

Name: \_\_\_\_\_ affiliation (optional): \_\_\_\_\_

Please check the category/ies below that best represent the nature of your comment/s [Check all that apply]:

- |  |   |
|--|---|
| <input type="checkbox"/> Communication/Coordination      | <input type="checkbox"/> Ownership                                      |
| <input type="checkbox"/> Cultural and Historic Resources | <input type="checkbox"/> Public Access                                  |
| <input checked="" type="checkbox"/> Dam Removal          | <input type="checkbox"/> Public Safety                                  |
| <input type="checkbox"/> Economics                       | <input checked="" type="checkbox"/> Recreation                          |
| <input checked="" type="checkbox"/> Environmental        | <input checked="" type="checkbox"/> Sediment/Water Quality/Water supply |
| <input checked="" type="checkbox"/> Future Use           | <input type="checkbox"/> Social concerns                                |
| <input checked="" type="checkbox"/> Flooding             | <input type="checkbox"/> Study scope                                    |
| <input type="checkbox"/> Hydropower                      | <input type="checkbox"/> Other (please specify)                         |
| <input type="checkbox"/> Invasive Species                | _____   |
| <input type="checkbox"/> Navigation                      | _____   |

I FAVOR ONLY MAINTAINING STRUCTURES NECESSARY  
SUCH AS FLOOD CONTROL AND WATER SUPPLY. NO NEW  
HYDROPOWER.

In addition to the above topics, the Study Team would appreciate your input to the following:

1. How can we maintain/improve the human environment at Upper St. Anthony Falls lock?

*RESTORE NATURAL STATE OF RIVER AS MUCH AS POSSIBLE*

2. How can we maintain/improve the natural environment at Upper St. Anthony Falls lock?

3. How can we maintain/improve recreational opportunities at Upper St. Anthony Falls lock?

Comments can be handed in during the meeting, mailed to the address shown, or emailed to [MplsLocksDisposition@usace.army.mil](mailto:MplsLocksDisposition@usace.army.mil). We would appreciate your comments by October 20, 2019.

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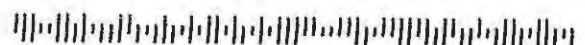
MINNEAPOLIS MN 553

16 AUG 2019 PM 71



US Army Corps of Engineers  
180 5th St. East, Suite 700  
St. Paul, MN 55101-1678  
Attn: N. Bischoff (PM-B)

55101-160075



Name: [REDACTED] affiliation [optional]: FRIENDS OF AALL

Please check the category/ies below that best represent the nature of your comment/s [Check all that apply]:

- |   |   |
|---|---|
| <input type="checkbox"/> Communication/Coordination         | <input checked="" type="checkbox"/> Ownership                           |
| <input type="checkbox"/> Cultural and Historic Resources    | <input type="checkbox"/> Public Access                                  |
| <input checked="" type="checkbox"/> Dam Removal – <i>NO</i> | <input checked="" type="checkbox"/> Public Safety                       |
| <input checked="" type="checkbox"/> Economics               | <input type="checkbox"/> Recreation                                     |
| <input type="checkbox"/> Environmental                      | <input checked="" type="checkbox"/> Sediment/Water Quality/Water supply |
| <input type="checkbox"/> Future Use                         | <input type="checkbox"/> Social concerns                                |
| <input checked="" type="checkbox"/> Flooding                | <input checked="" type="checkbox"/> Study scope                         |
| <input checked="" type="checkbox"/> Hydropower              | <input type="checkbox"/> Other (please specify)                         |
| <input checked="" type="checkbox"/> Invasive Species        |   |
| <input checked="" type="checkbox"/> Navigation              |   |

[illegible]



In addition to the above topics, the Study Team would appreciate your input to the following:

1. How can we maintain/improve the human environment at Upper St. Anthony Falls lock?

*COE SHOULD CONTINUE TO OPERATE USAF*

2. How can we maintain/improve the natural environment at Upper St. Anthony Falls lock?

*COE SHOULD CONTINUE TO OPERATE USAF*

3. How can we maintain/improve recreational opportunities at Upper St. Anthony Falls lock?

*COE SHOULD CONTINUE TO OPERATE USAF*

Comments can be handed in during the meeting, mailed to the address shown, or emailed to [MplsLocksDisposition@usace.army.mil](mailto:MplsLocksDisposition@usace.army.mil). We would appreciate your comments by October 20, 2019.

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US Army Corps of Engineers  
180 5th St. East, Suite 700  
St. Paul, MN 55101-1678  
Attn: N. Bischoff (PM-B)



## Upper St. Anthony Falls Lock Disposition Study Public Meeting Comment Sheet - August 2019

Persons submitting comments are advised that all comments received will be available to the public, to include the possibility of posting on a publicly accessible website. Commenters are requested not to include personal privacy information, such as home addresses, in their comments unless they do not object to such information being made available to the public. These comments will be used to prepare a preliminary draft Disposition study report and environmental scoping document, in accordance with the National Environmental Policy Act.

Name: \_\_\_\_\_ affiliation (optional): Mpls Resident

Please provide your Zip Code: 55418

Please check the category/ies below that best represent the nature of your comment/s [Check all that apply]:

- |   |   |
|---|---|
| <input type="checkbox"/> Communication/Coordination                 | <input type="checkbox"/> Ownership                                      |
| <input checked="" type="checkbox"/> Cultural and Historic Resources | <input type="checkbox"/> Public Access                                  |
| <input type="checkbox"/> Dam Removal                                | <input type="checkbox"/> Public Safety                                  |
| <input type="checkbox"/> Economics                                  | <input type="checkbox"/> Recreation                                     |
| <input checked="" type="checkbox"/> Environmental                   | <input checked="" type="checkbox"/> Sediment/Water Quality/Water supply |
| <input type="checkbox"/> Future Use                                 | <input type="checkbox"/> Social concerns                                |
| <input type="checkbox"/> Flooding                                   | <input type="checkbox"/> Study scope                                    |
| <input type="checkbox"/> Hydropower                                 | <input type="checkbox"/> Other (please specify)                         |
| <input checked="" type="checkbox"/> Invasive Species                |   |
| <input type="checkbox"/> Navigation                                 |   |

I would love to see the waterfall as it was before humans changed it. I know this probably won't happen. So the next best thing is to bring in native plantings, eliminate invasive species and maintain good to excellent water quality for everyone in the metro and areas along the rivers flow.

Our most important challenge is keeping the water potable. If that means telling people/businesses NO then that is what should be done. Humans have done too much damage to nature and it's past time to rein ourselves in, quite expanding and focus on sustaining and stewardship.

(The Red River project is a huge example of what not to do. Move the people not the River.)

In addition to the above topics, the Study Team would appreciate your input to the following:

1. How can we maintain/improve the human environment at Upper St. Anthony Falls lock?
2. How can we maintain/improve the natural environment at Upper St. Anthony Falls lock?  
*Use native plantings wherever possible with educational information.*
3. How can we maintain/improve recreational opportunities at Upper St. Anthony Falls lock?

Comments can be handed in during the meeting, mailed to the address shown, or emailed to [MplsLocksDisposition@usace.army.mil](mailto:MplsLocksDisposition@usace.army.mil). We would appreciate your comments by October 20, 2019.

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US Army Corps of Engineers  
180 5th St. East, Suite 700  
St. Paul, MN 55101-1678  
Attn: N. Bischoff [PM-B]



## Upper St. Anthony Falls Lock Disposition Study Public Meeting Comment Sheet - August 2019

Persons submitting comments are advised that all comments received will be available to the public, to include the possibility of posting on a publicly accessible website. Commenters are requested not to include personal privacy information, such as home addresses, in their comments unless they do not object to such information being made available to the public. These comments will be used to prepare a preliminary draft Disposition study report and environmental scoping document, in accordance with the National Environmental Policy Act.

Name: [REDACTED] affiliation (optional): \_\_\_\_\_

Please provide your Zip Code: 55401

Please check the category/ies below that best represent the nature of your comment/s [Check all that apply]:

- |   |  |
|---|--|
| <input type="checkbox"/> Communication/Coordination                 | <input type="checkbox"/> Ownership                           |
| <input checked="" type="checkbox"/> Cultural and Historic Resources | <input checked="" type="checkbox"/> Public Access            |
| <input type="checkbox"/> Dam Removal                                | <input checked="" type="checkbox"/> Public Safety            |
| <input checked="" type="checkbox"/> Economics                       | <input checked="" type="checkbox"/> Recreation               |
| <input checked="" type="checkbox"/> Environmental                   | <input type="checkbox"/> Sediment/Water Quality/Water supply |
| <input checked="" type="checkbox"/> Future Use                      | <input type="checkbox"/> Social concerns                     |
| <input checked="" type="checkbox"/> Flooding                        | <input type="checkbox"/> Study scope                         |
| <input type="checkbox"/> Hydropower                                 | <input type="checkbox"/> Other (please specify)              |
| <input type="checkbox"/> Invasive Species                           | _____  |
| <input type="checkbox"/> Navigation                                 |  |

The Corps of Engineers continues to be the best option for maintaining and operating the Upper St. Anthony Falls Lock. It should not be sold or leased or given to any private or corporate entity. The State and city also are not capable of operating or maintaining the lock. It should remain a Federal property with the primary mission of flood control and, when necessary, emergency navigation. The site should not be altered to allow construction of a hydropower plant. If physical facilities are not needed for Corps missions, a long-term use agreement should be made between the Corps and the Minneapolis Parks and Recreation Board to allow the MPRB to incorporate the lock into the now-under-construction WaterWorks Park in some fashion to enhance the visitor recreation and cultural/historical experience as part of the Mill Ruins Park area.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



In addition to the above topics, the Study Team would appreciate your input to the following:

1. How can we maintain/improve the human environment at Upper St. Anthony Falls lock?  
*I like the Park Rangers presence to conduct tours and educate the public about the lock, especially during summer and certain special open house events.*
2. How can we maintain/improve the natural environment at Upper St. Anthony Falls lock?  
*Do not allow construction of hydropower plant on Lock property. This would alter riverflow and negatively impact visitor experience.*
3. How can we maintain/improve recreational opportunities at Upper St. Anthony Falls lock?  
*Continue to teach visitors about the river and the Lock and Dam and their contribution to growth in the area.*

Comments can be handed in during the meeting, mailed to the address shown, or emailed to [MplsLocksDisposition@usace.army.mil](mailto:MplsLocksDisposition@usace.army.mil). We would appreciate your comments by October 20, 2019.

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MINNEAPOLIS MN 553

21 AUG 2019 PM 2 L



US Army Corps of Engineers  
180 5th St. East, Suite 700  
St. Paul, MN 55101-1678  
Attn: N. Bischoff (PM-B)



Public Works  
350 S. Fifth St. - Room 203  
Minneapolis, MN 55415  
TEL 612.673.3000  
[www.minneapolismn.gov](http://www.minneapolismn.gov)

September 6, 2019

U.S. Army Corps of Engineers  
180 5<sup>th</sup> Street East, Suite 700  
Attn: Nanette Bischoff (PM-B)  
St. Paul, MN 55101

**RE: Public Comment on the Water Resources Development Act of 2018  
Sec. 1225. Upper Mississippi River Protection**

Dear Ms. Bischoff:

Thank you for the opportunity to comment on the Disposition Study of the Upper St. Anthony Falls Lock and Dam.

The considerations for the study listed include recreational opportunities, ecosystem health, and a partial disposition of the lock and dam necessary to maintain flood control. We continue to advocate for the maintenance of river elevations necessary to ensure the drinking water supply for the City of Minneapolis as another important consideration.

The upper Mississippi River is the sole source of drinking water for the City of Minneapolis and our wholesale customers -- a population totaling over 500,000 people. Our raw water pump station is located in the upper pool of the St. Anthony Falls Lock and Dam. Failure to maintain sufficient dam pool elevations would materially impact the City's ability to withdraw water from this sustainable source, especially at times of low river flows.

We respectfully request that the maintenance of adequate river elevations necessary for the reliable supply of drinking water for the City of Minneapolis be weighed heavily as a consideration in any final recommendations.

Thank you,

A handwritten signature in black ink, appearing to read "Robin Hutcheson", with a stylized flourish at the end.

Robin Hutcheson  
Director of Public Works

CC:  
Glen Gerads, Director of Water Treatment & Distribution  
Gene Ranieri, Director of Intergovernmental Relations



**From:** [REDACTED]  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Disposition of Upper St. Anthony Falls Lock comments  
**Date:** Wednesday, September 11, 2019 4:31:54 PM

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Hello, I attended the meeting on August 13, 2019.

I would like:

- \* the Lock and Dam to become a park available to everyone. Either given to the City of Minneapolis and the Minneapolis Park system or the National Park Service as part of the Mississippi National River and Recreation Area.
- \* the disposition to be done in the most environmentally friendly way possible.
- \* to require NSP to cooperate with the City or NPS to make this public space work for all citizens and visitor.
- \* all buildings to remain intact.
- \* the highest use to be recreational with public access.
- \* to see a public/private sector partnership to work on making Lock financially sustainable.
- \* the cultural and historic aspects of this land and property to be factors into any design and use decisions.

I do not want:

- \* Crown Hydro to build a hydroelectric plant on this site.
- \* this developed by private developers for private use.

Thank you for your consideration.

[REDACTED]

[REDACTED]





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**SEP 13 2019**

REPLY TO THE ATTENTION OF RM-19J

Nanette M. Bischoff, P.E., Project Manager  
Minneapolis Locks Disposition  
U.S. Army Corps of Engineers  
180 5th Street East, Suite 700  
St. Paul, Minnesota 55101

**Re: Scoping Comments – Disposition of Upper St. Anthony Falls, Minneapolis, Minnesota**

Dear Ms. Bischoff:

The U.S. Environmental Protection Agency received your June 27, 2019 request for comments to inform development of a Draft Environmental Assessment (EA) for the above-referenced project. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

In July, 2018, the St. Paul District, U.S. Army USACE of Engineers (USACE) conducted a series of public meetings concerning a Disposition Study (Study) for three locks and dams operated by USACE: the Upper St. Anthony Falls (USAF), the Lower St. Anthony Falls (LSAF), and Lock and Dam 1 (L&D1). The Study's purpose, as authorized by Section 216 of the Flood Control Act of 1970, is to evaluate these dams to determine if they no longer meet their authorized purpose and whether a recommendation can be made to Congress for deauthorization and disposal. Disposal could include turning these sites over to other entities.

Since July, 2018, the scope of the Study has changed, requiring USACE to prepare a separate study just for USAF. A separate study for LSAF and L&D1 is slated to begin in approximately December 2020.

Disposition studies examine the benefits and costs of continuing to operate Federal projects that are no longer serving their authorized purposes. The navigation operations at USAF ceased on June 9, 2015. Since that time, the lock has been operated only for flood mitigation and visitor tours.

The USAF Disposition Study (Study) will analyze three alternatives: 1) The no action alternative (continue operating USAF as it is presently operated); 2) deauthorize all remaining Federal purposes and dispose of the Federal property according to Federal law; and 3) retain those features of the project required to continue USACE operations for flood mitigation while

deauthorizing and disposing of other features of the project. Additionally, the Study will analyze opportunities to augment the three alternatives by considering measures that: a) maintain or improve the human environment at USAF; b) maintain or improve the natural environment at USAF; and c) maintain or improve recreational opportunities at USAF.

EPA's scoping recommendations are enclosed. We offer recommendations concerning purpose and need, alternatives, and indirect and cumulative impacts analyses. We recognize scoping and other early coordination as an efficient means to resolve potential issues upfront, facilitate accelerated project timelines, inform project decision-making, and improve project outcomes. As such, we appreciate the opportunity to be involved at these early stages of Study development.

Thank you for the opportunity to review this project. When the NEPA document becomes available, please send an electronic copy to Kathy Kowal, the lead NEPA reviewer for this project, at [kowal.kathleen@epa.gov](mailto:kowal.kathleen@epa.gov). Ms. Kowal can be reached at 312-353-5206.

Sincerely,



Kenneth A. Westlake  
Deputy Director, Office of Multimedia Programs  
Office of the Regional Administrator

Enclosure: EPA's Detailed Scoping Comments

CC via email: Nick Utrup, U.S. Fish and Wildlife Service  
Teodor Strat, Federal Energy Regulatory Commission

**EPA'S DETAILED SCOPING COMMENTS CONCERNING THE  
DISPOSITION OF UPPER ST. ANTHONY FALLS  
MINNEAPOLIS, MINNESOTA**

**September 13, 2019**

**Purpose and Need / Alternatives Analysis**

Information provided to EPA indicates three alternatives, will be analyzed, along with opportunities to augment the three alternatives by considering measures which maintain or improve the human or natural environment or recreational opportunities at USAF. The analysis and comparison of alternatives is considered the "heart" of the NEPA process. One of the critical elements of NEPA is that project proponents must assess the feasibility and potential impacts of not only the preferred alternative, but also a range of feasible alternatives. The range of alternatives will be based on the project need and the project purpose.

**Recommendations for the forthcoming NEPA document:**

- Identify and substantiate the purpose and need for the proposed project (e.g., typical problems associated with the USACE assets in question (e.g., costs of operation and maintenance, etc.). The project purpose and need statements should be clear and concise.
- Describe potential changes to operations (e.g., flood mitigation) that could result from each proposed alternative. Consider associated environmental and health impacts categories, such as air quality and noise levels.
- Describe potential constraints of any or all alternatives (e.g., Minneapolis water supply needs; current use for water rescues, flood operations, and maintenance; barrier to Asian Carp movement; assets owned by other entities, etc.).
- Describe potential beneficial opportunities provided by one or more alternatives (e.g., improving or enhancing recreation, etc.).
- Clearly describe and depict area of potential socioeconomic effects, as well as effects natural and cultural resources.
- Clearly indicate why and how the particular range of project alternatives was developed, including what kind of public and agency input was used. In addition, alternatives analysis should explain why and how alternatives were eliminated from consideration. The EA should be clear on what criteria were used to eliminate alternatives, at what point in the process the alternatives were removed, who was involved in establishing the criteria for assessing alternatives, and the measures for assessing the alternatives' effectiveness.
- Explain the rationale for generating, evaluating, and eliminating alternatives. If an alternative is eliminated from further consideration because it "does not meet the purpose and need," the NEPA document must adequately describe how or why that alternative doesn't meet the purpose and need.
- Include a discussion of reasonably-foreseeable effects that changes in climate may have on the project area, including long-term infrastructure. This analysis could help inform analyses of the alternatives that consider the deauthorization of all remaining Federal purposes, the disposal of the Federal property according to Federal law, and the retention of those features in the project area required to continue USACE operations for flood mitigation.
- Include a discussion of past and reasonably-foreseeable future costs of maintaining properties (e.g., continuing to operate flood gates, etc.).



