

Theodore A. Tucker
St. Anthony Falls Alliance
319 5th St SE
Minneapolis, MN 55414

November 22, 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 St. Anthony Falls Alliance (SAFA) advocates for implementation of the Master Plan for the Central Mississippi Riverfront Regional Park ("Regional Park")¹. SAFA consists of representatives appointed by the neighborhood organizations along the Minneapolis central riverfront: North Loop Neighborhood Association, Downtown Minneapolis Neighborhood Association, Marcy-Holmes Neighborhood Association, Nicollet Island East Bank Neighborhood Association and the St. Anthony West Neighborhood Association. Our neighborhood associations represent more than 21,000 Minneapolis residents and small businesses.

When the RDF grant was awarded sixteen years ago, Crown Hydro argued that its project would spur riverfront development and provide an opportunity for historical interpretation of water power in Minneapolis. The Crown project failed to move forward, but in the intervening years, the Central Riverfront has undergone a dramatic transformation, and others have accomplished the goal of water power interpretation at St. Anthony Falls. The Minnesota Historical Society operates the Mill City Museum, provides tours of the Pillsbury A Mill and Hennepin Island Hydroelectric Plant, and offers interpretive panels in Water Power Park and Mill Ruins Park. Crown Hydro stagnated while the riverfront developed into what we enjoy today. It is in the public interest to direct the remaining RDF grant funds to more worthy projects.

The Crown project has failed to move forward in part because Crown Hydro does not control the site for which it holds a FERC license. Since its decision to use RDF grant funds for the purchase of turbines that will not work on the licensed site, Crown Hydro has unsuccessfully sought to locate the project on riverfront public land. SAFA supports termination of the RDF grant because Crown Hydro cannot find a site consistent with full implementation of the Master Plan for the Regional Park. The Crown Hydro project would interrupt current park use, preclude future development, and adversely impact the economic and social fabric of the surrounding area. For these reasons, SAFA supports termination of the RDF grant.

The Minneapolis Park and Recreation Board (MPRB) has consistently objected to this project on many grounds, including that construction and operation of Crown Hydro would prevent implementation of its vision for the Central Riverfront. Permanent negative impacts on recreational opportunities that would be impeded or precluded once the facility is built include:

¹ https://www.minneapolisparcs.org/_asset/d6kv9t/central_riverfront_masterplan_approved.pdf
(Approved by the Minneapolis Park & Recreation Board and the Metropolitan Council)

- Negative impacts of Crown appropriation of water flow on the aesthetics of the Falls. SAFA agrees with the City of Minneapolis, National Park Service, MPRB and the Minnesota Department of Natural Resources that aesthetics of the flow over the Falls is of paramount importance. There is disagreement over what low flow means for St. Anthony Falls. This issue must be resolved before the impacts on the flow over the Falls by all proposed and existing hydroelectric facilities can be properly evaluated.
- All season use of the park, including at night. The Falls are a 24/7 feature. For example, private funds were raised to light the arches of the Stone Arch Bridge, a major bike connection with the University of Minnesota used year round all times of day and night.
- Negative impacts of reduced flow. Without the beauty and power of the Falls, the park loses its key attraction and risks losing park visitors. For example, over the past ten years, 400,000 school children from all over the state have visited Mill Ruins Park, the Mill City Museum and the Stone Arch Bridge through a Minnesota Historical Society program. Views of wet concrete resulting from reduced flow are not likely to inspire student awe and appreciation for natural resources in an urban area.
- “Negative impacts on planned bike routes, pedestrian routes, and canoe/kayak portages” are outlined by Nice Ride Minnesota in comments to FERC regarding the Crown Hydro Environmental Assessment, noting that: “The riverfront is the core of the Nice Ride bike share system usage. Our three busiest stations (the IDS center downtown, the 100 Main station at Saint Anthony Main, and the Coffman Memorial Union station at the University of Minnesota) form a triangle centered on Saint Anthony Falls the Stone Arch Bridge (the most popular downtown infrastructure for urban cyclists in American #1 cycling city).” (See attached comments from William A. Dossett, Nice Ride Minnesota, dated October 28, 2016).
- “Major negative impacts on the central riverfront park and continued economic growth of this dense pedestrian, bike and transit friendly area” are also noted by the Sierra Club North Star Chapter in its letter to FERC filed in connection with the Crown Hydro Environmental Assessment (see attached Sierra Club letter dated November 1, 2016).
- Creation of hazards for small craft recreation with impractical portage route and turbulence
- Preclusion of access to the lock and dam structure from Water Works via the walkway on the upper river side according to the Regional Park Master Plan (see attached pages 7-16 to 7-19)
- Threat to a key initiative in the Regional Park Master Plan to transform the existing Lock & Dam structure into a visitor and interpretative center that would offer year-round amenities to park visitors (for example *The Falls* proposal made by Friends of the Lock and Dam)
- Risks to plans for historic interpretation in Water Works Park
- Risks to stability of the Stone Arch Bridge
- Potential water appropriation conflicts with plans for restoration of East Side Falls (a recreational feature required by Xcel Energy’s FERC license and included in the park Master Plan)
- Preclusion of park use by security for energy infrastructure. For example, security for the lower St. Anthony Falls hydro facility has interrupted connections for the West River Parkway. Crown Hydro poses a similar threat to use of the park at the Stone Arch Bridge. The

