



December 7, 2017

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

VIA ELECTRONIC FILING

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:

On behalf of the National Parks Conservation Association (NPCA), we thank you for the opportunity to comment on Xcel Energy's Renewal Development Fund (RDF) grant to Crown Hydro. For reasons more fully stated below, we urge the Public Utilities Commission to exercise its supervisory authority over the RDF program and recommend a grant termination to allow the reallocation of these RDF monies.

Since 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System, working together with our 1.3 million members and supporters nationwide – including more than 22,000 in Minnesota – to preserve our nation's natural, cultural and historic heritage for future generations. Crown Hydro is proposing to site its project within the boundaries of the Mississippi National River and Recreation Area at the Upper St. Anthony Falls Lock and Dam, which the National Park Service (NPS) is now utilizing for interpretive programs and ranger-led tours. Therefore, we are particularly concerned about the hydro project's potential impacts on the national park resources and visitor experience.

Since Crown Hydro first received a license in 1999, and was one of the original grantees under the RDF program in 2001, there have been dramatic changes to the Central Riverfront in Minneapolis where they intend to site the hydro project. Today, this area sees 2.5 million visitors a year thanks to strategic investments by various public agencies, including the Minneapolis Park and Recreation Board and Minnesota Department of Natural Resources. That number is expected to grow exponentially when the long-awaited Water Works park project, which is adjacent to the Upper lock, opens to the public in 2019 as a year-round destination.

The Upper lock itself has also changed dramatically in recent years. In June 2015, this lock was closed to navigation to protect waters upstream from invasive Asian carp. There is now growing interest in seeing the lock activated as a world-class visitor destination.¹ Through a partnership with the Army Corps of Engineers, NPS now manages the visitor area on the site, which has resulted in a ten-fold increase in visitors to the lock in the last two years and that number is also expected to grow.

In order to develop a community-driven vision for the future use of the Upper lock with the national park at its center, NPCA and MSR Architects hosted a series of open houses, surveys and workshops over several months that engaged over 100 community members and local leaders. In September 2017, we released the resulting vision called “Transforming the Lock,” (attached) that demonstrates the shared goal of seeing the lock become a focal point for visitors along the riverfront. The vision contains ideas to leverage the national park, develop dynamic storytelling opportunities, and improve access to the site and adjacent areas. Within the recommendations, we note that the Crown Hydro project is incompatible with many of these anticipated uses and would change the recreational nature of the entire area (see p. 60).

Crown Hydro wants to site its project within the boundary of one of America’s 417 national park sites and in one of the most visited regional parks in the City of Minneapolis. The site is adjacent to the historic Stone Arch Bridge and the Upper St. Anthony Falls Lock, which is now serving as a national park visitor destination. Crown Hydro’s failure to obtain site control, secure necessary permits or begin construction – all requirements under the 2017 RDF legislation² – demonstrates this is an ill-conceived project unlikely to receive any community support. For these reasons, we urge the Commission to recommend a grant termination for the Crown Hydro project so that the RDF monies can be reallocated for a more appropriate use.

Sincerely,



Christine R. Goepfert
Senior Program Manager
Midwest Region

Encl: *Transforming the Lock: A Vision for a National Park Visitor Experience*

¹ Prior to the lock closure, the Central Mississippi Riverfront Regional Master Plan was approved and envisions the lock to be used as a visitor and interpretation center. The Meet Minneapolis tourism plan, *Destination Transformation 2030*, and the Minneapolis Downtown Council plan, *Intersections: The Downtown 2025*, also call for an iconic visitor destination along the city’s central riverfront.

² See Laws 2017, Chapter 94, Article 10, Section 29.

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