### **Indirect Impacts**

Forthcoming NEPA documentation should include reasonably-foreseeable plans for the USAF site (e.g., Central Riverfront Master Plan identified during scoping meetings) if deauthorization/disposition of the Federal property is selected. EPA acknowledges that future visions will be analyzed under separate NEPA analyses. However, in order for reviewers of the current NEPA study for USAF to understand the breadth and extent of potential future actions for the property, EPA recommends all current visions should be identified and discussed in the forthcoming EA. EPA recognizes that fully-designed plans are not available at this time; however, we encourage inclusion of all available information.

### **Recommendations for the forthcoming NEPA document:**

- Describe and visually depict reasonably-foreseeable development concepts (e.g., hydropower, River restoration, Central Riverfront Master Plan, Water Works concept, Friends of the Lock and Dam and VJAA, etc.).
- Discuss whether and how the visions depend on USACE retaining property and/or sharing the site.

### **USEPA Databases**

The following databases can provide environmental information about the project area:

- EnviroMapper<sup>1</sup>: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>
- Envirofacts<sup>2</sup>: <https://www3.epa.gov/enviro/facts/multisystem.html>
- EJSCREEN: <https://www.epa.gov/ejscreen>
- NEPAassist: <https://www.epa.gov/nepa/nepassist>
- Clean Water Act 303(d) Listed Impaired Waters: <https://www.epa.gov/exposure-assessment-models/303d-listed-impaired-waters>

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<sup>1</sup> The **Watershed Assessment, Tracking & Environmental Results System (WATERS)** unites water quality information previously available only from several independent and unconnected databases.

<sup>2</sup> Includes enforcement and compliance information.



October 17, 2019

**U.S. Army Corps of Engineers**

Project Management  
Minneapolis Locks Disposition  
180 5th St. E., Suite 700  
St. Paul, MN 55101

Dear Nan Bischoff,

Thank you for the opportunity to provide comments to the US Army Corps of Engineers about the disposition study for the Upper Lock. As a hospitality trade organization charged with attracting visitors, conventions and trade shows to the region, Meet Minneapolis has a vested interest in the ongoing preservation and activation of the Upper Lock site.

The Mississippi River is an incredible resource for our community and serves as an attraction to our visitors. To better draw these visitors to the Upper Lock, the Corps should make recommendations that enable future uses to improve the human environment by transforming underutilized property into additional economic and cultural assets, thus creating a world class destination. Additionally, we encourage the Corp to consider the opportunity to enhance the natural environment at the Upper Falls through environmental restoration and water stewardship.

Initiatives to activate the waterfront are ongoing and dynamic, as such, the Corps should work with the City and its partners, including the National Park Service and the Park Board, to ensure that any proposed disposition would support and enhance anticipated riverfront improvements, including access to trails surrounding the Upper Lock, fishing opportunities and other waterfront activation, water access and docking opportunities, and planned park development.

Finally, we ask that the Corps conduct the disposition study as expeditiously as possible so that the community and visitors alike can begin to truly experience all that the river has to offer.

Sincerely,

A handwritten signature in black ink that reads "Melvin Tennant". The signature is fluid and cursive, with a large, stylized 'M' and 'T'.

Melvin Tennant  
President & CEO

cc: Mark Andrew, President, Friends of the Lock and Dam  
Kjersti Monson, Director of The Falls Initiative, Friends of the Lock and Dam



Intergovernmental Relations  
 350 S. Fifth St. - Room 301M  
 Minneapolis, MN 55415  
 TEL 612.673.3000  
[www.minneapolismn.gov](http://www.minneapolismn.gov)

October 17, 2019

VIA EMAIL U.S. Army Corps of Engineers  
 180 5th St. E., Suite 700  
 St. Paul, MN 55101  
 Attn: District Engineer, [MplsLocksDisposition@usace.army.mil](mailto:MplsLocksDisposition@usace.army.mil)

The Mississippi River (River) has been a major influence in the settlement and development of the City of Minneapolis. The River in Minneapolis has been a means for transportation, power generation, commercial and industrial development and a drinking water source for the City's businesses and residences. The closure in 2016 of the Upper St. Anthony Lock (Lock) to commercial navigation and the planned conversion of the City-owned Upper Harbor Terminal to other uses has initiated discussion regarding the future of the Upper St. Anthony Falls Lock (Lock) and its effect on the River.

The City in cooperation with the Minneapolis Parks and Recreation Board (Park Board) is actively engaged with community residents and a development team to develop plans for the reuse of the 48-acre Upper Harbor site. It is anticipated that construction at the site could begin within two years. In addition to the Upper Harbor project the Park Board has several projects along the River that should start development soon.

The area below the Lock has experienced significant development over the past decade. The development has created a residential neighborhood interspersed with parks, trails, and cultural and historic sites that have been preserved and protected. A similar approach is being contemplated for the area above the Lock. The City appreciates the opportunity to comment on the proposed disposition study that should be completed in 2020. The following comments are offered for your consideration.

#### **Public Use: Recreation and Public Access to the River**

The study should consider the changing uses of the area around the river to include and foster recreation. Areas both above the falls and below the falls have recreational activities that residents and visitors engage in, and those opportunities will only grow as more recreational areas are provided as part of the Minneapolis Park Board's plans. The river is transitioning from an industrial setting to a recreational setting with activities and hospitality that will have the potential to draw large numbers of residents and visitors to the area. The future use of the lock should support recreation activities.

#### **Historical Connections**

The area's historic preservation and interpretation connections between the overall "Upper Harbor" area and the Lock which opened the Upper Harbor segment to navigation should be part of the study Corps' scope. A 2007 study found that a potential Upper Harbor historic district which includes the Lock is eligible for the National Register of Historic Places. The impact on this potential historic district of disposition and any resulting changes to the Lock should be considered in the disposition study, as should the potential for interpretation of this history at the Lock and within the overall Upper Harbor area.



October 17, 2019

## **Development**

The partial disposal could lead to development on and near the Lock property to be disposed. The study's recommendations regarding development should be consistent with the relevant guidance in all adopted plans that will be impacted by the Corps' recommendation and actions, including, but not limited to, Minneapolis 2040, the Mississippi River Critical Area Corridor Plan, the Minneapolis Park and Recreation Board's Central Mississippi Riverfront Regional Park and Above the Falls Regional Park Master Plans, and the St. Anthony Falls Historic District Design Guidelines and official actions related to the lock and impacted area.

## **Pool Above the Lock**

The study should analyze what the effect of not maintaining the channel or not dredging will have on the depth and condition of the pool, the City of Minneapolis' water supply, and the risk of flooding. Located along the Mississippi River, the City's drinking water treatment plant supplies drinking water to not only Minneapolis, but also to all or portions of seven suburban cities. The cities include Golden Valley, Crystal, New Hope, Columbia Heights, Hilltop, Bloomington and the Morningside neighborhood of Edina. The City also supplies drinking water to the University of Minnesota Twin Cities and the Minneapolis-St. Paul International Airport. Approximately 38% of the average 57.0 million gallons of drinking water produced daily are for commercial, industrial and institutional uses. The retention of the pool above the lock is vital to protect the City's water supply, especially under low river flow conditions.

## **Partial Disposition of the Lock**

The study should consider that a partial disposition would continue the Corps' flood control responsibility and provide an assurance that the pool above the Lock is sufficient to serve as the drinking water source for the City and the Minneapolis-St. Paul International Airport and the suburbs.

The study recommendations regarding development of the Lock should be consistent with not only with the City and Park Board official plans noted in the **Development** section but also with policy positions of the City and Park Board related to the development of the area and opposition to a hydro-power plant within the area of the Lock. The Minneapolis City Council resolution addressing both development at the Lock and adjacent area and opposition to a hydro-facility can be accessed at [https://lims.minneapolismn.gov/Download/MetaData/6913/2018-00319%20Res%20098 Id 6913.pdf](https://lims.minneapolismn.gov/Download/MetaData/6913/2018-00319%20Res%20098%20Id%206913.pdf)

The resolution states the City's opposition to any hydroelectric generating facilities on the Lock. The resolution also states that the City will work with representatives of the Friends of the Lock and Dam, the Army Corps and other interested parties to examine options to implement the Falls Initiative.

The study should also consider continued access for water rescue boats operated by the Minneapolis Fire Department and the Hennepin County Sheriff. The access will be vital as the upper River becomes available for recreational use.

If you have any questions or need additional information, please contact me.

Sincerely,



Gene Ranieri, Director  
Intergovernmental Relations



IN REPLY REFER TO

## United States Department of the Interior

NATIONAL PARK SERVICE  
Mississippi National River and Recreation Area  
111 E. Kellogg Blvd., Ste 105  
St. Paul, Minnesota 55101-1256

District Engineer  
St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environment Division North  
180 Fifth Street East  
St. Paul, Minnesota 55101-1638

18 October 2019

Dear Colonel Jansen:

Please find attached the Mississippi National River and Recreation Area's (NRRA) comments on the "Disposition Study for the Upper St. Anthony Falls Lock and Dam, Minneapolis, Minnesota." The NRRA is a unit of the National Park Service that runs with the Mississippi River for 72 miles through the Twin Cities metropolitan area. Rather than repeat our comments on the "Scoping for the Upper St. Anthony Falls Lock and Dam, Lower St. Anthony Falls Lock and Dam, and Lock and Dam 1 Disposition Study" submitted on August 20, 2018, I have attached the original cover letter and comments. The overall context and many of the specific comments apply, although I recognize that the disposition study of the Lower St. Anthony Falls Lock & Dam and Lock & Dam No. 1 will not begin until next year. In this letter, I address the three principal alternatives for the Upper St. Anthony Falls (USAF) Lock, associated lands and related infrastructure.

St. Anthony Falls ranks among the Mississippi River's most important sites. It is the Great River's only major waterfall. Historically, explorers, painters and writers made the falls a national and international landmark. St. Anthony gave birth to the timber and flour milling industries that drove the Minneapolis and regional economies. Minneapolis led the nation and at times the world in flour milling from 1880 to 1930. For these reasons, the falls anchors the St. Anthony Falls National Register of Historic Places Historic District. This district features two National Historic Landmarks and one National Civil Engineering Landmark. The Upper St. Anthony Falls Lock itself is eligible for the National Register as a key part of the river's story. St. Anthony Falls and many of the resources surrounding it are of national significance and, therefore, especially important to the Mississippi NRRA.



## **No Action**

The Corps needs to clearly define what it means by No Action. The Corps public presentation for this study states that the Corps will:

Continue to operate the flood gate as needed. Continue to allow agreements with the National Park Service to conduct tours at the site. Continue maintenance as needed to preserve the flood gate operation. While the navigation mission and the 9-foot channel will continue to be authorized, the low priority for dredging will continue due to lack of demand. Unless otherwise directed, under the no action alternative the lock would remain closed to all navigation.

What the Corps does not address is the level of maintenance it will conduct for the USAF Lock and related infrastructure. There should also be a statement that says: “Continue maintenance as needed to fully facilitate visitor use and enjoyment.” Since the Corps has a recreation mission at the USAF Lock, this is justified and needed, given the great increase in visitation and even greater potential. The USAF Lock saw 25,587 visitors in 2019, and the NRRA and our partners hope to grow that number next year. This level of visitation demands adequate maintenance for the visited portions of the site to a degree that the Corps maintained them before the lock closed. Our concern is that without a committed level of funding needed to maintain the lock’s appearance and overall upkeep at it was as of June 9, 2015, there will be a gradual and steady deterioration of the site. Visitors to Corps and National Park Service sites expect professionally maintained facilities, and it would reflect poorly on both if we did not meet those expectations.

The Willamette River disposition study defines the No Action as the “Status Quo Alternative (No Action)” and says this means the Corps will “maintain the current caretaker status. Minimal maintenance activities of the facility shall continue and repairs would be conducted on an “as needed” basis ....” Such an approach to the USAF Lock would lead to a steady deterioration. Again, given the number of visitors coming to this site and its prominent location in downtown Minneapolis this would be unacceptable.

## **Cultural and Historical Resources**

The USAF Lock has been determined eligible for the National Register of Historic Places. Section 106 of the National Historic Preservation Act considers neglect an adverse effect. If the No Action alternative leads a steady decline in maintenance, this could constitute an adverse effect. The Corps will need to address this matter in its evaluation. As the USAF Lock lies at the center of the St. Anthony Falls National Register Historic District, visible deterioration of the lock and related infrastructure could also impact the historic district.

## **Scenic Quality**

The USAF Lock’s location makes highly visible to millions of people. The St. Anthony Falls area has received over two billion dollars of investment over the past several decades, and the pace of investment is accelerating. Nearly three million people visit the

St. Anthony Falls each year. The lock's condition could detract from the area's scenic and economic values if allowed to deteriorate.

### **Disposal**

*Alternative 2 –Deauthorize the navigation, recreation and flood mitigation missions at USAF and dispose of the entire federal project, including the lock structure, all lands, buildings, and property and portions of the 9-foot channel maintained by the Corps.*

- *Consider structural removal prior to disposal.*
- *Consider disposal without structural removal.*

Disposal of the USAF Lock would have significant consequences for the Mississippi NRRA. If the lock leaves federal ownership, the NRRA will lose the special provisions and oversight granted to the park in its authorizing legislation, including Sec. 704. This section provides that:

Before any department, agency, or instrumentality of the United States issues or approves any license or permit for any facility or undertaking with in the Area and before any such department, agency, or instrumentality commences any undertaking or provides any Federal assistance to the State or any local governmental jurisdiction for any undertaking within the Area, the department, agency, or instrumentality shall notify the Secretary.

This section mandates timelines and a recourse with Congress, if necessary, for the NRRA that non-federal entities would not have to honor, if there was no federal tie to their action. So, disposal could diminish key protections for the seven resource types Congress directed the NRRA to protect and enhance. The NPS needs assurance that its ability to protect and enhance these seven resource types will not be lost or weakened by disposal. Consequently, the NRRA could need language in any transfer of the lock, associated lands and infrastructure out of federal control that ensures a high level of review by the NRRA similar to what it has now. As an example, the NPS's historic monuments program, under which historic properties are transferred out of federal control, provides such protections.

### **Cultural and Historical Resources**

If the USAF Lock is transferred out of federal ownership, we expect that the Section 106 review process would lead to a Memorandum of Agreement, under Section 106 of the National Historic Preservation Act, that would provide for a comparable level of review and protection to that had the sites remained under federal ownership for Section 106 matters. If this does not happen, then the Mississippi NRRA will lose a critical review authority, and its ability to protect and enhance the site and area's significant qualities will be diminished.



We assume that if the Corps decided to remove any portion of the USAF Lock prior to disposal, the Corps would undertake the required Section 106 and other environmental reviews needed.

### Recreation

If the Corps disposed of the USAF Lock to an entity that ended or greatly reduced visitor access, this would adversely affect the visitor experience for local, national and international visitors. A new owner could also preclude the Minneapolis Park and Recreation Board from fully implementing plans for its Water Works park development. Friends of the Lock and Dam's proposal anticipates creating a robust visitor experience at the USAF Lock that would bring in hundreds of thousands of visitors. This experience includes providing access to the channel between the guidewall above the falls and the western shore. If a new entity restricted access to this channel, it could greatly limit the visitor experience for those using the amenities at Water Works or coming to a new visitor center at the lock. Thus, the Corps should give priority to opportunities that continue and expand visitor access to the lock, associated lands and related infrastructure.

### Scenic Quality

New uses of the USAF Lock could adversely affect the scenic qualities of the St. Anthony Falls area and could adversely affect the St. Anthony Falls Historic District as well. The Corps should consider opportunities that do not diminish the scenic or historic qualities of the area.

### Direct, Indirect and Foreseeable Impacts

NPS guidance on the National Environmental Policy Act (NEPA) states that "Courts have applied what is known as the "hard look" standard in deciding whether or not an agency has fully complied with the environmental analysis requirements of NEPA. This means that there must be evidence that the agency considered all foreseeable direct, indirect, and cumulative impacts; used sound science and best available information; and made a logical, rational connection between the facts presented and the conclusions drawn." (NPS NEPA Handbook Supplemental Guidance). If the Corps recommends disposal, then the Corps should evaluate all foreseeable impacts.

### **Partial Disposal**

*Alternative 3 – Retain those features of the project that are necessary for flood mitigation, while disposing of property and features not needed for flood mitigation. This could include deauthorization of the navigation mission at USAF, and deauthorization of the 9-foot channel upstream of USAF.*

Partial disposition is consistent with the language of WRDA 2018, which directs the Corps study to include a plan for "a partial disposition of the Upper St. Anthony Falls Lock and Dam facility and surrounding real property that preserves any portion of the Upper St. Anthony Falls Lock and Dam necessary to maintain flood control..." (Section

1225 (d)(2) of WRDA 2018.) This alternative is also consistent with the Congressional intent as stated by Senators Amy Klobuchar and Tina Smith to the Corps in their letter of January 8, 2019. Per the above, the Corps should work with the City, Friends of the Lock & Dam and others to transfer the elements not needed for flood mitigation to the public entity most capable of repurposing the lock, associated land and infrastructure for the best results for the human environment, ecosystem and recreational opportunities.

For partial disposal, our comments above on disposal apply to those elements the Corps would dispose of. For those elements the Corps would retain, we assume it would conduct any necessary Section 106 or other environmental reviews needed for any work the Corps undertook on the elements it retained.

Partial disposal could enhance the USAF Lock's visitor use and enjoyment, making it available to far more visitors and in far more ways than exist today. So, those opportunities that offer the greatest benefit in this regard and do so in ways that protects the overall character of the site, the St. Anthony Falls Historic District and the scenic qualities of the area should be favored over any that do not.