Minnesota Department of Natural Resources raised possible security concerns at a meeting with Crown Hydro on February 20, 2015. Crown has not yet addressed these concerns.

- Permanent negative impacts of generator noise on wildlife and park visitors

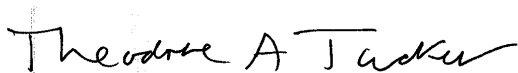
This small hydro project poses a devastating threat to current and future recreational opportunities in the Regional Park. Views of the Falls inspire ever increasing numbers of park visits, as well as private development, and they will continue to do so unless Crown Hydro is allowed to dewater the Falls.

Since as early as 1961, a driving principle behind planning for the central riverfront park has been to attract people to the river by improving access and connections. After decades of planning and billions of private dollars invested in large part because of proximity to the Falls, Crown Hydro arrives on the scene asking to introduce a physical barrier blocking access to the river and reducing flow over the Falls, all for the possibility of generating a small amount of expensive energy where Xcel Energy already operates a hydro plant.

SAFA requests termination of the Crown Hydro RDF grant because of its failure to make meaningful progress over a period of sixteen years. Since the RDF grant was awarded, the City and the Minneapolis Park and Recreation Board have moved forward with plans for revitalization of the riverfront, and the Crown project no longer fits into this vision. The Crown project blocks full implementation of the Master Plan for the Regional Park.

SAFA appreciates the opportunity to offer these comments to the Commission.

Sincerely yours,

A handwritten signature in black ink that reads "Theodore A. Tucker". The signature is written in a cursive, slightly slanted style.

Theodore A. Tucker
St. Anthony Falls Alliance, representing the North Loop Neighborhood Association, Downtown Minneapolis Neighborhood Association, Marcy-Holmes Neighborhood Association, Nicollet Island East Bank Neighborhood Association and St. Anthony West Neighborhood Association

William A. Dossett, Minneapolis, MN.

I am Executive Director of Nice Ride Minnesota, the non-profit owner-operator of the Twin Cities bike sharing system. We operate 198 bike share stations and over 1,800 bikes in the urban system and provide bike encouragement outreach services through low-income social service, events and festivals, and wellness programs. We also operate a fleet of bikes and community outreach program serving North Minneapolis, a low-income neighborhood bordering the riverfront.

The Environmental Assessment of the Crown Hydro Project in downtown Minneapolis is wholly inadequate because it fails to take into account dramatic changes in the use of our downtown riverfront. When I founded Nice Ride in 2008, the transformation of our riverfront from industrial use to become a world class cultural and recreational destination was just beginning. Today that transformation is moving at full-steam. The riverfront is the core of the Nice Ride bike share system usage. Our three busiest stations (the IDS center downtown, the 100 Main station at Saint Anthony Main, and the Coffman Memorial Union station at the University of Minnesota) form a triangle centered on Saint Anthony Falls the Stone Arch Bridge (the most popular downtown infrastructure for urban cyclists in American #1 cycling city).

Nice Ride is partnering with the National Parks Service on a paddle share service piloted in August and September. The response to this program, which is also centered on the river in downtown Minneapolis with stations both immediately above and below the Falls, has been incredible. Without advertising, usage of the kayaks available in self-service stations has dramatically exceeded expectations.

