

*Advocates for preserving, protecting, and promoting the historic, commercial, spiritual, and environmental significance of the Mississippi River, the city of Minneapolis, the people and their communities.*



Diane Hofstede  
Great River Coalition  
3359 Central Ave NE  
Minneapolis, MN 55418

November 20, 2017

Daniel P. Wolf, Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Pl E #350  
St Paul, MN 55101

Re: In the Matter of Xcel Energy's Renewable Development Fund (RDF) Annual Report, Tracker Account True-up, and Request for 2018 Rider Factor, PUC Docket Number: E-002/ M-17-712

Dear Mr. Wolf:

The Great River Coalition (GRC) is a member supported 501 c3 nonprofit organization. We work collaboratively within the community to enhance the vitality of the river environment and continue to build healthy relationships with the communities along its banks. Our mission is to advocate for preserving, protecting and promoting the historic, commercial and environmental significance of the Mississippi River, the City of Minneapolis and its relationship to the people and their communities. GRC appreciates the opportunity to comment on the Crown Hydro RDF Grant Contract.

GRC urges the Commission to terminate the grant contract because the Crown Hydro project is against the public interest. Aesthetic flow is a key and perhaps paramount issue raised by the Crown Hydro proposal. In a 2007 letter to the Minneapolis Park and Recreation Board regarding Crown Hydro, former Vice President Walter Mondale eloquently described the importance of St. Anthony Falls to the City of Minneapolis:

“While the precise location of this natural force has changed somewhat since the mid-1800’s when it began to be seen as a force for our historical development, there is no question that it is this same force of water going over a natural 50 foot drop which is the reason Minneapolis is here today—it is the force which Park visitors come to see, and it is this force which [Crown Hydro] will materially impair.” (See attached letter on page 1)

Crown Hydro’s current license provides for minimum flows that would allow the Falls to go dry during the winter (Nov 15 - March 15) and during nights year round (as would be allowed by the

AFAP). Drying up the St. Anthony Falls would be a significant and catastrophic impact of the Crown project.

In addition to threatening the integrity of St. Anthony Falls, allowing the Crown project to proceed would preclude future opportunities to showcase the Falls and this historical and unique area of our city. For example, Friends of the Lock and Dam and a large coalition of riverfront stakeholders are currently engaged in a process to repurpose the Lock and Dam into a spectacular amenity on our Riverfront. The Crown project should not be allowed to preclude plans for park development.

GRC requests that the Commission consider the Crown project's potential for significant impacts on the aesthetic flow and further, the significant impacts dewatering the Falls would have on the City of Minneapolis, when making its decision whether to terminate the grant contract.

The St. Anthony Falls has deep historical roots to our Native people and spiritual significance. It is at the Falls where the birthing of our Native children took place and burial grounds of their ancestors. The roar of the Falls dimmed the wailing of the birthing mothers and the tears of the grieving members.

As Walter Mondale writes about the Falls: "It is the attraction and it is the underpinning of our history. To even think about impairing it—to any extent— seems unimaginable public policy."

Sincerely yours,

A handwritten signature in cursive script that reads "Diane Hofstede". The signature is written in dark ink and is positioned below the text "Sincerely yours,".

Diane Hofstede, President  
Great River Coalition  
3359 Central Ave NE  
Minneapolis, MN 55418

WALTER F. MONDALE  
50 S. 6<sup>TH</sup> STREET  
SUITE 1500  
MINNEAPOLIS, MINNESOTA 55402

December 19, 2007

Honorable Members of the Minneapolis Park & Recreation Board,

Before you later today will be a vote on a continuation of efforts of a private developer to excavate and place a hydro electricity generating plant on the most historic land in our City. As some of you know, in my public life I have been protective of rivers, their scenic beauty and historical significance to our commerce, our culture, our very being. When in the Senate, Gaylord Nelson and I authored the Scenic Rivers legislation which now protects the St. Croix for the tens of thousands of public visitors who wonder at its scenic beauty every year, and which implicates protection for the Mississippi. Protecting the Mississippi River's intersection with the legacy of Minneapolis is equally deserving of protection. Happily, the subject land belongs to the public by virtue of your ownership.

I write today to urge that you, as a matter of public policy, conclude that the land you own in the most historically sacred area of our great City be simply off-limits to commercial development. Two projects have threatened to desecrate the most sensitive of land you own—namely the condominium project on the old Fuji Ya site, and the again-pending attempt to locate a hydro electric generation plant steps from the Mill Ruins. The latter proposal, no matter what the view of paid consultants, is inherently a taking of the public's most historic property in this most historic area—the force of the falls over the St. Anthony apron. I and I am sure countless citizens who care deeply about our great City would urge you to draw a strong line of resistance against any commercially driven sell-off of park lands in these few blocks where Minneapolis was born. Regardless of any study, a few couple of facts are beyond change:

1. What is really involved here is the request by a private developer (not even a public utility) to commercialize for private gain the force of the flow of water over the approximately 50 feet of drop known as St Anthony Falls. While the precise location of this natural force has changed somewhat since the mid-1800's when it began to be seen as a force for our historical development, there is no question that it is this same force of water going over a natural 50 foot drop which is the reason Minneapolis is here today—it is the force which Park visitors come to see, and it is this force which the developer will materially impair.