Overall, the lock and related lands and infrastructure could be repurposed for visitor access where that access does not interfere with flood mitigation management by the Corps. The USAF Lock, surrounding land and related infrastructure offer a spectacular opportunity to view St. Anthony Falls and to get near it and the Mississippi River. Mill Ruins Park, Mill City Museum and the Stone Arch Bridge together already draw millions of visitors every year. With the plans for Waterworks Park on the West, the river's west bank will be seeing even more visitors. Together, all these sites will provide the USAF Lock with a guaranteed stream of visitors.

For those portions of the lock, related real estate and infrastructure that the Corps does not consider retaining, the Mississippi NRRRA recommends:

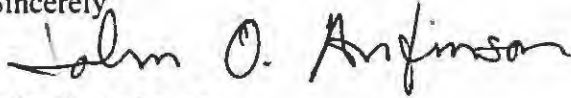
- Transferring or selling those portions to an entity that will use such space and infrastructure for recreation purposes, including visitor use and enjoyment.
  - The main parking lot provides an opportunity to build a new structure that could serve recreation and human uses, such as education and interpretation and other amenities for visitor use and enjoyment.
  - The parking area and berm downstream of the restroom to the end of the lock structure and Stone Arch Bridge could also be used as described in the preceding bullet point.
  - Any new structure must be done at a scale and such a way that it does not cause adverse effects to the St. Anthony Falls Historic District, the Stone Arch Bridge National Engineering Landmark, the USAF Lock as an eligible historic site or the critical viewsheds of the St. Anthony Falls area.
- Remodeling or repurposing some spaces within the lock structure for better staff and visitor use while preserving essential aspects of historic character. Such spaces include the:
  - Office/lunch room
  - Restrooms/locker rooms

- Lower Control Stand
- Garage
- And other such spaces
- Providing safe and easy access to the entire lock surface, interior of lock, green space below outer lock wall, guidewalls, outdraft barrier, backwater between the inner upstream guidewall and west bank, and upstream dolphins.
  - Lock surface
    - Install appropriate fencing, matching the site's historic character, on entire lock. Get rid of barbed wire.
  - Lock interior
    - Allow tours of tunnels inside the lock, recognizing access issues for some individuals.
  - Green space below outer lock wall
    - Clarify ownership. Corps slides from its public presentation show some of this area as Corps fee title land but not a Corps structure. What ownership or authority does the Corps have for this land? From historic photographs, it appears this lands was part of the coffer dam built for the lock's construction.
    - If the Corps does not have title or authority over this land, it could work with Xcel and other partners to gain access and help
      - Repair the stairs
      - Provide safety railings
      - Provide handicap access
      - Undertake ecological restoration and build a path through the restored green space that brings visitors to the river's edge, where they can see, hear and feel the power of St. Anthony Falls.
  - Guidewalls up and downstream
    - Provide necessary safety fencing to entire length of all the guidewalls and offer access for visitors to walk out on them, either by themselves or with a interpretive staff member.
  - Outdraft barrier
    - Provide access to the concrete portions of this structure, with adequate safety fencing
  - Land between USAF Lock and LSAF Lock
    - Provide public access to the road connecting the two locks to create a better circulation pattern for visitation at the USAF Lock and, possibly, the LSAF Lock.

To facilitate the above recommendations, the Mississippi NRRA believes affirming and expanding the Corps' recreation mission under this alternative, especially for whatever portions of the site it would retain, is important. Taking advantage of this opportunity could provide the Corps with a great public relations tool.

If you have any questions, please contact me at [john\\_anfinson@nps.gov](mailto:john_anfinson@nps.gov) or 651-293-8432.

Sincerely

A handwritten signature in black ink that reads "John O. Anfinson". The signature is written in a cursive style with a large, stylized "J" and "A".

John O. Anfinson  
Superintendent





IN REPLY REFER TO

## United States Department of the Interior

NATIONAL PARK SERVICE  
Mississippi National River and Recreation Area  
111 E. Kellogg Blvd., Ste 105  
St. Paul, Minnesota 55101-1256

District Engineer  
St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environment Division North  
180 Fifth Street East  
St. Paul, Minnesota 55101-1638

20 August 2018

Dear Colonel Calkins,

Please find attached the Mississippi National River and Recreation Area's comments on the "Scoping for the Upper St. Anthony Falls Lock and Dam, Lower St. Anthony Falls Lock and Dam, and Lock and Dam 1 Disposition Study." In this cover letter, I address the special context of these locks and dams and of the Mississippi River in the Twin Cities, for these locks and dams do not lie in just any reach of any river. They lie in a unique and very special reach of the nation's greatest river.

St. Anthony Falls ranks among the Mississippi River's most important sites. It is the Great River's only major waterfall. Historically, explorers, painters and writers made the falls a national and international landmark. St. Anthony gave birth to the timber and flour milling industries that drove the Minneapolis and regional economies. Minneapolis led the nation and at times the world in flour milling from 1880 to 1930. For these reasons, the falls anchor's the St. Anthony Falls National Register of Historic Places Historic District. This district features two National Historic Landmarks and one National Civil Engineering Landmark. The Upper St. Anthony Falls Lock itself is eligible for the National Register as a key part of the river's story. The St. Anthony Falls area has received well over two billion dollars of investment over the past several decades, and the pace of investment is accelerating.

Lower St. Anthony Falls Lock and Dam and Lock and Dam No. 1 lie in the reach locally referred to as the "Gorge." The Gorge stretches 8.5 miles, from St. Anthony Falls to the mouth of the Minnesota River. Nowhere on the Mississippi does the river drop so quickly over such a short distance and through such a narrow canyon. From above St. Anthony Falls to the Minnesota River, the Mississippi plummets 110 feet. The bluffs are 80 to 100 feet high and only one-quarter to one-third of a mile apart. Before the locks and dams, turbulent rapids rushed through the gorge at high water. At low flows, the Gorge became a shallow stream filled with sand, gravel and rock bars. Parkways now define both sides and are part of the Grand Rounds National Scenic Byway, drawing millions of people every year to scenic and recreational amenities.

Congress established the National Park Service by the Organic Act of 1916 with the mission "...to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." I recognize that St. Anthony Falls and the Gorge lie within the heart of the river's largest metropolitan area and are hardly unimpaired. Our authorizing legislation takes this into account but is still anchored to the 1916 Organic Act.

While the National Park Service manages other units on the Mississippi River, the Mississippi National River and Recreation Area (NRRRA) is the only one whose mission and focus is the Great River. We are the Mississippi River's National Park. Whatever the outcomes of the Corps Disposition Study, they will impact this National Park Service unit. So, the NRRRA has a special interest and stake in the Disposition Study.

Congress established the NRRRA in 1988 with the direction "To protect, preserve and enhance the significant values of the waters and land of the Mississippi River Corridor within the Saint Paul-Minneapolis Metropolitan Area." Congress emphasized that "There is a national interest in the preservation, protection and enhancement of these resources for the benefit of the people of the United States." The NRRRA, therefore, has a responsibility to the American people to ensure any future actions protect, preserve and enhance the significant values here. This is a national conversation, not just local, which is why organizations like the National Parks Conservation Association and American Rivers are weighing in.

As the history behind the NRRRA's creation demonstrates, the State of Minnesota is also committed to protecting, preserving and enhancing the resources of the Mississippi River through the Twin Cities. In 1973, the State passed the Critical Areas Act to protect areas with exceptional historic, cultural, or aesthetic values or natural systems. Three years later, Democratic Governor Wendell Anderson established a 72-mile stretch of the Mississippi River, including a 4-mile reach of the Minnesota River, and the adjoining lands in the Twin Cities metropolitan region as the state's first critical area. In 1979, Republican Governor Albert Quie extended the Mississippi River Corridor Critical Area designation (E.O. 17-19), and the Metropolitan Council (Resolution 79-48) made the designation permanent the same year.

When Congress established the NRRRA in 1988, it used the same boundary as the Critical Area and did not mandate new rules and regulations. Instead, the State agreed to ensure protection of the significant resources through State laws and regulations. In a key step honoring that agreement, the Minnesota Legislature designated the NRRRA a State Critical Area in 1991. Further binding the NRRRA to the Mississippi River Corridor Critical Area, the Mississippi River Coordinating Commission (1994), Minnesota Governor Arne Carlson (1994) and Secretary of the Interior Bruce Babbitt (1995) signed the NRRRA's Comprehensive Management Plan.

I need to make one final, compelling point for why it is paramount the Corps carefully consider its conclusions and recommendations for the Disposition Study. From their founding in the mid-nineteenth century, Minneapolis and St. Paul began shaping the Mississippi River for navigation and hydropower through the Corps of Engineers and private entities. For the first time since then, there is opportunity to consider a new relationship with the river. The study's outcome will likely shape the river in the Twin Cities for generations to come.

As the above background shows, the Mississippi River through the Twin Cities is of exceptional importance to the nation, State and local communities. Consequently, we have high expectations for a deep and broad analysis to help the American people understand all that No Action, Deauthorization and Disposition could mean. Individual interests will advocate for preserving or

protecting a particular stake or aspect of the Mississippi River tied to one or more of the locks and dams. The NRRA, however, must consider all seven resources identified by Congress in our authorizing legislation and assess the overall benefits or losses of any particular action or recommendation by the Corps.

For the NRRA to fully and fairly do this, we need the Corps to thoroughly respond to the questions we ask and the concerns we raise in our attached comments, as well as to those asked and raised by other interests. We will be available at any time during your analysis to help in whatever way we can.

If you have any questions, please contact me at [john\\_anfinson@nps.gov](mailto:john_anfinson@nps.gov) or 651-293-8432.

Sincerely,

A handwritten signature in black ink that reads "John O. Anfinson". The signature is written in a cursive, flowing style.

John O. Anfinson  
Superintendent

**St. Paul District, Corps of Engineers**  
**Twin Cities Locks and Dams Disposition Study**  
**Mississippi National River and Recreation Area Comments**  
August 20, 2018

**Mississippi National River and Recreation Area Resources**

The Act establishing the Mississippi National River and Recreation Area (NRRA) on November 18, 1988, (Public Law 100-696) explains why Congress created the park and defines what the National Park Service (NPS) needs the Disposition Study to address.

**TITLE VII – MISSISSIPPI NATIONAL RIVER AND RECREATION AREA, Subtitle A – Mississippi National River and Recreation Area, FINDINGS AND PURPOSES**

- **Sec. 701 (a) FINDINGS.** – Congress finds that:
  - The Mississippi River Corridor within the Saint Paul-Minneapolis Metropolitan Area represents a nationally significant historical, recreational, scenic, cultural, natural, economic, and scientific resource.
  - There is a national interest in the preservation, protection and enhancement of these resources for the benefit of the people of the United States.
- **Sec. 701 (b) PURPOSES.** – The purpose of this subtitle are:
  - To protect, preserve and enhance the significant values of the waters and land of the Mississippi River Corridor within the Saint Paul-Minneapolis Metropolitan Area.

To adequately evaluate the potential impacts of the No Action and Deauthorization/Disposal alternatives at the Upper St. Anthony Falls Lock, Lower St. Anthony Falls Lock and Dam and Lock and Dam No. 1, the Corps needs to identify and assess the potential impacts to the seven resource types identified in Sec. 701(a).

Because these resources are of national significance, the NRRA’s authorizing legislation also states:

- **Sec. 704 (b) FEDERAL AGENCY ACTIVITIES**
  - (1) **IN GENERAL.** — Before any department, agency, or instrumentality of the United States issues or approves any license or permit for any facility or undertaking within the Area and before any such department, agency, or instrumentality commences any undertaking or provides any Federal assistance to the State or any local governmental jurisdiction for any undertaking within the Area, the department, agency, or instrumentality shall notify the Secretary. The Secretary shall review the proposed facility or undertaking to assess its compatibility with the plan approved under section



703. The Secretary shall make a determination with respect to the compatibility or incompatibility of a proposed facility or undertaking within 60 days of receiving notice under this subsection. If the Secretary determines that the proposed facility or undertaking is incompatible with the plan, he shall immediately notify such Federal department, agency, or instrumentality and request such department, agency, or instrumentality to take the actions necessary to conform the proposed facility or undertaking to the plan. The Federal department, agency, or instrumentality shall, within 60 days after receiving the Secretary's request, notify the Secretary of the specific decisions made in response to the request. To the extent that such department, agency, or instrumentality does not then conform such facility or undertaking to the request of the Secretary, the Secretary is directed to notify the Congress in writing of the incompatibility of such facility or undertaking with the plan approved under section 703.

### **The Seven Resource Types – A Brief Description**

The descriptions of the seven resource types below are not comprehensive but should give the Corps a good idea of what they need to consider. We recognize that positive impacts to one type of resource could negatively affect another. The Mississippi National River and Recreation Area Comprehensive Management Plan (CMP), developed in accordance with Sec. 703 (i), provides “a general framework to coordinate natural, cultural, and economic resource protection, visitor use, and development activities” (CMP, General Concept, p. 11). It details policies and actions for seven resource types that contribute to the significance of the area, but it distinctly “recognizes the national significance of the Mississippi River as a natural riverine ecosystem.” In doing so, the CMP states that “fish and wildlife resources, including bottomland forests, bluffland, and riverine habitats will receive greater protection” (CMP p. 12). We will look at all the impacts, however, and weigh the overall effects. (For a copy of the CMP see <https://www.nps.gov/miss/learn/management/lawsandpolicies.htm> or contact the park.)

Economic Resources. The NPS focuses on economic uses of the corridor consistent with the values for which the area was established. Commercial barge shipping, tour boats, marinas, recreation, tourism and hydroelectric power generation fit this focus. The park's authorizing legislation stresses that the park protect, preserve and enhance those uses and resources of national significance, although we also consider the importance of local and regional significance.

Historical and Cultural Resources. The cultural resources of the area consist of evidence of past activities on or near the river. These include burial mounds, campsites, village sites, and ethnographic resources that illustrate the nature of the occupation by Native Americans. The fur trading period, early settlement, and later urbanization, as well as agricultural and industrial activity on or near the river, are included in historic districts, national historic landmarks, national register properties, and locally designated historic sites. All three lock and dam sites have been determined eligible for the National Register of Historic Places.

Natural Resources. The natural resources of the NRRRA are considered to be the assets or values related to the natural world, such as plants, animals, birds, water, air, soils, geologic features, fossils and scenic vistas. Natural resources are those elements of the environment not created by humans, although they have been affected by human action. The most important natural resource in the corridor is the Mississippi River itself. It is a globally significant riverine ecosystem that must be protected and restored because it serves, in part, as a migratory corridor for wildlife, because it is essential to sustaining the biological diversity of the continent and the natural functions of the numerous aquatic and terrestrial communities of which it is composed, and because it supports the quality of life for the citizens who live and work and play on and near it.

Recreational Resources. The park was specifically designated a Recreation Area. The corridor offers a broad range of recreational and educational experiences closely tied to the character of the resource and complementing other recreational opportunities in the metropolitan area. The variety of passive and active resource-related recreational activities in the Mississippi NRRRA include fishing, hunting, boating, canoeing, rowing, cross country skiing, snowshoeing, hiking, bicycling, jogging, picnicking, taking photographs, birding, and participating in a variety of interpretive and educational programs.

Scientific Resources. Scientific resources have not been defined specifically, but they include resource related issues and research that can provide a better understanding of the Mississippi River's past and potential future. The park's paleontological remains are an example of resources related to research opportunities and education. These remains lie within the bedrock layers of the river's bluffs and date to the Ordovician Period (444 to 488 million years ago). Research on water quality, the river's fish and mussel populations, changing climate conditions on river flow and what the river was like before it was dammed for hydropower and navigation all fit under scientific research that would benefit the river and its resources. (See CMP pg. 29 Resources Management and "scientific research.")

Scenic Resources. The corridor includes many outstanding vistas, areas of scenic beauty, and tranquil places in the midst of a large urban area. Scenic views can vary from an entirely wild and natural looking setting to the cityscapes of Minneapolis, St. Paul and other communities from the Mississippi River.

## **Fundamental Resources and Values**

Every unit of the National Park System develops a Foundation Document to provide basic guidance for planning and management decisions. A primary benefit of developing a foundation document is the opportunity to integrate and coordinate all kinds and levels of planning from a single, shared understanding of what is most important about the park. For its Foundation Document, the Mississippi NRRRA identified the following fundamental resources and values:

- Cultural and historic sites that owe their national significance to their presence along the Mississippi River.

- Economic resources supported by the Mississippi River in the NRRRA that are integral to the nation's economy.
- Collaborative relationships with governments, private sector organizations, non-profits, schools, and individuals that help the park to achieve its purpose.
- Healthy aquatic ecosystems that provide for a rich and diverse assemblage of fish, mussels, macro-invertebrates and other species, as well as the opportunity for scientific study.
- Healthy terrestrial ecosystems that provide for a rich and diverse assemblage of plants and animals, as well as the opportunity for scientific study.
- Birds that rely on the Mississippi River Flyway in the NRRRA to provide nesting, resting and feeding habitat.
- Scenic views that allow people to experience the distinctive landscapes of the NRRRA.
- Outdoor recreation opportunities and experiences that connect visitors with the river and its natural places, its cultural and historic sites and its scenic vistas.
- The presence of bluffs, caves, waterfalls and fossil beds that demonstrate the unique geologic character of the Mississippi River in the NRRRA.
- Water Quality – Clean water that supports human use of the Mississippi River and vibrant ecosystems in the NRRRA.

The NRRRA will be reviewing the Corps Disposition Study and Environmental Assessment with these fundamental resources and values in mind.

### **Site Resources: Land, Infrastructure and Water**

As we understand it, the holdings of the Corps of Engineers at each site include the assets listed below. If we are missing something, please let us know.

- Upper St. Anthony Falls: Lock, guidewalls, outdraft barrier, 15 dolphins, parking lot, and land between lock and spillway.
- Lower St. Anthony Falls: Lock, dam, guidewalls, 3 dolphins, and access roads on each end.
- Lock and Dam No. 1: Locks, dam, guidewalls, bluff retaining walls, road, and land. Does the Corps own the hydroelectric plant powerhouse, just the base or dam portion, or both? We understand the Corps also holds 326 acres of flowage easements in Pool 1.
- Meeker Island Lock and Dam: Did the Corps fully dispose of the Meeker Island Lock and Dam land and infrastructure? The lock ruins are still present along the east bank, the bear traps gates lie on the west side under sand, and the partially demolished dam lies under Pool 1.