Construction of the Crown Hydro Project would preclude the opportunity to repurpose the Lock & Dam in a way that will enhance biking and pedestrian access and recreational use of the river in downtown. A full environmental review including assessment of current biking and paddling activity and growth trends should be conducted. The review should consider negative impacts on planned bike routes, pedestrian routes, and canoe/kayak portages caused by the proposed Project.

Document Content(s)

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SIERRA CLUB
NORTH STAR CHAPTER

2327 East Franklin Avenue
Minneapolis, MN 55406
612-659-9124
www.sierraclub.org/minnesota

November 1, 2016

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

VIA Electronic Filing

Re: Draft Environmental Assessment for Crown Hydro Docket No. P-11175-025

Dear Ms. Bose,

Thank you for the opportunity to comment on the Draft Environmental Assessment ("EA") for the Crown Hydro, LLC Crown Mill Hydroelectric Project ("Crown Hydro").

We are writing on behalf of the 50,000 members and supporters of the Sierra Club North Star Chapter. The Sierra Club objects to the efforts of Crown Hydro, LLP. ("Crown") to acquire rights to use land in the Central Mississippi Riverfront Regional Park ("Regional Park") in Minneapolis to construct and operate a hydroelectric plant. The Sierra Club has long advocated for city planning that combines dense, sustainable, land use development with parks and open space, particularly development that is bicycle, pedestrian and transit friendly. Redevelopment of the Minneapolis central riverfront has proved an immensely successful example of exactly this type of development. The driving force behind its success is the riverfront park centered on Saint Anthony Falls.

The Sierra Club is a strong proponent of statutory environmental review. Rigorous environmental review is standard for this area in Minneapolis. It develops information that is essential for decision makers to consider when making decisions that impact our environment. After analyzing the EA for the Crown Hydro, we have the following serious concerns:

- Licensing Crown Hydro is a major federal action that could have serious adverse effects on the landmark Saint Anthony Falls. This project has been an extremely controversial for decades and given this controversy, the issues surrounding Crown Hydro need to be given the scrutiny that a full EIS would afford. A full EIS would insure the community, the City of Minneapolis, and the Federal Government that all issues were given the highest level of review and alternatives considered before a decision on a license was made.
- The EA fails to address the cumulative impact of all the hydro projects on the flow of water over the Falls. Crown Hydro is the tipping point project that has the capacity to dewater the Falls. The impacts from reduced flow on recreation, parklands and other social and economic aspects need to be studied and quantified.

- The EA fails to understand the recreation issues surrounding the project, and if they are mentioned the EA fails to seriously analyze these issues.
- Alternatives were not considered. Given the circumstances, the “No Action” option needs to be seriously considered.

The EA fails to adequately consider the impact on aesthetic flow of water appropriation by Crown on the vibrancy of this area. The EA states that any minimum flow requirements would not apply “during the winter months (November 15 through March 15) and during nighttime hours (dusk till dawn) in all months.” This area, however, is active all year round, with visitors enjoying views of the Falls during the day and night. Without the centerpiece of the regional park, Saint Anthony Falls, the future growth of this area may stall. In addition, the Falls encourages people to use bikes and their feet to travel rather than cars. The EA does not adequately consider the impact of removing or reducing this major attraction.

In addition to threatening the flow over the Falls, the physical presence of the Crown Hydro facility would have a significant negative impact on recreational resources. The EA fails to address how the structure would restrict access from Downtown, Water Works and the Stone Arch Bridge to the Lock and Dam building, thereby subverting key elements of the Minneapolis Park and Recreation Board (“MPRB”) Master Plan calling for improved bicycle and pedestrian connections to the riverfront and a new visitor center at the Lock and Dam with spectacular views of the Falls. Friends of the Lock and Dam have put forward a proposal that could turn the Master Plan concept of a visitor center into a reality with a transformative design to repurpose the lock and dam into a visitor center. This bold vision would be precluded by the Crown Hydro project.

Trail connections around the Stone Arch Bridge on the west side of the river are identified as a Key Focus Area in a Major Gateway of the Regional Park in the Regional Park Master Plan (p. 7-9). The EA fails to adequately address this issue and ignores how the project will impede, frustrate or otherwise preclude year round 24/7 trail usage after construction of the project. Further, the project will preclude the use of the intake and outlet areas near the lock and dam as a kayak/canoe landing and portage location, another significant goal in the Regional Park Master Plan (p. 7-7).

