lock and Dam Sites</b>	MV_ owns, directly operates and maintains the lock and dam structures and operational facilities and lands directly associated with and adjacent to these structures. Access to the specific Lock and Dam sites is restricted and monitored. Each Lock and Dam has designated and clearly marked restricted areas above and below each structure. MV_ does not patrol nor actively enforce Title 36 outside of these operational areas or in the pools upstream or downstream of these structures. No lock and dam facility has an authorized recreation mission.	All public fatalities that occur at or within designated restricted areas of Lock and Dam structures or within the direct confines of government owned and fenced operational lands adjacent to these structures shall be reported in accordance with applicable requirements.
<b>River Recreation Areas</b>	MV_ owns and either directly operates or has out-granted these areas located adjacent to the river. The management of these areas is funded through the Recreation Business line. Title 36 is actively enforced in the pool areas associated with these recreation areas.	All public fatalities that occur within the physical boundaries of these recreation areas or within the pool area of the river when these access points were used shall be reported in accordance with applicable requirements.
<b>Reservoir Sites with Limited Ownership</b>	MV_ owns limited land resources immediately adjacent to the water control structure and operates and maintains recreation areas on these lands; yet impounds extremely large reservoir areas with no federal ownership around the reservoir. Title 36 is enforced only at the specific designated Corps owned and operated areas.	All accident and incidents that occur within the restricted areas of the dam structures and at the Corps operated and maintained recreation areas shall be reported in accord with applicable requirements. This does not include accidents or incidents that occur in reservoir areas outside Corps designated swimming beaches, dam restricted areas or recreation areas.

**MVP Comments on CEMVD-PD-KM draft memo forwarded 23 April 2008:**

Added the suggested wording in the **Reservoir Sites with Limited Ownership** box in the table contained in the memo.

This does not appear to capture the issue we have raised re our Headwaters and a couple Western Flood sites where we only own and operate very minor parcels immediately adjacent to the structure.

Under 4.b. these MVP areas could and most likely would be interpreted to meet the criteria for reporting since they:

(1) Could be construed to "operate" the water areas since it is impounded by the structure (this has been interpreted in the past due to us being able to enforce Title 36 in the water areas however we cannot due to resource restraints and overlapping authorities with state and local entities.

(2) All these areas have an authorized recreation mission through blanket authorizations in the Flood Control Act of 1944 and the Federal Water Project Recreation Act of 1965 among others.

(3) All have employees designated with citation authority however our policy is for use at the Corps operated areas only.

We do report visitation at our owned and operated project as well as dispersed use (which is a WAG). What we are trying to get away from is a requirement to report a fatality or incident that occurs in Walker Bay which is miles from anywhere we have operational oversight on at Leech Lake (example that can be duplicated at each site).

Per the MVP-OP memorandum put together for the Commander's signature in Dec 07, the Recommendation reads as follows:

"3. RECOMMENDATION. The District Commander requires reporting of accidents and incidents that occur at project areas that are under the direct operational control of the St. Paul District. A matrix of these projects and reporting boundaries is attached."

The matrix attached to Jim's email also does not capture our situation although it does capture owned and operated sites and Miss River pools well. I've attached the file with a suggested addition to the matrix/table with a row entitle "Reservoir Sites with Limited Ownership". The row that defines "River Recreation Areas" could be modified to include some of the verbiage I've recommended to avoid adding a row to the table.

My concern is the memo and table as written leave this open to broad interpretation and leans towards reporting everything on our unique reservoir sites. It does a nice job of defining the River situation in the Lock and Dam site information in the table.