In addition to the above resources, the Corps has had the authority and responsibility for the navigation channel. This raises some questions about Pool 1. We recognize that the Upper and Lower St. Anthony Falls pools were the result of hydro power projects. Pool 1, however, is a direct result of the navigation project. The navigation channel is one portion of the pool. Does

the Corps have any long-term responsibility for the pool? Can the Corps walk away without considering the pool or reservoir it would leave behind? What impacts on infrastructure and resources does leaving the pools in place have under deauthorization and disposal? For example, what is the long-term effect of Pool 1 on bridges and other infrastructure through freeze-thaw action?

Since Lock and Dam No. 1 was built before the National Environmental Policy Act, it received no environmental review. In considering the cumulative impact of its alternatives, will the Corps need to consider the natural river as the baseline for determining cumulative impacts?

## **No Action Alternative**

A. Definition of No Action. The Corps needs to clearly define what it means by No Action. The Corps has stated that under the No Action alternative, “the St. Paul District [would] continue to operate the sites as-is.” Does this mean that each site will continue to receive the funding and staff time needed to maintain each in the condition it was as of June 9, 2015, or will funding be used elsewhere, leading to the gradual and steady deterioration of each site? If the Corps prioritizes funding to other locks and dams and to channel maintenance elsewhere, the three sites and navigation channels connecting them will begin to deteriorate. It seems this would constitute a “Phased Reduction of Operation and Maintenance Plan” rather than a No Action Plan. Turning over the visitor center at Upper St. Anthony Falls to the NPS and discontinuing dredging are ways in which the Corps is withdrawing from its historic roles. What else might the Corps discontinue or reduce? We need to know, if we are going to comment on all the effects of a No Action alternative.

The [Willamette River Disposition Study with Integrated Environmental Assessment](#) defines the No Action as the “Status Quo Alternative (No Action),” and says this means the Corps will “maintain the current caretaker status. Minimal maintenance activities of the facility shall continue and repairs would be conducted on “as needed” basis ....” Such an approach to the three sites on the Mississippi River would lead to a steady deterioration.

B. Level of Service. What Level of Service will the Corps use as the basis of the No Action alternative? Level 3 and Level 6 would have substantially different impacts on recreation, economic benefits, natural resources, and, possibly, other resource types identified in the NRRA’s legislation. Unless the Corps specifies one Level of Service that will not change, it may be necessary for the Corps to assess the impacts under two or more levels.

C. Dredging. What effects will no dredging of Pool 1 or the Lower St. Anthony Falls Pool have?

- Economic Resources. What impacts will no dredging have on recreational boating, tour boats and marinas? With no tour boat use, all commercial lockages would end.
- Natural Resources. What habitat changes will occur and with what ramifications for fish, wildlife and mussels? Would islands begin to form in the river? Would sandbars begin extending out into the river, bars that could provide mussel habitat? The August 2007



drawdown of Pool 1 to help with recovery efforts at the 35W Bridge suggests that bars will form and that islands could as well.

- **Recreation.** The channel between Lock and Dam No. 1 and Lower St. Anthony Falls Lock and Dam is already silting in, and there is no continuous 9-foot channel. Without dredging, tour boats and larger pleasure boats may eventually find the river in Pool 1 impassable. These consequences will impact at least two aspects of recreational enjoyment.
- **Safety.** The Coast Guard has not placed channel markers in 2018 in response to the Corps not dredging the channel. This could become a safety issue for tour boats and recreational craft.
- **Potential Future Projects.** How might no dredging affect future actions? For example, as more sediment accumulates behind Lock and Dam No. 1, a dam removal project would have to address the impacts and costs of dealing with more sediment.

D. Other Channel Maintenance. What is the Corps' plan for dealing with logs and debris that become lodged in the former navigation channel immediately above the Upper St. Anthony Falls Lock? What about debris that collects in the Upper St. Anthony Falls lock chamber? What about Lower St. Anthony Falls and Lock and Dam No. 1 if lock use discontinues at either or both?

The buildup of natural and human-related debris could become unsightly and adversely affect the scenic qualities and historical setting at each site. It could also affect recreational use and safety. If the Corps does not manage the debris, some other entity may have to spend funding on it.

E. Cultural and Historical Resources. National Register Structures. All three sites have been determined eligible for the National Register of Historic Places. Section 106 of the National Historic Preservation Act considers neglect an adverse effect. If the No Action alternative leads a steady decline in maintenance at each site, this could constitute an adverse effect. The Corps will need to address this matter in its evaluation. As the Upper St. Anthony Falls Lock lies in the center of the St. Anthony Falls National Register Historic District, adverse effects at the lock could also impact the historic district.

F. Recreation. The closure of the Upper St. Anthony Falls Lock has segmented the river for recreational craft and tour boats. The users of recreational craft can only use the river above or below the lock and dam or deal with complicated and more time-consuming effort of portaging or trailering their boats around the lock. Tour boats are now limited to the pools below the falls. If by a change in the Level of Service, the Lower St. Anthony Falls Lock and Lock No. 1 close to recreational craft and/or tour boats, this would further segment the river, compounding the issues just mentioned.

Visitor access to Lock and Dam No. 1. In addition to the recreation impacts mentioned above, how will visitor access change under No Action? If the Corps decides to prioritize its funding

elsewhere, or if they go to a lesser Level of Service, will the visitor facilities be open fewer hours or not at all?

G. Scenic Quality. All three lock and dam sites lie within the heart of the Twin Cities metropolitan area and will be highly visible to many people. The St. Anthony Falls area has received well over two billion dollars of investment over the past several decades, and the pace of investment is accelerating. Lock and Dam No. 1 lies within the highly scenic Gorge, directly below the Minnesota Veterans Home and next to the Ford site that will soon see a major new redevelopment. Consequently, the scenic quality of all three lock and dam sites is paramount, and if the No Action alternative could lead to visual impacts, the public will need to know.

H. Project Costs. Long-Term Costs. While the three sites require \$1.5 million in annual maintenance, what is the annual cost when major maintenance is factored in? We assume the economic analysis will address this, but to have the information now would help shape and focus our comments.

#### **IV. Deauthorization and Disposal**

##### The Meaning of Deauthorization and Disposal

Deauthorization and disposition would have significant consequences for the Mississippi NRRA. For any site or part of a site that leaves federal ownership, the NRRA will lose the special provisions and oversight granted in its authorizing legislation, including Sec. 704. As stated above, this section provides that:

Before any department, agency, or instrumentality of the United States issues or approves any license or permit for any facility or undertaking within the Area and before any such department, agency, or instrumentality commences any undertaking or provides any Federal assistance to the State or any local governmental jurisdiction for any undertaking within the Area, the department, agency, or instrumentality shall notify the Secretary.

This section then mandates timelines and recourse with Congress, if necessary, for the NRRA that non-federal entities would not have to honor, if there was no federal tie to their action. So, deauthorization and disposal could diminish and discontinue key protections for the seven resource types defined above. The NPS needs assurance that its ability to protect preserve and enhance the seven resource types Congress identified will not be lost or weakened by deauthorization and disposal. Consequently, the NRRA could need language in a deauthorization bill that would continue what its authorizing language provides.

B. Navigation. If the Corps deauthorizes and/or disposes of its locks and dams, it is unlikely that a new entity would continue to operate them for navigation. If the Lower St. Anthony Falls Lock and Lock No. 1 close, this would further segment the Mississippi River in the heart of the Twin Cities. The Lower St. Anthony Falls Pool and Pool 1 would become isolated from the rest of the river. Consequently, boaters would have to portage or trailer their boats around the locks and

dams. Upstream fish migration would end and with it the migration of mussels that use specific fish as hosts. Each pool could become a unique ecosystem, especially without dredging.

If Congress deauthorizes the locks and dams, but the Corps cannot find an entity that will take Lock and Dam No. 1 or Lower St. Anthony Falls Lock and Dam, what Level of Service would the Corps implement, and how would this impact recreation and other resources?

C. Dredging and Other Channel Maintenance. We are already seeing the impacts of the Corps no longer maintaining the 9-foot navigation channel. It is unlikely that another entity will take on the Corps' navigation mission of operating the locks, maintaining the channel and keeping up all the related infrastructure. The issues raised under the No Action alternative with regard to no dredging and channel maintenance also apply to deauthorization and disposal scenarios, unless a new entity agreed to resume dredging and lock use. Tour boats, recreational boats and marinas would likely be affected by the ending of navigation under a new owner.

D. Cultural and Historical Resources. If the sites are removed from federal ownership, we expect that the Section 106 review process would lead to a Programmatic Memorandum of Agreement that would provide for an equivalent level of review and protection to that had the sites remained under federal ownership. See also our comments on No Action.

#### E. Recreation

- Visitor Experience and Access
  - Upper St. Anthony Falls Lock. If the Corps disposes of the Upper St. Anthony Falls Lock to an entity that ended visitor access at the Upper Lock, this would adversely affect the visitor experience. Over the past three years of our partnership at the Upper Lock, the NPS and Corps have learned the public has a tremendous interest in visiting the lock. The National Parks Conservation Association and Friends of the Lock and Dam are advocating the lock become a world-class visitor center with the NPS leading the interpretive experience. The Minneapolis Park and Recreation Board's Water Works park development will transform the river's west bank, greatly increasing visitation to this area. A new owner could also preclude or greatly diminish the scope of all these plans.
  - Lock and Dam No. 1. Again, a new owner may not want to continue providing visitor access to this lock, which was designed to let visitors freely cross over the locks and access the outer lock wall.
- As discussed above, deauthorization and/or disposal would most likely end lock use at Lower St. Anthony Falls and Lock and Dam No. 1. This would end tour boat and recreational craft use of the locks and needs to be addressed.
- See comments under No Action and segmenting the river.

F. Scenic Quality. By discontinuing how the Corps has used and managed the three sites and the navigation channel, new uses could adversely affect the scenic qualities of each site and of the river. See also our comments on No Action.



G. Hydroelectric Power. What will happen to hydroelectric power production at Lock and Dam No. 1 and Lower St. Anthony Falls Lock and Dam if Brookfield decides not to take all or part of either site? If Congress deauthorizes the three sites and no other entity comes forward to take over the hydroelectric power generation, would Brookfield continue operating until the Corps finds a solution?

#### H. Direct, Indirect and Foreseeable Impacts

National Park Service guidance on NEPA states that “Courts have applied what is known as the “hard look” standard in deciding whether or not an agency has fully complied with the environmental analysis requirements of NEPA. This means that there must be evidence that the agency considered all foreseeable direct, indirect, and cumulative impacts; used sound science and best available information; and made a logical, rational connection between the facts presented and the conclusions drawn.” (NPS NEPA Handbook Supplemental Guidance)

**Foreseeable Impacts.** If the Corps can reasonably foresee the potential result of disposal or knows who one or more of the sites or portions of one of those sites will go to, then the Corps should have to evaluate these potential impacts of disposition. For example, if the Corps recommends to Congress or GSA that Brookfield get Lock and Dam No. 1, because Brookfield has made it known they want to take over that site, then the Corps should examine the effects of that transfer. Brookfield would have to clearly define what its intentions are with regard to the whole site or the portion or portions it agrees to take so that the Corps can provide a knowledgeable assessment of the known and potential direct, indirect and cumulative impacts.

If the Corps recommends deauthorization but has no likely taker for one or more of the sites, the Corps will need to address how it would manage the sites once deauthorized. If deauthorized, will the Corps have funding to maintain the sites? While there may be interest in acquiring some of the lands and structures associated with each site, it is likely no one will be interested in some elements. If one entity can take the more desirable elements, the possibility that another would take the less desirable ones decreases. This suggests that the Corps could get stuck with some elements indefinitely. If the Corps decides to dispose of one or more of the sites piecemeal, it should evaluate the direct, indirect and cumulative impacts of doing so.



*Working to protect the Mississippi River  
and its watershed in the Twin Cities area*

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October 18, 2019

US Army Corps of Engineers  
Attn: N. Bischoff (PM-B)  
180 5th Street East, Suite 700  
St. Paul, MN 55101

Re: Comments on the Scope of the Environmental Assessment for the Disposition Study for the Upper St. Anthony Falls Lock and Dam

Dear Ms. Bischoff:

Thank you for the opportunity to comment on the scope of the Environmental Assessment (EA) for the Disposition Study for the Upper St. Anthony Falls (USAF) Lock and Dam located in the Twin Cities.

Friends of the Mississippi River (FMR) is a non-profit organization with a mission to engage community members and other stakeholders to protect, restore and enhance the Mississippi River and its watershed in the Twin Cities Region. We represent thousands of people in the metropolitan area who care deeply about the river, including a growing membership of over 2,700 people and more than 3,200 volunteers and 2,000 advocates engaged each year.

FMR was founded in 1993 to provide a voice for the river and newly formed National Park – The Mississippi National River and Recreation Area (MNRRA). In 2014, we helped to organize and lead the Stop Carp Coalition's advocacy campaign to close the Upper St. Anthony Falls Lock. Today we work closely with MNRRA and a myriad of other agency and organizational stakeholders to help care for and celebrate the Mississippi River's amazing natural and cultural resources.

The significance of the Mississippi River throughout the study area cannot be overstated. St. Anthony Falls is the centerpiece of the Minneapolis riverfront and the reason for the city's founding. It is also the only natural waterfall on the entire length of the Mississippi River, the sounds and sights of which have attracted visitors for generations. Because these unique resources are so naturally and culturally significant, they played an important role in establishing the National Park designation for the river corridor.

During the past 25 years, the Minneapolis downtown riverfront has undergone an enormous transformation. Decades of neglect and environmental damage inspired the community to convert a blighted area to a National Historic District, a National Park and a vibrant downtown neighborhood, with well over two billion dollars invested to date. The Central Riverfront parks and trails draw millions of hikers, bikers and festivalgoers each year, as well.

We urge the Corps to conduct a thorough investigation of all the potential impacts to these important natural, cultural and recreational resources. Any recommendation to dispose of lock and dam infrastructure must be done in a manner that protects the environment, ensures public safety and provides public benefits to the community.

We also encourage the Corps to **conduct the disposition study as expeditiously as possible.**

***Generally speaking, FMR strongly supports the vision for a new visitor center at the Upper St. Anthony Falls Lock, put forth by the Friends of the Lock Dam with support from the City of Minneapolis and the National Park Service.***

Consistent with the plain language of the WRDA Act of 2018 and the Congressional Intent Letter signed by Senators Klobuchar and Smith, **the study should focus on a partial disposition**, and the partial disposition should reflect coordination (“a joint plan”) with the City to further local adopted plans for the central riverfront. In order fulfill the partial disposition option, the Corps would need to continue to own and operate those portions of the USAF lock necessary to maintain flood control.

**FMR does not support the “no action” alternative or the full disposal of the USAF lock** because these alternatives could prevent MNRRA from continuing to engage the public at the site.

The “no action” alternative does not ensure adequate ongoing maintenance of the lock structure. Since the Corps has a recreation mission at the USAF Lock, the Corps should continue maintenance as needed to facilitate visitor use and enjoyment.

We do not support the “disposal” alternative for the following reasons:

- If the USAF was no longer tied to the federal government, MNRRA could lose a critical review authority, and its ability to protect and enhance the site and area’s significant qualities will be diminished.
- Full disposal could lead to complete privatization of the site with no public access, which would be contrary to the aforementioned Congressional Intent Letter.
- Full disposal would prevent the continued flood control activities that the Corps is still responsible for under existing authorities.

To reiterate, we request that the Corps reject the “no action” and full disposition options, and focus the study on “partial disposition” alternatives that will best serve the public

interest. Approaching the study in this way will ensure that the Corps can expedite the process as directed to by Congress.

We support a robust evaluation of the environmental, social and economic impacts all the alternatives and proposals that are investigated through the study. In conducting the disposition study and EA, Friends of the Mississippi River requests that the Army Corps of Engineers evaluate and report on the following issues.

**The Study should give high priority to alternatives that will continue to serve the public interest.**

As described in our introductory comments, the location of this study is at the center of some of Minneapolis' most treasured public spaces. Located within a national park, a national historic district, a state critical area and a regional park, this place has a history of public investment and serving the public good.

The downtown riverfront, surrounded by historic treasures and other civic uses, is bursting at the seams with people who are filling up new parks and trails faster than they can be built. The Army Corps of Engineers is part of the community that has and will continue to expand opportunities for the public to enjoy this special place on the iconic Mississippi River.

In addition to the inherent value these places provide, everything that surrounds the USAF lock and dam represents many billions of dollars in public investment. We strongly urge the Corps to carefully examine how each alternative will continue to serve the public interest and give the highest consideration to those alternatives that prioritize public use and enjoyment of the river, the parks and other public amenities.

**Special consideration should be given to evaluate potential impacts to the National Park and its resources and programs**

The Mississippi National River and Recreation Area (MNRRA) was established by Congress as a National Park in 1988. The 72-mile corridor that runs from Dayton to Hastings represents the only unit of the National Park Service dedicated to celebrating and interpreting the Mississippi River. The Twin Cities metropolitan river corridor was given national park status because of its historical significance and outstanding natural resource value—and because this is where the Mississippi River changes the most, transitioning from a low-banked prairie river to a broad floodplain river lined with tall bluffs. A significant transition for those changes occurs right at St. Anthony Falls.

The Corps should evaluate the potential impacts each alternative will have on the seven resource types identified in the MNRRA enabling legislation: historical, recreational, scenic, cultural, natural, economic, and scientific. Although not specifically called out in the legislation, water resources play an extremely important role in the health of the river and park, and impacts to water resources should also be evaluated.



In 2016, the State of Minnesota adopted rules for the Mississippi River Corridor Critical Area, a state designated corridor that shares a boundary with MNRRA. Since MNRRA does not have regulatory authority for development in the corridor, the MRCCA rules provide standards to protect key resources in the park. The Corps should evaluate all options/alternatives to ensure they are consistent with the state MRCCA rules (chapter 6106).

In addition to ensuring that National Park resources are protected, the Study should consider potential impacts to park users. According to the Metropolitan Council, the Central Riverfront Regional Park is among the top five most visited parks in the region, with close to five million park users annually. These numbers are likely to grow as Waterworks is built as a public gathering place and housing development continues to add residents, and park users, to the area.

Currently, National Park Service staff provides visitor services and tours at the USAF Lock observation deck. Their involvement has dramatically increased the number of people that visit, experience and enjoy the lock. This arrangement provides great visibility for both the NPS and the Corps, and it should continue.