The Crown Hydro project would be built on public land owned by the U.S. Army Corps of Engineers which is subject to a perpetual easement held by the MPRB for park purposes, including bicycle and pedestrian facilities. MPRB has been a consistent project opponent and previously denied Crown access to Park property. Although no details are presented in the EA, this project appears to require access to public land used for park purposes.

The Sierra Club is a strong supporter of green and alternative energy. However, the energy that would be produced by Crown is very expensive compared to other green energy sources. The Federal Power Act requires equal consideration of power production, energy conservation, the protection of fish and wildlife, the protection of recreational opportunities, and the preservation of other aspects of environmental quality.

To properly balance the small amount of expensive energy that would be generated against the major negative impacts on the central riverfront park and continued economic growth of this dense pedestrian, bike and transit friendly area, Sierra Club requests preparation of an Environmental Impact Statement.

Sincerely,

A handwritten signature in black ink, appearing to read "Mathews Hollinshead". The signature is fluid and cursive, with the first name "Mathews" being more prominent and the last name "Hollinshead" following in a similar style.

Mathews Hollinshead
Conservation Chair
Sierra Club North Star Chapter

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Document Content(s)

Sierra Club comments on Crown Mill Hydro Project.PDF.....1-3

3. Mill Ruins Park

Mill Ruins Park is the premiere visitor's destination on the west bank of the river. With St. Anthony Falls upper lock and dam closing to navigation, the potential to create a visitor's center at this structure will create even more demand. Proposed amenities to accommodate this increased visitor demand must also acknowledge that there are two different visitor markets: the daily riverfront user, who may commute or walk through, and the regional park visitor who may spend an afternoon along the riverfront.

Interpreting the water power story of the St. Anthony Falls and continuing to excavate, conserve, and interpret ruins will be a priority for this park. The interpretive recommendations are consistent with the West Bank Interpretive Plan. The recommendations for Upper Mill Ruins, where the Water Works site lies, are consistent with the on-going design efforts of the MPRB and the Minneapolis Parks Foundation. The recommendations for Lower Mill Ruins are consistent with the 1991 Mill Ruins Park master plan and the West Bank Interpretive Plan. **Partnerships and collaborations will be essential in this area. A visitor's center on the lock and dam will require three parties, the Army Corps of Engineers, the National Park Service, and the MPRB, to work together.**

Upper Mill Ruins Park

Supporting Initiatives (see Figure 33):

- A. Collaborate with partner agencies to create a visitor's center on the lock and dam structure. The building is anticipated to include an orientation center, interpretation, classroom, restrooms, food concession, and indoor/outdoor patio.
- B. Develop a park building at 1st Street S, near the 3rd Avenue Bridge adjacent to the rail grade that will facilitate vertical circulation. The building program

is anticipated to include food concession, restrooms, indoor/outdoor patio, and outfitting shop.

- C. Remove and historically record Fuji-ya building to expose historic ruins.
- D. Create multi-purpose outdoor "rooms" to interact with the ruins along 1st Street S that are accessible from both sides.
- E. Depict historic inlet canal from the riverbank to the gatehouse by exposing existing walls and bridge piers, using native plantings and pavement details to accurately interpret historic landscape patterns, and bridging new trail over the mouth of the inlet pond in the location of the historic rail bridge.
- F. Expose elements of the stone seawall upstream from the canal inlet while still improving the ecological function of the shoreline.
- G. Enhance pedestrian and bike connection under the Stone Arch Bridge in ways that depict and interpret buried mill ruins.
- H. Enhance and simplify bike trail connectivity at the terminus of the Stone Arch Bridge. Utilize proposed woonerf connection to provide better bike connections from downtown to the riverfront.
- I. Modify parkway alignment to provide a greater buffer to the 1st Street S/5th Avenue intersection in a manner that also interprets and respects the location of the gatehouse and canal.
- J. Provide traffic calming features along West River Parkway that give precedence to the bicycle and pedestrian user.
- K. Create a soft landing for canoes and kayaks.