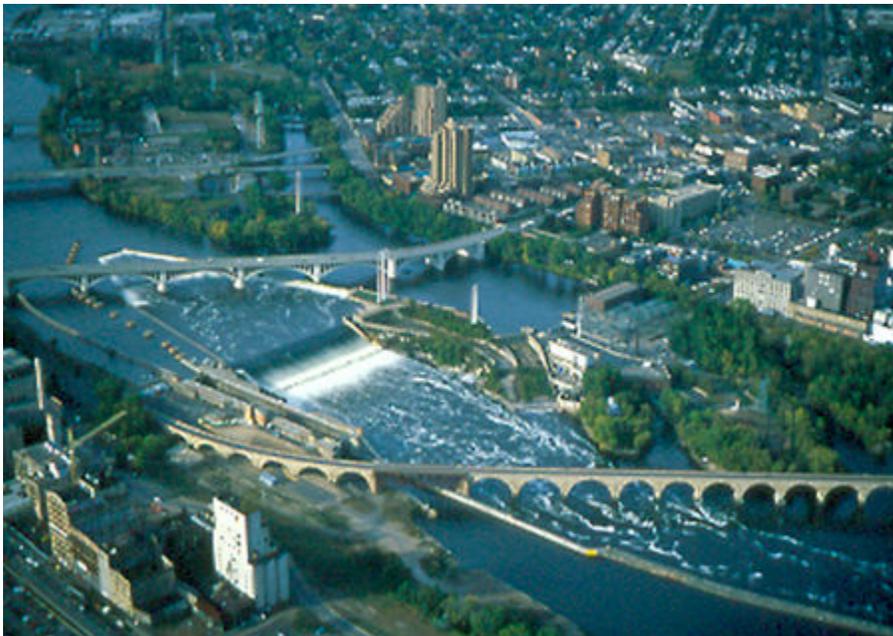
The force of the St Anthony Falls which drove the turbines which powered our early flour and lumber mills, shown above, has been described by the St Anthony Falls Laboratory as follows:

*“At Lake Itasca, the average flow rate is 6 cubic feet per second. At Upper St. Anthony’s Falls, the northernmost Lock and Dam, the average flow rate is 12,000 cubic feet/second. There are 7.489 gallons of water in a cubic foot. One cubic foot of water weighs 65.4 pounds. A 48 foot semi-truck trailer is a 3,600 cu. foot container. At Itasca, it would take 10 minutes for one semi-trailer of water to flow out of the lake into the Mississippi. At St. Anthony Falls, the equivalent of 3 semi-trailers full of water go over the falls every second.”*

We understand that the developer has assured the Park Board that the flow would not be impaired beneath 1,000 cubic feet per second. Look at the picture above and appreciate a 90+ reduction in the force of the flow and ask yourself what this will do to the most historically significant resource—the most visited attraction—that which we come to see as the power which gave rise to an infant industry by which Minneapolis became the flour capital of the world. Can anyone conclude that the assault from this project on our citizen’s right to history is not harmed. And does anyone really believe

that a contractual assurance relative to reduction of flow will really be locally enforced after this land and the related regulation is subject to the politics of a federal agency. The only true safeguard against future harm rests with your resolve.

2. Let me speak briefly to the area and importance of the Falls in it. The historical area, of course, is called the St Anthony **Falls** Historic District. It is not called the Stone Arch Bridge Historic District, nor the Lock and Dam Historic District, nor the River Parkway Historic District, nor even the Mill Ruins Historic District. That which makes it historic, of course, is the Falls itself—the flow of water and its force. Below is a photograph of the historic district where Minneapolis was born. One is immediately drawn, as are the tens of thousands of Park visitors, to the Falls. It is the attraction and it is the underpinning of our history. To even think about impairing it—to any extent—seems unimaginable public policy.



Note that Xcel Energy has developed a park so that visitors can now stand literally feet from the mighty force of the water over St Anthony.

The historic sensitivity of the land you own which is implicated in both the hydro plant and the earlier condominium project, is noted by the public designations of historic lands. Not only is this property in the St Anthony Falls Historic District, it is in the smaller and even more historically sacred West Bank Milling Area and the St Anthony Falls Waterpower Area. There are precious few acres of land in all three of these historically designated areas, and the land you own at issue here is in all three—in the few acres where the power of the Falls generated power to actually drive milling machines in the few mills which put Minneapolis on the map, as they say.

While I understand that it may be that excavation, construction and operation of this plant could be done without damage to surrounding mill ruins (another assumption

which if wrong may be forever lost to local oversight), it appears that the most respected archeologist (Minnesota State Archeologist Anfinson) familiar with the ruins and artifacts--exposed and un-exposed, states that the 100+ year old engineering marvels yet unexposed but potentially capable of restoration and public appreciation are at risk:

*While there may be no adverse archaeological impacts to this project, the exit tunnel for this facility will adversely impact a significant historic structure, namely the historic tailrace tunnel system. The construction of the turbines could also prevent the restoration of the historic waterpower canal entrance should that be proposed in the future.*

As to the highly sensitive nature of this site, the Department of the Interior/MNRRRA, adamantly opposing the condominium project on the nearby piece of Park Board owned land--the Fuji Ya site, commented:

*“Of all the nationally significant resources for which Congress established the MNRRRA (Mississippi Natural Resources and Recreation Area), the Saint Anthony Falls Historic District is one of the most important.”*

And the Minnesota Preservation Alliance lent its opposition to such development, stating:

*“The Wave development site occupies a significant place in the St. Anthony Falls Historic District and the Minneapolis West Bank Milling Area.”*

The Minnesota Historical Society has said that this property is: ***“in the historic district’s inner circle.”***

In conclusion, I regret not being able to attend today’s meeting, but please consider these remarks and a public policy resisting the urging of developers wanting to buy off such important Park lands as those in this historic district.

Respectfully submitted,

*WALTER MONDALE*

Walter Mondale