NPS staff and their partners also conduct paddling activities in Minneapolis with youth and adults, and they host paddle share stations along the river. The Corps should consider potential impacts to these NPS programs and the growing interest in paddle sports on the Mississippi River.

The geographic area of this study is entirely within the MNRRA, and ideally, the Corps would engage MNRRA as a close federal partner in conducting this study. At a minimum, National Park Service staff should play the role of a consulting agency of special significance.

The possibility of disposal of any of the Corps' infrastructure could have enormous impacts on the National Park, and we would like to see MNRRA staff be closely consulted in the Corps' decision-making process.

### **The Corps should make recommendations that improve the human and natural environment and create or enhance recreational opportunities**

Human Environment: The Corps should make recommendations that enable future uses at the USAF Lock to improve the human environment by transforming underutilized property into additional economic and cultural assets and creating a world-class destination to activate the community's relationship with the river.

Natural Environment: The Corps should make recommendations that will protect the natural and water resources around the USAF Lock, including ensuring that the aesthetic flow over the USAF dam spillway is consistent with the public interest and benefit. Furthermore, the Corps should make recommendations that consider the opportunity to enhance the natural environment through environmental restoration and stewardship.

**Recreational Opportunities:** The Corps should work with City and its partners, and consult with the National Park Service and the Minneapolis Park Board, to ensure the proposed alternatives would support and enhance anticipated riverfront improvements, including access to trails, fishing opportunities and other waterfront activation, water access and docking opportunities, and planned park development. In particular, the regional park plan to establish a portage route around the lock and dam should remain feasible even if ownership and/or use of the lock change.

**Historic Resources:** The Corps should consider the historical significance of the Upper Lock on the cultural, historic, archeological, socio-economic, recreational and other resources of the St. Anthony Falls Historic District. The Stone Arch Bridge is a highly significant historic resource that intersects with the USAF Lock. Any potential negative impacts should be avoided.

### **The Corps should not recommend the Crown Hydro Proposal as a feasible alternative**

In consideration of ways to improve the human, natural, recreational and cultural/historical resources surrounding the USAF lock and dam, it is clear that the Crown Hydro proposal is incompatible with these goals. Numerous questions about the Crown Hydro proposal have gone unanswered for years, including questions about possible damage to the Stone Arch Bridge. Another persistent conflict is near the water intake tunnel at the upstream end of the lock. The currents and suction created by this water intake would render paddling and portaging near the lock impossible and extremely dangerous.

The Corps should make recommendations that are in the public interest, and should give significant weight to the statements of numerous stakeholders and the City resolution that development of a hydroelectric power plant on the USAF Lock would be counter to the public interest. Furthermore, the Corps should conclude that a hydroelectric power facility cannot coexist with the envisioned public use of the land because it would be incompatible with providing access to hazard-free water for boats and people on both the upriver and downriver sides of the property.

### **The Corps should make recommendations consistent with, the relevant guidance and public interest as defined in all adopted plans and resolutions that will be impacted by the Corps' recommendation and actions**

There are numerous local, regional and national adopted plans, resolutions, initiatives and projects underway for this stretch of the river, and it is essential that the Corps review these documents, identify possible conflicts and/or inconsistencies with the disposition study alternatives and report on potential impacts to current and future river corridor plans and projects, including cumulative effects.

#### *Documents to review include the following:*


- Mississippi National River and Recreational Area - Comprehensive Management Plan;

- State of Minnesota - Mississippi River Corridor Critical Area, Minn. Rules Ch. 6106;
- City of Minneapolis - Downtown Public Realm Framework Plan; City Resolution 2018R;
- Minneapolis Park & Recreation Board - Central Mississippi Riverfront Regional Park Master Plan; Water Works/Mill Ruins Park;
- Minneapolis Downtown Council – Intersections: Downtown 2025 Plan;
- Meet Minneapolis Convention and Visitor Association - Destination Transformation 2030;
- National Parks Conservation Association - Transforming the Lock;
- St. Anthony Falls Heritage Board - Changing Relationships to the Power of the Falls

The study should also include a review of public safety matters through consultation with the Hennepin County Water Patrol, Minnesota Department of Public Safety, Minneapolis and St. Paul Fire and Police Departments, and other relevant public safety agencies.

Thank you for your consideration of our comments. Please contact me ([wclark@fmr.org](mailto:wclark@fmr.org)) or Irene Jones ([ijones@fmr.org](mailto:ijones@fmr.org)) if you have any questions.

Sincerely,

A handwritten signature in black ink, reading "Whitney L. Clark". The signature is fluid and cursive, with the first name "Whitney" being the most prominent part.

Whitney L. Clark  
Executive Director



1414 West Hamilton Avenue  
P.O. Box 8  
Eau Claire, WI 54702-0008

October 14, 2019

U.S. Army Corps of Engineers  
Project Management  
Minneapolis, Locks Disposition  
180 5<sup>th</sup> St. E, Suite 700  
St. Paul, MN 55101

Subject: **Xcel Energy Comments on USACOE Disposition Study**  
St. Anthony Falls Hydroelectric Project (FERC Project No. 2056)

To Whom it May Concern:

Xcel Energy was recently invited to a public meeting that the U.S. Army Corps of Engineers (USACOE) held to begin their disposition study at the upper St. Anthony Falls lock and dam. As a result of the closure of the lock in 2015 by 2014 Congressional order, the USACOE is performing a disposition study to evaluate options for the future of the upper lock.

Xcel Energy has been a neighbor to the USACOE since the early-1960's at the upper dam. The upper St. Anthony Falls hydro project (the project) has continued to operate to the present day for its original use of serving the public. Both entities have shared responsibilities for maintaining the dam structures, which maintains the pool at the required levels, as well as passing flood flows when the Mississippi River is flowing around 50,000 cfs or higher. The upper lock and dam structures are not only essential for maintaining the proper elevations for hydro generation, but it also serves upstream customers like the City of Minneapolis Water and Xcel Energy's Riverside generating plant.



Xcel Energy has serious concerns regarding the disposition study and the potential outcomes and the impacts it may have upon the future operation and presence of the project. The project depends on the COE's dam structure to maintain pool level as well as to pass flood flows when necessary. Xcel Energy has determined that the current discharge capacity of the dam is dependent on the flood control tainter gate in the lock. Without it, the project does not meet federal dam safety requirements.

The USACOE has historically assisted Xcel Energy in replacing damaged flashboards by passing water through the two lock valves as we do not have enough hydraulic capacity in the powerhouse or from spillway gates that were originally present but replaced with the lock and dam structure. The flashboards help maintain the reservoir elevation while providing discharge capacity to pass flood flows. It is unclear if these two lock valves would be operable and available in the future. Xcel Energy has been assured that the flood control gate that is being refurbished now can be used to serve that function in the future. This opportunity would no longer be available to Xcel Energy if the lock gate was removed from service or another entity ended up owning the lock and dam structure and were not willing to operate the gate.

Access to Xcel Energy structures from the USACOE side (west side) is also essential to maintain and operate the project. Xcel Energy maintains a blower building and system on the limestone wall which requires operations during the winter months and maintenance throughout the year. We also access the main spillway structure and the limestone wall regularly for inspections and maintenance activities.

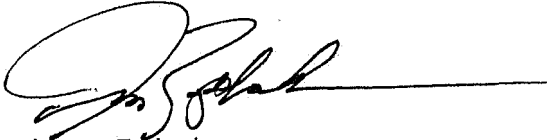
The property that the USACOE currently utilizes for the lock and dam structure was formerly owned by a predecessor company and then transferred to Xcel Energy as part of a merger. Prior to the lock and dam construction, another section of a dam existed at this location, which included spillway gates used for passing flood flows. This portion was eliminated with the construction of the lock and dam. If the USACOE lock and dam structure or the flood control gate is removed from service, it would have to be replaced with spillway gate(s) to pass a comparable amount of flow. Xcel Energy feels the disposition study should address the USACOE's responsibility to maintain the flood control gate for mitigation for flooding on the Mississippi River in the City of Minneapolis.

Xcel Energy is actively researching its records for any type of documentation that transferred ownership of our property to the USACOE and what, if any, agreements went with this. Xcel Energy would greatly appreciate any assistance the USACOE could provide for finding any records that might be available regarding this transaction to determine if there are any

requirements or stipulations in the event that the USACOE no longer was to own and operate the upper lock and dam.

Should you have any questions or concerns regarding this information, please feel free to contact Mr. Robert Olson of my staff at (715) 737-2692.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. Zyduck', followed by a long horizontal line.

James Zyduck

Director, Hydro Plants

c: Col. Sam Calkins (USACOE)  
Ms. Nan Bischoff (USACOE)  
Project Files

H:\references\St.AnthonyFalls\October 11, 2019 Letter to COE on Disposition.docx



October 18, 2019

US Army Corps of Engineers  
Attn: N. Bischoff (PM-B)  
180 5<sup>th</sup> Street East, Suite 700  
St. Paul, MN 55101

Re: Comments on the Scope of the Environmental Assessment for the Disposition Study for the Upper St. Anthony Falls Lock & Dam

Dear Ms. Bischoff:

On behalf of the National Parks Conservation Association (NPCA), we thank you for the opportunity to comment on the scope of the Environmental Assessment (EA) for the Disposition Study for the Upper St. Anthony Falls Lock and Dam.

On August 20, 2018, NPCA submitted comments on the Scope of the Environmental Assessment for the Disposition Study for the Upper St. Anthony Falls Lock, the Lower St. Anthony Falls Lock and Dam and Lock and Dam #1. Following the close of that comment period, NPCA worked with members of the Minnesota congressional delegation and other partners to successfully pass language in the Water Resources Development Act of 2018 (WRDA 2018) directing the Corps to produce a study for the Upper Lock separate from Lower and Lock #1. The language also requested that the Corps consider partial disposition and other measures for the Upper Lock (Section 1225 of WRDA 2018). The Corps subsequently re-opened comment on the Upper Lock and expanded considerations for public input. We attach hereto for the record a copy of our previous comments as they include information relevant to those expanded considerations and we provide additional comment below.

**Minnesota Field Office**

546 Rice Street, Suite 100 | St. Paul, MN 55103 | P 612-270-8564 | [npca.org](http://npca.org)

## Expanded Considerations for Public Input

The Corps released “Revised Implementation Guidance for Section 1225 of the Water Resources Development Act (WRDA) of 2018, Upper Mississippi River Protection” and subsequently held public meetings in which it asked for comment on the following measures found in Section 1225:

### *(1) Measures which preserve and enhance recreational opportunities and health of the ecosystem*

The Upper St. Anthony Falls Lock sits next to the only major waterfall on the entire Mississippi River and within the boundary of a national park, the Mississippi National River and Recreation Area (MNRRA). In establishing MNRRA, Congress found that the special resources of the park should be preserved and protected for the benefit of the people.<sup>1</sup>

The National Park Service (NPS) is managing the visitor center at the Upper Lock pursuant to a use agreement with the Corps through part of 2021. This last summer in 2019, more than 25,000 people visited the lock, which represents a 40 percent increase from the previous year.<sup>2</sup> Visitation has steadily increased since NPS first started managing the lock tours in 2016 and is ten times higher than when the Corps managed tours at the site. The public clearly has enjoyed visiting the Upper Lock under the guidance of the NPS. The Corps should make recommendations that allow NPS to continue its interpretive role at the Upper Lock, and visitors can engage with their national park and feel connected to the river.

After NPS entered into a use agreement with the Corps, the National Parks Conservation Association and MSR Design worked with 10 Thousand Design, Exponent PR, and more than 150 community members to develop a vision for the future of the Upper St. Anthony Falls Lock. That vision entitled *Transforming the Lock* (attached hereto) recognizes the community’s desire for continued recreational access and the interpretative opportunity with a National Park Service presence at the site. Prior and subsequent to this visioning process, several other adopted plans, resolutions, initiatives and projects, including the Friends of the Lock and Dam’s *The Falls* proposal, have been released that detail a desire for riverfront improvements that benefit recreation and ecosystem health (see August 20, 2018 comments for full list).

The Corps should only consider measures that ensure continued public use and enjoyment of the site given the clear intent of the community to be connected to the river and the national park and to redevelop this site into a world class cultural and recreational destination.

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<sup>1</sup> Public Law 100-696, Section 701(a), 102 Stat. 4599, Nov. 18, 1988.

<sup>2</sup> Upper St. Anthony Falls Lock and Dam, 2019 Visitor Engagement Report, Mississippi River Fund (October 2019). In 2018, there were 417,021 visitors to MNRRA that spent more than \$18.5 million in the local communities and generated an additional \$25.6 million in economic activity. Source: 2018 National Park Visitor Spending Effects, Economic Contributions to Local Communities, States, and the Nation, Natural Resource Report NPS/NRSS/EQD/NRR—2019/1922, Appendix A, Table A-1, p. 30.



*(2) Measures which maintain the benefits to the natural ecosystem and the human environment*

The Upper lock is currently serving national park visitors as well as flood mitigation and water supply functions. In order to maintain these benefits, the Corps should make recommendations that ensure continued public ownership and access to the site and a continuation of the National Park Service's interpretive role. Public ownership will also enable the community's plans to transform the underutilized property at the lock into additional economic and cultural assets as detailed in the aforementioned vision documents.

The Corps should also make recommendations that will protect the natural beauty of the Upper falls, including ensuring that the aesthetic flow over the dam is consistent with the public interest. For generations, millions of people have appreciated the view of the only major waterfall on the entire Mississippi River from the Stone Arch Bridge and other points of interest in the Central Riverfront. Any activities that will diminish the flow will harm the natural environment as well as the use and enjoyment of park visitors. For example, the construction of a hydroelectric power plant at the lock has the potential to further draw down water from the St. Anthony Falls. This would undermine the natural beauty and ecosystem of the falls. The Corps should make recommendations that benefit the natural environment at the Upper falls for future generations.

*(3) Measures which include removal or partial removal of the project*

The study should select partial disposition as the preferred alternative, which would allow the Corps to retain the lands and project features necessary for flood mitigation and water supply and dispose of features not needed for those purposes.

Partial disposition is consistent with the plain language of WRDA 2018, which requires that the study include a plan for "a partial disposition of the Upper St. Anthony Falls Lock and Dam facility and surrounding real property that preserves any portion of the Upper St. Anthony Falls Lock and Dam necessary to maintain flood control..."<sup>3</sup>

This alternative is also consistent with the Congressional Intent Letter sent by Senators Klobuchar and Smith to the Corps that states "it is our intent that...the Corps would continue to own, operate and maintain the Upper Lock facility for flood control and water supply management..." (January 8, 2019).

The remaining elements not needed for flood mitigation could be then transferred to the City of Minneapolis, which passed Resolution 2018R-098 in support of the site's redevelopment in partnership with Friends of the Lock and Dam. The City is the public entity best positioned to further the redevelopment initiatives desired by the community.

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<sup>3</sup> WRDA 2018, Section 1225 (d)(2).

*(4) Measures which maintain flood damage mitigation capability*

The Corps should continue to own and operate those portions of the Upper Lock necessary to maintain flood control as directed in Section 1225 of WRDA 2018. The Upper Lock continues to serve critical purposes in the community, including flood mitigation and water supply, and the Corps is uniquely qualified to operate and manage the site for those purposes.

Comment on No Action and Full Disposal Alternatives

Under the No Action Alternative, the Corps would continue to operate the flood gate as needed and allow agreements with the National Park Service to conduct tours at the site. The Corps noted in its public presentation that it would also “continue maintenance as needed to preserve the flood gate operation.” However, it’s not clear if maintenance for the rest of the Upper Lock infrastructure would continue.

As noted, NPS conducts tours at the site. And the Corps acknowledged in its public presentation that recreation is a secondary purpose of the Upper lock. If the Corps chooses the No Action alternative, it should also state that it will continue maintenance as needed to fully facilitate visitor use and enjoyment. There are already maintenance issues at the Upper Lock, and without continued maintenance at the site, there will be a gradual and steady deterioration of the site. Visitors to Corps and National Park Service sites expect professionally maintained facilities, and it would reflect poorly on both agencies if the facilities did not meet those expectations.

Under the Disposal Alternative, the Corps would deauthorize the navigation, recreation and flood mitigation missions and dispose of the federal project, including all lands, buildings, and property. If the Corps disposed of the Upper Lock to an entity that ended or greatly reduced public use and access, this would adversely impact the larger community vision for the site and visitors to the national park, contrary to the purposes for which MNRRA was established. A new owner could also preclude the Minneapolis Park and Recreation Board from fully implementing plans for its Water Works park development adjacent to the Upper lock, which envisions expanded access to the river. The Corps should reject this alternative as it is contrary to congressional intent, MNRRA’s purpose and the community’s vision for continued and expanded access to the river.

Timing of Disposition Study

Section 1225 also included a provision calling for the disposition study to be expedited.<sup>4</sup> We encourage the Corps to conduct the disposition study as expeditiously as possible given there will likely need to be congressional action to advance the Corps’ recommendation.

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<sup>4</sup> WRDA 2018, Section 1225 (d)(3).

Congressional action will depend on the timing of the next WRDA bill, and further delays could jeopardize the ability to advance redevelopment at the site given the various funding cycles and other decisions that will come into play.

### Conclusion

We have a one-in-a-lifetime opportunity to shape the future of the riverfront and our national park in Minneapolis through redevelopment of the Upper St. Anthony Falls Lock with the National Park Service at its center. The best outcome for that future is through partial disposition wherein the Corps continues ownership of parts of the lock needed for flood mitigation purposes and divests the rest to the City of Minneapolis, which has expressed a commitment to further the community's vision for continued use and enjoyment of the site.

We thank you for the opportunity to submit comments.

Sincerely,



Christine Goepfert  
Associate Director, Midwest Region

Attachments:

NPCA Comments submitted 8/20/18  
"Transforming the Lock"



August 20, 2018

US Army Corps of Engineers  
Attn: N. Bischoff (PM-B)  
180 5<sup>th</sup> Street East, Suite 700  
St. Paul, MN 55101

Re: Comments on the Scope of the Environmental Assessment for the Disposition Study for the Upper St. Anthony Falls Lock, the Lower St. Anthony Falls Lock and Dam and Lock and Dam #1

Dear Ms. Bischoff:

On behalf of the National Parks Conservation Association (NPCA), we thank you for the opportunity to comment on the scope of the Environmental Assessment (EA) for the Disposition Study for the above-referenced locks located in the Twin Cities.