Precedent Image of Allegheny Riverfront Park, Pittsburgh, PA



Precedent Image of Allegheny Riverfront Park, Pittsburgh, PA

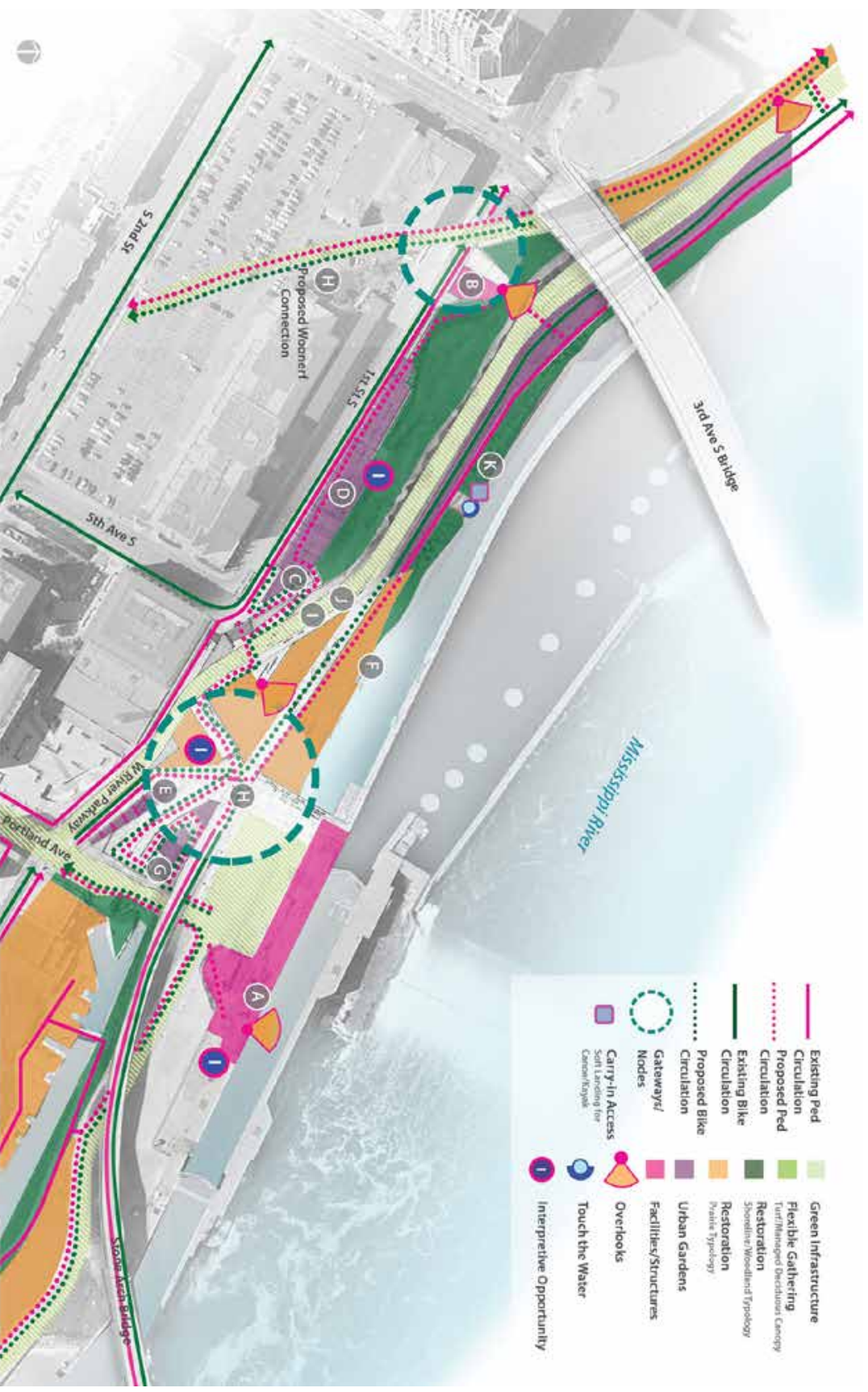


Figure 33 : Upper Mill Ruins Recommendations



Existing Conditions



Lower Mill Ruins Park

Supporting Initiatives (see Figure 34):

- L. Enhance connections from Mill City Museum to the river:
 - Long term: establish an accessible pedestrian tunnel connection between Mill City Museum and the River near the tailraces.
 - Short term: enhance the direct pedestrian connection between West River Parkway and the River via stairways which meander down the hillside.
- M. Continue to implement the ruin plan recommendations as stated in the 2014 West Bank Interpretive Plan.



Figure 34 : Lower Mill Ruins Park Recommendations