Since 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System, working together with our more than one million members and supporters nationwide to preserve our nation's natural, cultural and historic heritage for future generations.

NPCA has a longstanding interest in protecting our national parks and their resources, and we are particularly interested in the outcome of the Disposition Study because it will impact the future of three sites within the boundary of the Mississippi National River and Recreation Area (MNRRA). However, the focus of our comments will be on the Upper St. Anthony Falls (USAF) Lock because the National Park Service (NPS) currently undertakes tours of that site pursuant to a use agreement with the U.S. Army Corps of Engineers (Corps). The outcome of the study will have direct impacts on NPS' role at the lock going forward as well as on national park visitors' use and enjoyment of the site.

The Study should consider impacts to the the national park and its resources

In establishing the Mississippi National River and Recreation Area on November 18, 1988, Congress found that "[t]he Mississippi River Corridor within the Saint Paul-Minneapolis Metropolitan Area represents a nationally significant historical, recreational, scenic, cultural, natural, economic, and scientific resource," and that "[t]here is a national interest in the



preservation, protection and enhancement of these resources *for the benefit of the people of the United States.*<sup>1</sup>

As more fully laid out in the comments submitted by NPS, the Corps should evaluate the potential impacts the No Action and Deauthorization/Disposal alternatives will have on the seven resource types identified in the park's enabling legislation.

Furthermore, NPS should be considered a consulting agency with special significance throughout the development of the Disposition Study and be afforded additional time within which to provide comments. Pursuant to MNRRRA's enabling legislation, when other federal agencies undertake actions within the park's corridor, a notification and 60-day review should be granted to NPS (via the Secretary of Interior) regarding such actions.<sup>2</sup> In addition, NPS has a use permit with the Corps through May 19, 2021, that allows the park to operate the visitor center and provide tours at the lock. Given the legal mandate and partnership between the federal entities, NPS should be afforded a higher-level of consultation throughout the study process.

#### The Study should consider how the USAF will continue to serve the public interest

In establishing MNRRRA, Congress found that the special resources of the park should be preserved and protected for the benefit of the people. Currently, NPS is managing the visitor center at the USAF Lock pursuant to a use agreement that runs into 2021. In the three summers that NPS has managed the visitor center, the site has seen a substantial increase in visitation.

As of August 1, 2018, the total visitation for the Upper Lock since NPS started offering tours has been 47,352,<sup>3</sup> broken down as follows:

2018 – 10,757 (season still ongoing)

2017 – 21,154

2016 – 15,441

These numbers are in stark contrast to the visitation figures when the Corps was solely responsible for management of the visitor center at USAF, which as reported by Corps staff averaged 2,000 visitors each summer season. The public clearly has enjoyed visiting the USAF Lock under the guidance of the NPS. And the visitation numbers will only go up considering that Phase I of the nearby Water Works Park will be opening in 2019 and the area already sees over 2.5 million visitors annually. The Corps must consider the existing public use of the site in its analysis because any future use of the site that does not include public access and NPS presence does not “benefit the people” and runs contrary to the very purpose for which this

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<sup>1</sup> Public Law 100-696, Section 701(a), 102 Stat. 4599, Nov. 18, 1988 (Emphasis added).

<sup>2</sup> *Id.* at 704 (b), 102 Stat. 4604.

<sup>3</sup> The National Park Service tracks the number of daily visits to the site and provided these numbers.

national park was designated. The Study should consider the impact the No Action and Disposal alternatives will have on the existing and future public use of the site.

#### The Study should consider public input about the future use of the site

The closure of the Upper St. Anthony Falls Lock opened a unique opportunity to bring the power of the National Park Service arrowhead to the City of Minneapolis by keeping the Park Service central to the future of this site. After NPS entered into a use agreement with the Corps, the National Parks Conservation Association and MSR Design worked with 10 Thousand Design, Exponent PR, and more than 150 community members to develop a vision for the future of the Upper St. Anthony Falls Lock.

The community is especially invested in this site because it is central to the Central Riverfront in Minneapolis. The lock sits next to the only major falls on the entire Mississippi River and within the boundary of the national park. The site is closely linked to Mill Ruins Park, Mill City Museum and the James J. Hill's Stone Arch Bridge. The Minneapolis Park and Recreation Board and Minneapolis Parks Foundation are moving forward on the Water Works Park project, which will enhance the west side of the Mississippi River next to the lock.

After bringing the community together to consider the potential for this site as a world class visitor center with NPS at its center, NPCA released *Transforming the Lock* (attached hereto), which captures the community-driven ideas and concepts that will help lay a foundation for future planning and design. Since its release, we have been working closely with the Friends of the Lock and Dam and many others in the community to bring a shared vision forward. The Study should consider the impact the No Action and Disposal alternatives will have on the community's vision for the site.

#### The Study should consider the economic value of the national park

Not only are America's national parks some of the most awe-inspiring places in the world, they are also huge economic generators for the local communities that surround them.

According to the annual, peer-reviewed economics report, 2017 National Park Visitor Spending Effects, America's 417 National Park Service sites had 331 million visitors who contributed \$34.9 billion to the U.S. economy, including \$18.2 billion in local gateway regions (defined as communities within 60 miles of a park).<sup>4</sup> This visitor spending also supported 306,000 jobs, with the vast majority of them defined as local jobs, including those in the hospitality, retail, transportation, and recreation industries.

Locally, 439,735 visitors (up from 256,944 in 2016) to the Mississippi National River and Recreation Area spent more than \$18.6 million in the local communities, supporting 262 jobs

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<sup>4</sup> 2017 National Park Visitor Spending Effects, Economic Contributions to Local Communities, States, and the Nation, Natural Resource Report NPS/NRSS/EQD/NRR—2018/1616, Executive Summary at v.

and generating an additional \$25.6 million in economic activity.<sup>5</sup> All of these numbers represent substantial increases from the previous year. And these visitation numbers are likely lower than actual visitation because it is difficult to get an accurate visitor count at MNRRA given it cuts through 25 local communities along its 72-mile stretch.

Because MNRRA, like all our national parks, is an economic driver in the region, the Study should consider the impact the No Action and Disposal alternatives will have on the park and economy.

#### The Study should consider all plans and projects in the cumulative effects analysis

During the public and stakeholder meetings, the Corps indicated it would include in the EA an analysis of the economic, cultural, historic, and recreational significance of the USAF lock. These impacts should be studied and reported on in the *cumulative effects* section of the EA. This section should make note of all the adopted plans, resolutions, initiatives, and projects underway that would be impacted by the No Action and Disposal alternatives, including:

- City of Minneapolis Resolution 2018R-098 (approving the redevelopment plan known as “The Falls Initiative”);
- Friends of the Lock and Dam’s “The Falls Initiative”;
- National Parks Conservation Association’s “Transforming the Lock” ideas book;
- Water Works Park;
- Destination Transformation 2030 plan;
- Minneapolis Park and Recreation Board’s Central Mississippi Riverfront Regional Park Master Plan;
- Downtown Council’s Intersections: Downtown 2025 plan;
- St. Anthony Falls Heritage Board’s Changing Relationships to the Power of the Falls – West Bank plan;
- Mississippi National River and Recreational Area - Comprehensive Management Plan;
- State of Minnesota - Mississippi River Corridor Critical Area, Minn. Rules Ch. 6106;
- as well as numerous other long-range plans for the area.

The Study should consider the impact the No Action and Disposal alternatives will have on each of these studies as well as the larger vision for the area that is reflected in these studies.

#### The Study should consider impacts to the other essential functions of the Lock

The USAF Lock has other purposes beyond navigation, including recreation, flood mitigation and water supply, all of which the Corps is uniquely qualified to manage given its expertise. The Study should consider the impact Disposal will have on these purposes, regardless if they are considered secondary or integral, especially if another entity takes ownership. An analysis should be done to determine the ability of any potential owner to successfully maintain and

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<sup>5</sup> *Id.* at Appendix, Table 3, p. 25.

operate this critical infrastructure without jeopardizing the City's water supply, endangering people and places in the area during flooding and cutting off recreational use of the site.

The Study should consider partial disposition as an alternative

The Corps has stated that the Study will only consider two alternatives: No Action or Deauthorization/Disposal. However, during public and stakeholder meetings, Corps staff indicated that partial disposition could be considered. It is imperative that additional alternatives are considered that could benefit the public interest, and partial disposition is an option that would do so.

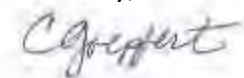
Partial disposition would make it easier for other entities with a public interest to consider partial ownership of the site. In fact, a representative with the City of Minneapolis made this point during the stakeholder meeting at the Corps office on July 18th. As noted above, the City passed a Resolution in support of the site's redevelopment and sought state bonds during the legislative session for pre-design of the site. Under a partial disposition alternative, the Corps could retain ownership of the USAF lock structure and continue to maintain and operate the structure for flood control and water supply, while another entity with a public purpose could acquire a portion of the real property in order to facilitate redevelopment of the site pursuant to the community's vision. The Corps should seek to identify paths toward a beneficial, public use of the site and partial disposition is such a path.

Conclusion

We have a one-in-a-lifetime opportunity to shape the future of the riverfront and our national park in Minneapolis. The community wants to see the Upper St. Anthony Falls Lock become a world class destination where national park visitors can experience the power of the falls, learn about the area's history from our nation's greatest storytellers and experience relevant programs that connect them to the river. The Corps is a valued partner in this endeavor, and we urge the Corps to carefully consider its conclusions and recommendations in the light of this shared vision.

We thank you for the opportunity to submit comments.

Sincerely,



Christine Goepfert

Associate Director, Midwest Region

Attachment: "Transforming the Lock"

**Minnesota Field Office**

546 Rice Street, Suite 100 | St. Paul, MN 55103 | P 612-270-8564 | npca.org



# TRANSFORMING THE LOCK

A Vision for a National Park Visitor Experience





## APPRECIATION

We are grateful for the ideas and energy of more than 150 people in creating this vision for the future of the Upper St. Anthony Falls Lock.

Our special thanks for the creativity and talent of:

MSR



*These community generated ideas were supported in part by The George Family Foundation and the National Parks Conservation Association Midwest Regional Council.*



## CONGRESS OF THE UNITED STATES HOUSE OF REPRESENTATIVES

Dear Friends,

As the representative for Minnesota's Fifth Congressional District, I am pleased to introduce "Transforming the Lock: A vision for a national park visitor experience at the St. Anthony Falls." Years ago, I led the effort to pass bipartisan legislation that closed the St. Anthony Falls Upper Lock to boat traffic in order to stop the spread of invasive carp into the Mississippi headwaters. This closure opened a unique opportunity for the people who visit, live and work near our riverfront — a chance to create a world-class visitor destination in the center of the Mississippi National River and Recreation Area.

The lock is located in the heart of downtown Minneapolis, an area that welcomes more than two million visitors every year. Since the lock's closure, the U.S. Army Corps of Engineers and the National Park Service have joined together to provide tours so that people can see the inner workings of the lock and learn about the history of the mighty Mississippi River.

Over the last two years, more than 150 people from the Twin Cities came together to develop ideas for the future of this historic building in the central riverfront. "Transforming the Lock" reflects input from community groups, planning professionals, educational and cultural institutions, business leaders and government agencies. These ideas would help make this part of our downtown more beautiful, more accessible, and more representative of the history and importance of the Mississippi River.

Not many cities have a National Park running right through their heart. Now is the time to transform the Lock into a destination that reflects our relationship with the Mississippi National River and Recreation Area. I look forward to working with fellow Minnesotans to make this vision a reality.

Sincerely,

KEITH ELLISON  
Member of Congress

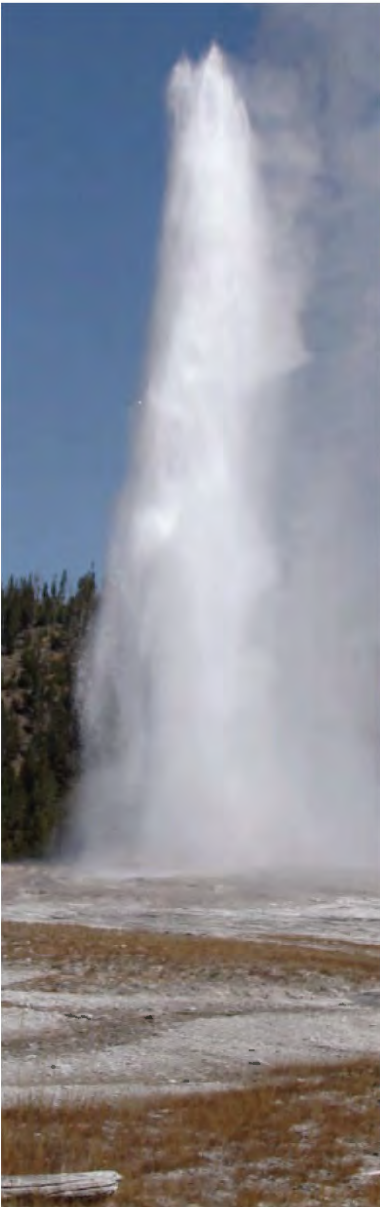
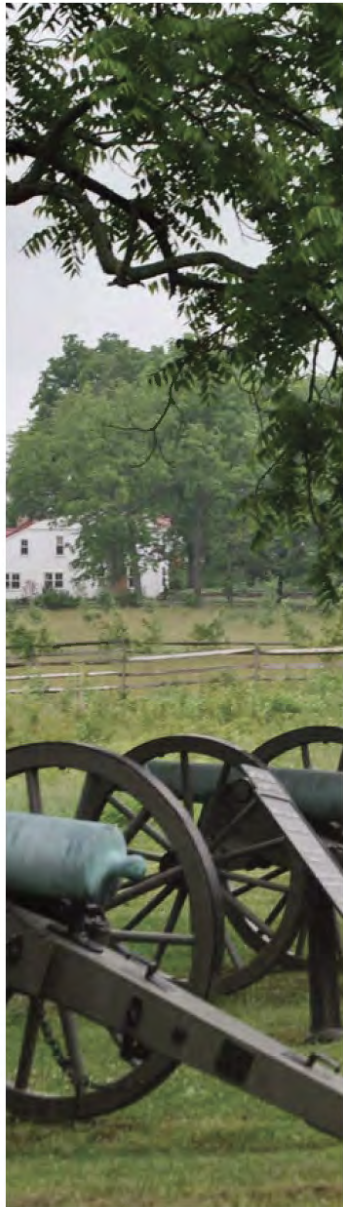
## ADVISORY TEAM

Amy Spong, *Minnesota Historical Society*  
Andrea Kajer, *Minnesota Historical Society*  
Anita Tabb, *Minneapolis Park and Recreation Board*  
Ben Shardlow, *Minneapolis Downtown Council*  
Brittany Voss, *Exponent*  
Bruce Chamberlain, *Minneapolis Parks Foundation*  
Cara Letofsky, *Metropolitan Council District 8*  
Carletta Sweet, *Downtown Minneapolis Neighborhood Association*  
Edna Brazaitis, *St. Anthony Falls Heritage Board*  
Elie Farhat, *Office of County Commissioner Marion Greene*  
Greg Swanholm, *Office of Senator Amy Klobuchar*  
Heidi Ritchie, *Office of Minneapolis Councilman Jacob Frey*  
Irene Jones, *Friends of the Mississippi River*  
Jack Byer, *City of Minneapolis*  
Jay Cowles, *Mississippi Park Connection*  
Jayne Miller, *Minneapolis Park and Recreation Board*  
Jeff Johnson, *Minneapolis Convention Center*  
Jennifer Yoos, *VJAA*  
John Anfinson, *National Park Service*  
Jonathan Moore, *National Park Service*  
Katherine Lamers, *Minneapolis Park and Recreation Board*

Kathleen Boe, *Minneapolis Riverfront Partnership*  
Katie Nyberg, *Mississippi Park Connection*  
Kjersti Monson, *Friends of the Lock and Dam*  
Laura Salveson, *Mill City Museum*  
Lisa Hondros, *St. Anthony Falls Alliance*  
Liz Wielinski, *Minneapolis Park and Recreation Board*  
Meg Forney, *Minneapolis Park and Recreation Board*  
Michael Rainville, *Meet Minneapolis*  
Michael Schroeder, *Minneapolis Park and Recreation Board*  
Nanette Bischoff, *U.S. Army Corps of Engineers, St. Paul District*  
Nicky Leingang, *Office of Congressman Keith Ellison*  
Pat Nunnally, *University of Minnesota*  
Paul Reyelts, *Friends of the Lock and Dam*  
Peter Gove, *National Parks Conservation Association Council*  
Peter Wagenius, *Office of Minneapolis Mayor Betsy Hodges*  
Sara Barrow, *Xcel Energy*  
Thomas Fisher, *University of Minnesota*  
Tom Evers, *Minneapolis Parks Foundation*  
Vincent James, *VJAA*  
Win Rockwell, *The Great Plains Institute*

*A special thanks to Michael DeRusha from the U.S. Army Corps of Engineers, Andrew Arlt and students from the River's Edge Academy, and Patrick Lynch and Eric Miller whose photography is featured throughout.*





# VISION

Visitors to our national park will experience the river's history, power and majesty at the Upper St. Anthony Falls Lock.

The lock becomes a world class destination with amenities and programs for residents and visitors; safe and accessible streets, trails and transit.





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## FROM ADVOCACY TO VISION

On June 10, 2015, the Upper St. Anthony Falls Lock in Minneapolis closed to boat traffic in order to stop invasive Asian carp from continuing their march up the Mississippi River; thereby protecting thousands of lakes and miles of rivers upstream. Closing the lock happened only because of the passion and advocacy by a community determined to protect its way of life and its precious water resources.

With the closure of the lock, located at the mid-point of the 72-mile Mississippi National River and Recreation Area, we have an opportunity to shine a spotlight on this national park and create a world class experience for city residents and visitors alike.

Much like Independence Hall in Philadelphia and the Gateway Arch in St. Louis, our own urban national park boasts significant stories and unique features near a thriving downtown area. This stretch of the river is home to the only major falls on the entire Mississippi. And while it's already a bustling riverfront, most are unaware that they are in a national park.

There is a lot of momentum in the city to develop a strong network of riverfront parks and attractions that will make Minneapolis a premier place to visit and experience the Mississippi River. "Transforming the Lock" is about capturing that momentum and bringing forward a shared vision for the future with one of our greatest assets at the center – the National Park Service.

Closing the lock took passion and dedication toward a shared goal, not to mention an Act of Congress! Working together, we can ensure the lock will become a welcoming place to celebrate our heritage within the national park.

Christine Goepfert  
National Parks Conservation Association



*With more than one million members and supporters, National Parks Conservation Association is America's voice for national parks. Founded in 1919, NPCA is an independent, nonpartisan voice working to strengthen and protect our nation's natural, historical, and cultural heritage.*





## ABOUT THE LOCK

“The Mississippi River is one of the world's most renowned rivers. Only one national park unit has a specific reach of the great river as its focus and mission, and that park is the Mississippi National River and Recreation Area.”

National Park Service



1933 ————— Mississippi River Nine Foot  
Channel Construction Begins  
1937 ————— Congressional Approval  
for Upper St. Anthony Lock

1959 ————— Lock Construction Begins

1963 ————— Lock Construction Ends

2015 ————— Lock Closes to Navigation

2016 ————— NPS Begins Lock Tours



Historic depictions of the river from 1786 to construction of the Upper St. Anthony Falls Lock in 1960. Courtesy of Minnesota Historical Society.

## HISTORY & SIGNIFICANCE

The City of Minneapolis owes its start to St. Anthony Falls, the only major falls on the entire Mississippi River. The power that the falls generated led to the city's early industrial development, first for sawmilling, then for flour milling.

By 1880, Minneapolis had become the nation's flour milling capital. Rail lines, including the Stone Arch Bridge, soon emerged to connect the wheat fields to the mills in order to feed the nation's demand for flour. The falls provided a critical source of power for industry and enabled drinking water to be pumped to residents across the city.

In the early 1900s, Minneapolis began to lose its dominant position in the flour milling industry. After 1930, the flour mills gradually began to shut down, and by the late-20th century, most of the milling operations ceased.

Despite the fall of the milling industry, city leaders knew the river had other economic uses and pushed for a series of locks and dams that would bring navigation above St. Anthony Falls where the city could build a shipping terminal. In 1963, the Upper St. Anthony Falls Lock and Dam was completed by the U.S. Army Corps of Engineers, allowing barges to move goods upstream above the falls and making Minneapolis the head of navigation on the river.

Long before the rise of the Twin Cities and the building of the lock, St. Anthony Falls was culturally and historically important to the Native American people who lived along the shores of the Mississippi River. The falls provided a place for ceremonies and

even served as a source of special clay for painting by the Dakota, who called the river Ha Ha Wakpa or "River of the Falls."

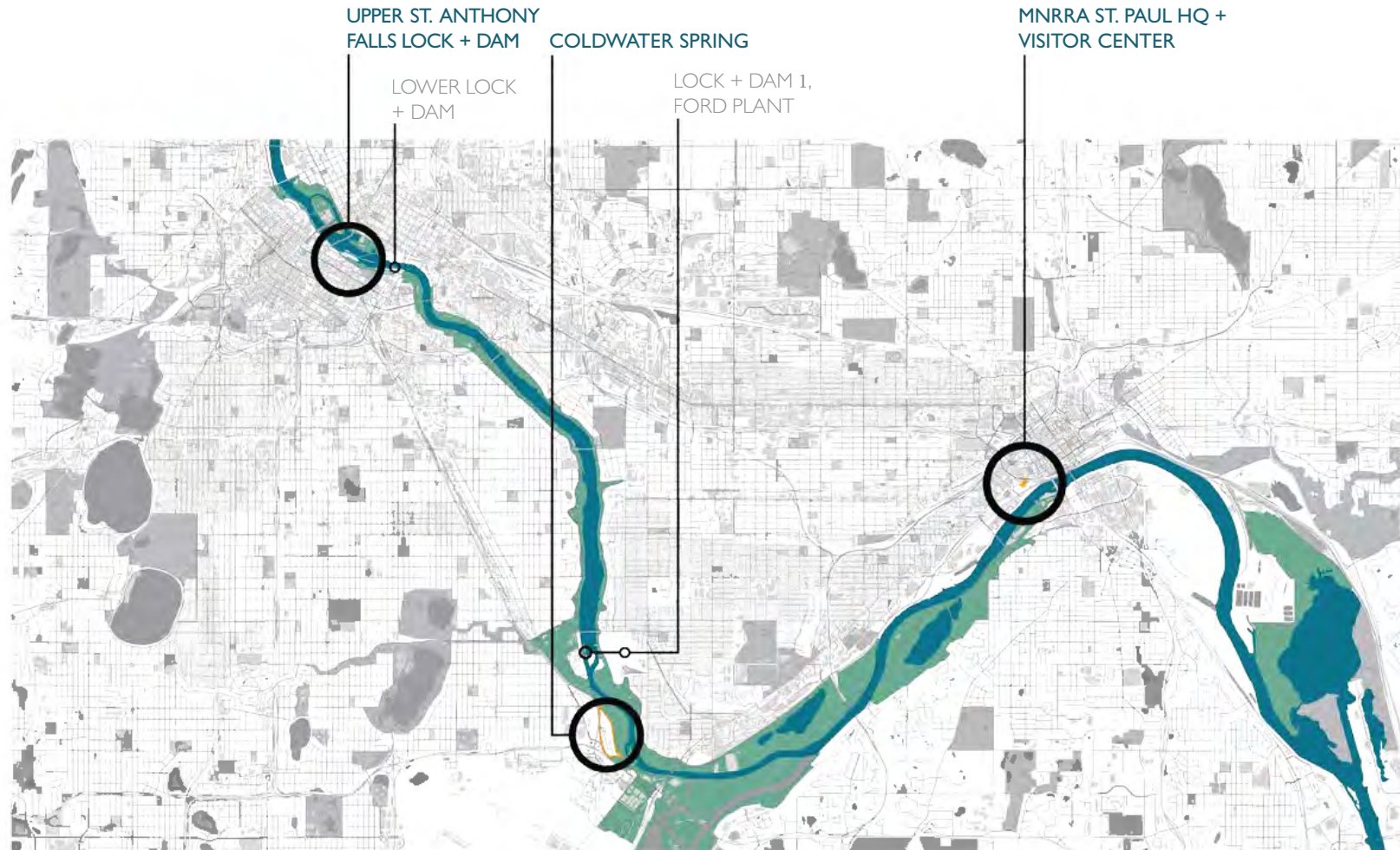
This rich history and the unique American stories that are central to the mighty Mississippi led to Congress designating the Mississippi National River and Recreation Area (MNRRA) in 1988. The national park was designated to "protect, preserve, and enhance the nationally significant historic, cultural, natural, scenic, recreational, scientific and economic resources of the river."

MNRRA is a partnership park in the National Park System because the park service owns very little land along the river, which flows through 25 communities of a major metropolitan area. It is comprised of a 72-mile corridor from Dayton and Ramsey in the north to just below Hastings in the south. Over this stretch, the river's character changes more than anywhere else along its entire 2,350-mile course.

In 2014, another Act of Congress led to the closure of the Upper St. Anthony Falls Lock in 2015 in order to stop the upstream migration of Asian carp. Minneapolis had already closed its shipping terminal north of the lock, recognizing that the land above the falls would be more valuable for businesses, housing and parks.

Today, you can still see the physical remnants of history in the mill ruins along the city's Central Riverfront. The mill ruins, the Stone Arch Bridge, and now the lock have all found new uses while preserving the city's heritage.





*Land ownership along the Central Riverfront is a patchwork of public and private entities, making coordination and cooperation vital to the success of any new project.*



1. US Government (Army Corps of Engineers)
2. Minneapolis Park & Recreation Board (MPRB)
3. Minnesota Department Of Transportation (MnDOT)
4. City Of Minneapolis
5. Xcel Energy
6. University Of Minnesota
7. CenterPoint Energy

## LAY OF THE LAND

The Upper St. Anthony Falls Lock and Dam is in an area known as the Central Riverfront, within a linear section of the Mississippi in downtown Minneapolis. The dam is owned by Xcel Energy, which operates a hydropower plant on the east side of the river. The lock is owned by the Army Corps of Engineers and is located adjacent to the falls at about the midway point of MNRRRA's 72-mile corridor. This area of the riverfront is an epicenter of activity for the City of Minneapolis and the site of significant new growth and development over the last 20 years.

A renovated visitor center for MNRRRA in downtown St. Paul opened in 2016 during the centennial of the National Park Service. New exhibits and programs, housed in the Science Museum of Minnesota, now attract more than 180,000 visitors each year.

Coldwater Spring, a 2010 addition to the national park, features a walking trail popular with birders. The park service is renovating the oak savannah and prairie complex within the site, which was historically an important crossroads for Native Americans and traders using the Mississippi and Minnesota rivers for commerce and travel.

The lock can now provide a third anchor for the National Park Service along the river.

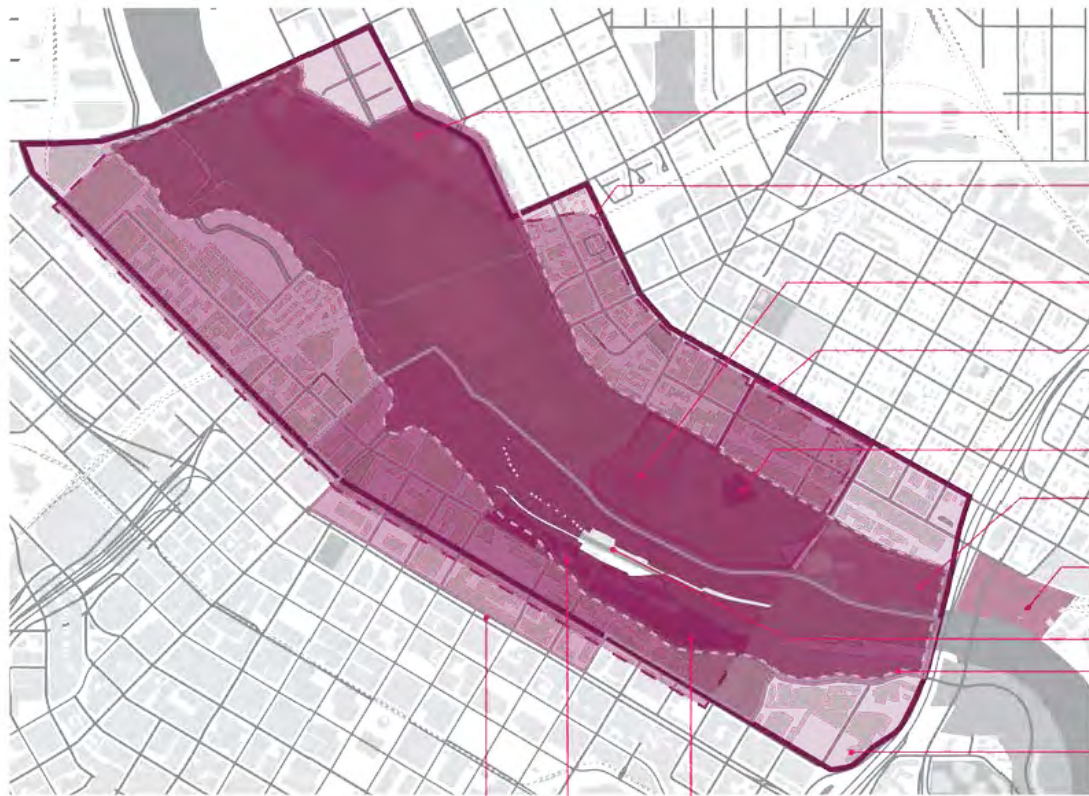




# TRANSFORMING THE LOCK

A vision for a new national park visitor experience on the Mississippi River





## CENTRAL RIVERFRONT PLANNING STUDIES

BOOM ISLAND / BF NELSON  
RENOVATIONS - 2011

ST ANTHONY FALLS  
HISTORIC DISTRICT  
GUIDELINES - 2012

XCEL ENERGY WATER POWER  
PARK REC PLAN - 2010

OUR CHANGING  
RELATIONSHIP WITH THE  
POWER OF THE FALLS - 2013

EAST FALLS STUDY - 2010

USACE WHITEWATER  
PARK PLAN - 2012

UofM ENERGY PLAN

LOCK + DAM, 2016

REGIONAL PARK  
BOUNDARY - 2014

POWER OF THE FALLS - 2009

MILL RUINS PARK - 1991  
WATERWORKS  
2012, 2015, 2016

OUR CHANGING RELATIONSHIP  
WITH THE POWER OF THE FALLS  
- 2013



## CREATING THE VISION

Over the past 30 years, many planning studies of the St. Anthony Falls region have been conducted, but few have referenced the lock. It has often been rendered as a void, not because of poor planning, but because the role of the lock and its navigational responsibilities seemed permanent. However, when the Upper St. Anthony Falls Lock closed in 2015, it opened up new opportunities for the riverfront.

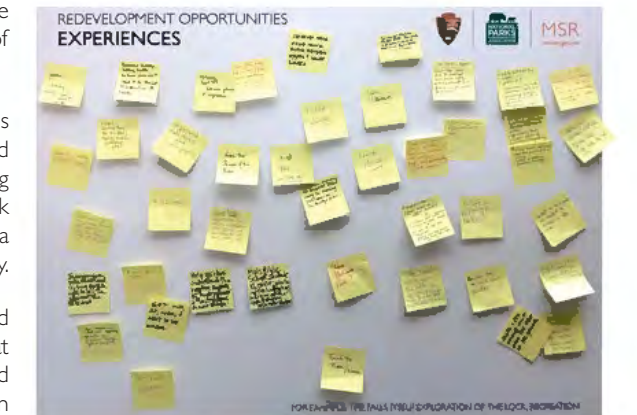
In response to this opportunity, the National Parks Conservation Association and MSR brought together a wide-ranging group of stakeholders to envision a new future for the lock and our national park. Working with the National Park Service, the Army Corps, Minneapolis Park and Recreation staff and board members, 10 Thousand Design, Exponent, area residents, elected officials, small businesses and local institutions, these organizations started to think about the possibilities of a unique visitor experience on the doorstep of our national park.

Using an integrated approach that focused on research, analysis and community engagement, all the planning studies completed for this part of Minneapolis were first reviewed. Existing conditions and feasible options for this potential national park visitor center were analyzed as well. And given the lock is a community asset in a national park, public engagement was key.

The public was involved in three ways: First, NPCA conducted surveys to understand how aware riverfront visitors are that they are visiting a national park. The public was then invited to a community meeting that was attended by more than

150 people who provided their ideas for what they wanted to see, do and experience at the lock. Next an advisory team was formed and included nearly 40 people who were already involved in the riverfront and downtown area. This team provided ideas and feedback and helped to ground the final guiding principles in reality. Finally, students from River's Edge Academy provided their unique perspective on the prospects of the lock.

The ideas in this book represent the culmination of great teamwork and group thinking to arrive at the vision for this new opportunity in the heart of the Mississippi National River and Recreation Area. Challenges lie ahead, but all great, collaborative ideas involve hard work and dedication to become reality.







## OUR NATIONAL PARK

“It’s already world class. It’s a national park.  
It just needs branding as such.”

Jeff Johnson  
*Minneapolis Convention Center*



## GUIDING PRINCIPLES

### Establish the lock as a centerpiece of the Central Riverfront

- Use the national park as a magnet to draw visitors near and far
- Ensure that the design meets new uses while honoring preservation

### Leverage the power of the National Park Service brand

- Use the internationally recognized arrowhead with pride
- Tap into new funding sources to realize the vision

### Invite the community in!

- Build strong, local awareness of the neighborhood national park
- Create amenities to benefit the community as well as visitors

## ENHANCE CONNECTIONS

Since it was established in 1916, the National Park Service has preserved our iconic national treasures and has become the official storyteller of our nation's history. During the first hundred years, the park service protected more than 84 million acres of land and water in all 50 states. But a vast majority of the more than 400 national parks in the system are in out-of-the-way locales.

As national parks enter their second century, growth and innovation will occur in our urban parks – in places like Minneapolis-St. Paul and in parks like Mississippi National River and Recreation Area. Part of the park service mission includes connecting to local communities.

With the renowned Minneapolis Parks and Recreation Board Parks, Stone Arch Bridge, Mill City Museum, Commons Park and U.S. Bank Stadium all nearby, it seems all roads lead to the Central Riverfront and the lock. And with the potential of the National Park Service to act as a magnet for visitors, many possibilities exist to enhance tourism.

It's time to physically and visually connect all pathways to the Central Riverfront and to a national park visitor center at the lock.

*Park Ranger led tour inside the lock north wall*





EAST BANK

9 MIN WALK

GUTHRIE THEATER  
ST. ANTHONY  
FALLS LOCK

5 MIN WALK

WATER WORKS

2 MIN WALK

GATEWAY PARK

14 MIN WALK

GOLD MEDAL PARK

7 MIN WALK

MILL RUINS  
MILL CITY MUSEUM

3 MIN WALK

THE COMMONS

6 MIN WALK

LIGHTRAIL

NICOLLET MALL





## HONORING PRESERVATION

With any new or enhanced uses – such as a visitor center – come new demands. National park visitors and local residents will need amenities at the lock that currently don't exist, such as parking, restrooms, small shops and a restaurant.

The lock is on the National Register of Historic Places, a designation awarded by the National Park Service, and any new construction or renovation of the existing structure needs to reinforce the building and site's integrity. The views from the east and west toward the lock, as well as the up- and downstream river views, will need to be maintained to honor the site's history while accommodating modern needs.

The lock keeps company with some very high profile partners: Stone Arch Bridge, Mills Ruins Park, Water Works Park all in the St Anthony Falls Historic District. This historic preservation ethic needs to continue throughout the area.

- Existing view of the river from Guthrie Theater
- Avoid obstruction of river view

*Proposed visitor center should consider surrounding viewsheds of the river and falls. For example, new construction on top of the existing lock structure would increase view obstruction from surrounding landmarks.*





## POWER OF THE ARROWHEAD

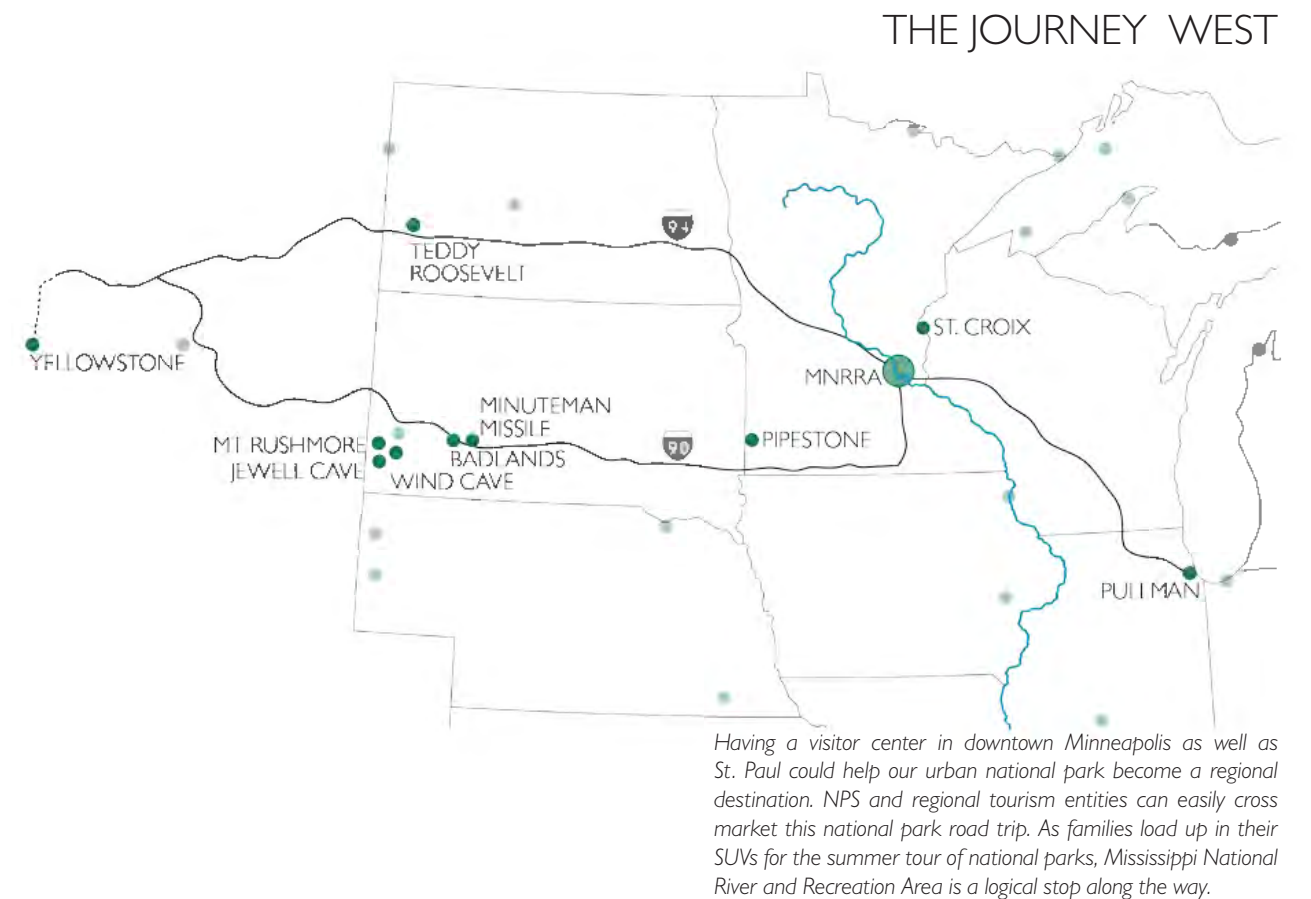
In the summer of 2016, NPCA surveyed visitors to the lock during the first year that the National Park Service offered tours of the site. They found that 65 percent of people had no idea they were in a national park despite the fact half of the visitors were from the metro area.

The National Park Service arrowhead is a universally recognized and revered symbol and has been proven to increase tourism. For example, an Ohio congressman introduced a bill in 2015 requiring all highway signs near one of the state's eight national parks also display the arrowhead symbol as an "easy way to boost tourism in Ohio." That same year, a West Virginia tourism council embarked on a massive marketing campaign to "harness the power of the National Park Service branding to drive visitors where there are three national parks nearby."

The NPS arrowhead can also attract funding. The park service has access to many sources of funds outside of a park's operational budget that would otherwise be unavailable but for the national park. For example, MNRRRA has been successful in leveraging federal transportation funds for a number of projects in the park corridor. These and other funds may be useful in realizing the vision for the lock.

It's time to display the arrowhead proudly and welcome the visitors who are sure to follow.

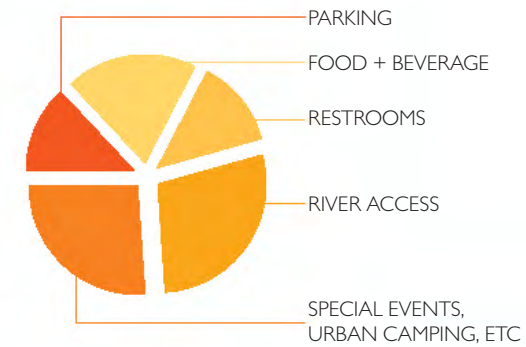








MNRRRA partners with many local organizations to deliver experiential and educational programs on the river.



## AWARENESS, COLLABORATION & COMMUNITY BENEFIT

Over time, the lock will need a lot of work and significant funding to create new public spaces on the river. But there is no need to wait until all the funding is in place to make improvements and create greater access.

Cross-marketing tours and programs with nearby institutions and during events will help raise the profile of the lock as a visitor attraction. And capitalizing on the many neighborhood and community networks will help get the word out to residents.

In the short term, collaborative programs will help raise the profile of the lock as a community resource. With many downtown and neighborhood groups nearby, opening the doors to community meetings and small events could provide a service while increasing awareness about the lock.

With greater awareness comes appreciation and support, which will be critical in order to fund long-term improvements.



During public meetings, people expressed interest in improved amenities. Access to the riverfront topped the list, followed by new programs and restaurants.



## PARK EXPERIENCE

“My favorite part is the dam control room where we got to try the buttons and sound the horn. It made me interested in actually becoming an operator.”

John “JJ” B.  
*student, River’s Edge Academy*



## GUIDING PRINCIPLES

### Tell the unique historic, cultural and natural stories of the river

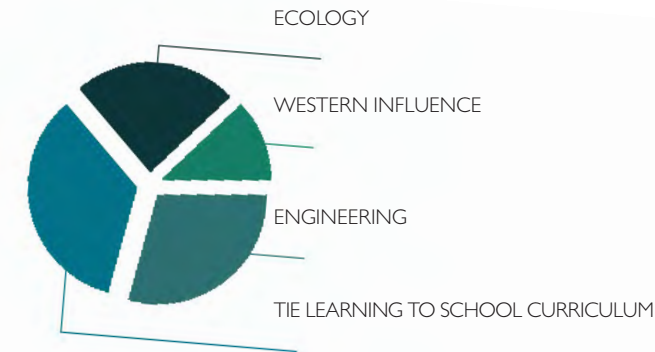
- Identify storytelling opportunities not told at nearby parks and museums
- Recognize the river's legacy in navigation with the U.S. Army Corps of Engineers

### Develop new and dynamic ways to tell stories

- Expand the capacity of storytelling through flexible technology
- Provide interpretation both inside and outside the lock

### Develop programs that broaden the site's relevance

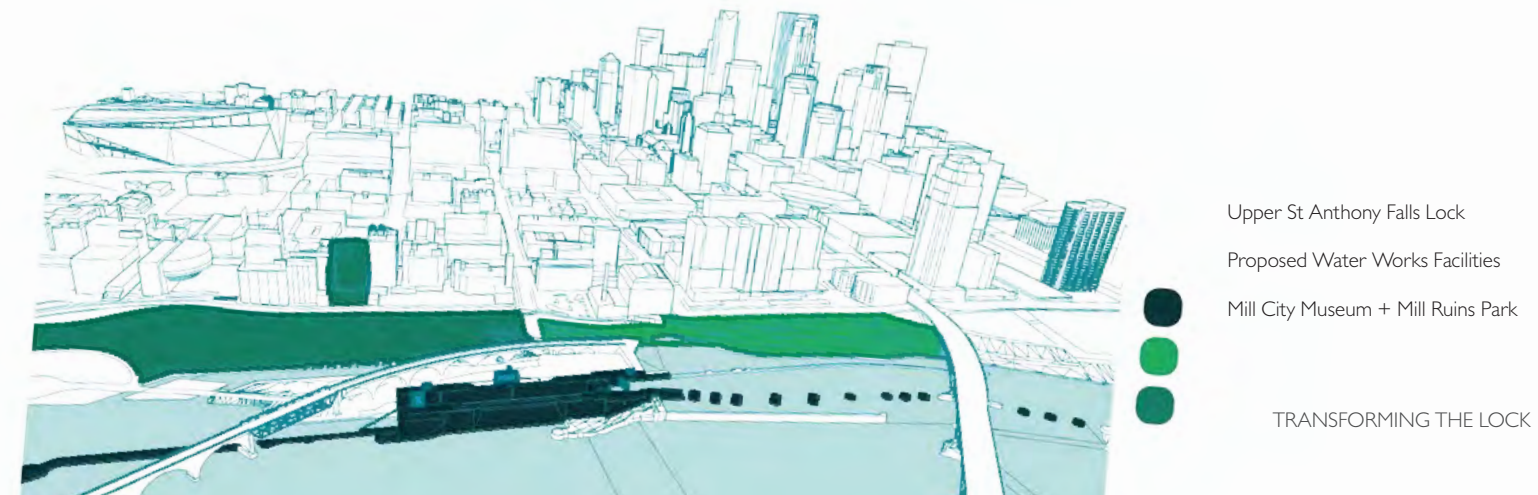
- Create public programs and events to reach visitors, residents and nearby workforce
- Increase programs and access during off-peak times and winter



## LEARNING

The riverfront is alive with cultural institutions that tell stories of the past – the Mill City Museum is the most established and interprets the city's milling history. Mill Ruins Park, University of Minnesota, and Guthrie Theater also play an important part in conveying the riverfront's history, as will the proposed Water Works site. Stories that are natural to interpret at the lock include transportation, engineering and commerce, as well as ecology and the environmental importance of clean water.

Most people who participated in public or small group meetings wanted to learn about engineering and navigation and to see how the lock works. They also felt that these stories would be valuable for students of all ages.



“As soon as I saw the control panel, I knew we could make a working model of it for younger kids.

A small-scale model, built into a water table, would allow kids to close and fill the lock, move boats in and out, then drain the lock. It could become part of a ‘Little Lockmasters’ program.

For older kids, we might consider remote control barges and boats in the river that can maneuver into a working 1:50 scale model of the lock. And everything could be linked to a STEM education curriculum in area schools.”

Ed Bennett  
*10 Thousand Design*



## MAKE IT INTERACTIVE

When students from River's Edge Academy toured the lock, they had an overwhelming desire to push buttons, pull levers and turn the wheels. They wanted to work the lock. The Army Corps of Engineers has owned and operated the Upper St. Anthony Falls Lock since it was built. The Corps still owns the facility and must determine its future use. In the meantime, the Corps and NPS offer visitor tours.

The lock could provide a unique opportunity for students of all ages to learn about engineering on the water. Even the youngest visitor can have an interactive experience through special programming and exhibits.





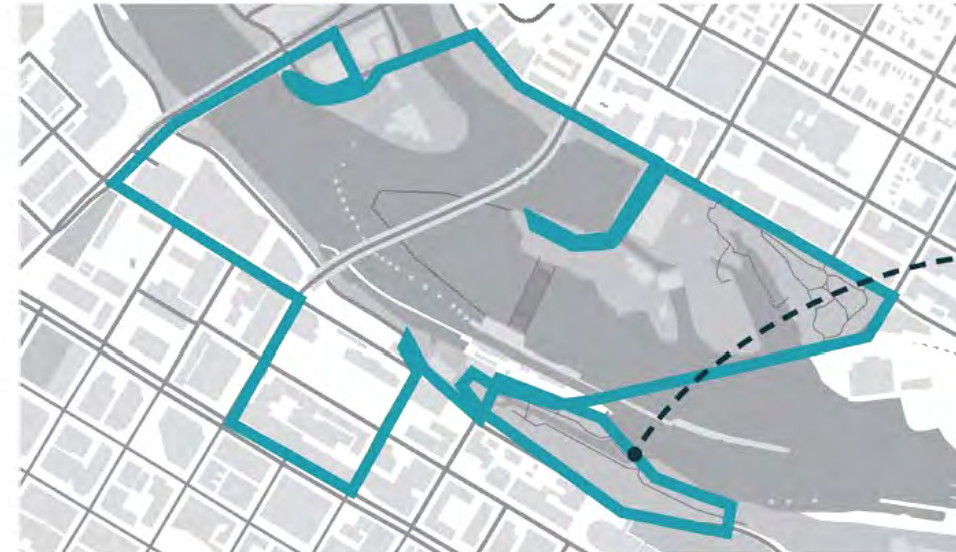
Existing lock buildings can be used as theater space showcasing the history of the falls and region.

above: existing view  
below: theatrical, pre settlement view of falls

## USING TECHNOLOGY

A walking app, coordinated with other groups that have a role in telling the stories along the river, would allow visitors to navigate through downtown, over the bridges and through the St. Anthony neighborhoods to better understand the rich history of the area.

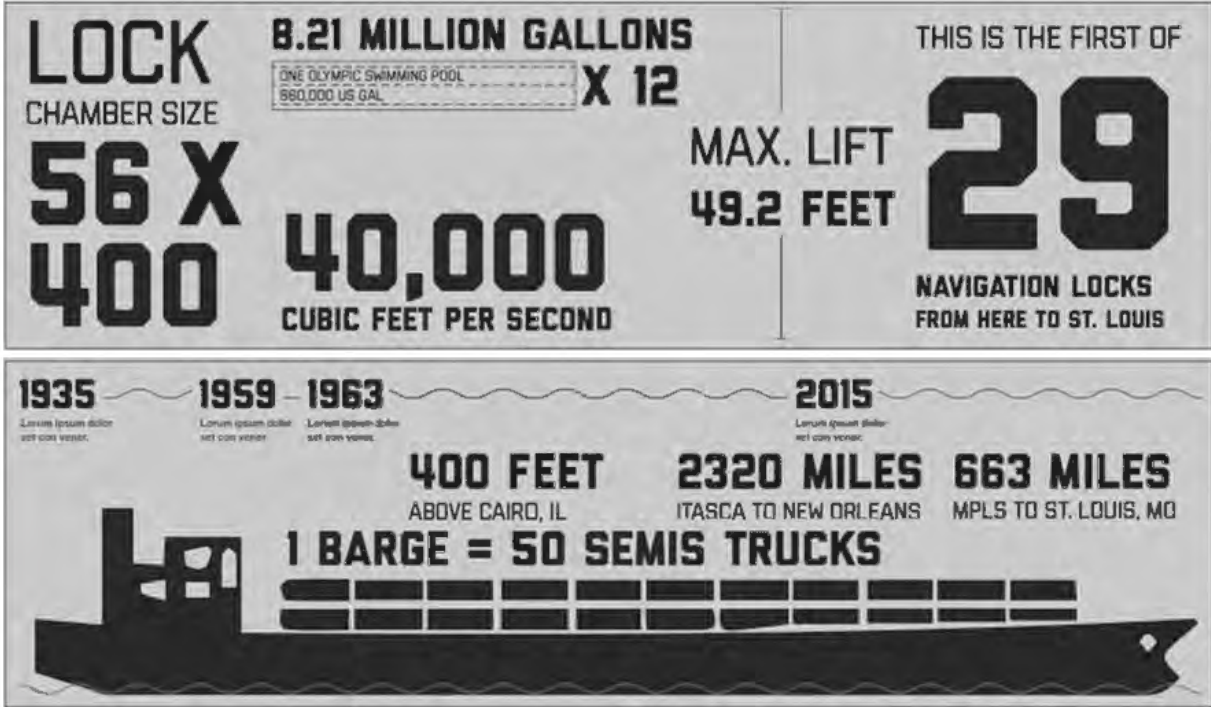
Location-based notifications could alert listeners to 40 points of interest along the walk. Hear the buzz of the sawmills and bells and horns of the boats entering the lock. Listen to conversations of early Minneapolis residents. The narrator could explain the connection to the falls in Native American history and the rise of downtown Minneapolis through the centuries.







## GRAPHIC INTERPRETATION



Using the lock as surfaces for interpretation allows visitors to experience size and scale.

Above is one idea for graphics on the lock walls and left is a rendering with a graphic.





## DESIGN & ACCESS

“I want to feel the power of the river.”

“Hear the sound of the falling water.”

“Walk out over the spilling.”

“Touch the river!”

Voices from the Community



## GUIDING PRINCIPLES

### Design safe and continuous access for visitors

- Establish clear and friendly pedestrian pathways
- Connect the Stone Arch Bridge and Water Works Park to the lock
- Improve adjacent bike trails and provide connections

### Develop new physical features for on-the-river experiences

- Provide access to outdraft barrier
- Open access to lock interior and adjacent falls
- Create access to mooring pylons
- Create large green space for community gathering and events
- Ensure kayak and canoe portages

### Develop a comprehensive Central Riverfront transportation plan

- Ensure consistent and clear signage from major attractions
- Plan for increased visitation with access for tour and school buses
- Improve transit alternatives
- Improve the Portland Avenue / West River Road intersection

## START WITH WHAT'S THERE

Big changes can often provide equally big opportunities, and such is the case with the closing of the Upper St. Anthony Falls Lock.

When the lock was opened in 1963, the milling industry had already greatly declined. Bringing navigation above St. Anthony Falls had potential economic advantages for the city. However, the upper lock failed to entice substantial economic investments above the falls. And with its closure, the lock no longer serves navigation. Now this grand old structure is ready for a new use and offers an incredible base on which to build.

At over 500 feet long, 100 feet wide and 50 feet tall, the lock's scale dwarfs a visitor. The quantity of concrete used to build the lock would never be used in building a new visitor center or park and should be fully maximized. The scale and location offer unique perspectives of the river; and the mooring pylons and outdraft barrier provide access to the river's dramatic elevation change. Any proposed visitor center at the lock should first embrace the unique properties of the lock itself, then take on design elements that enhance the lock's core attributes.

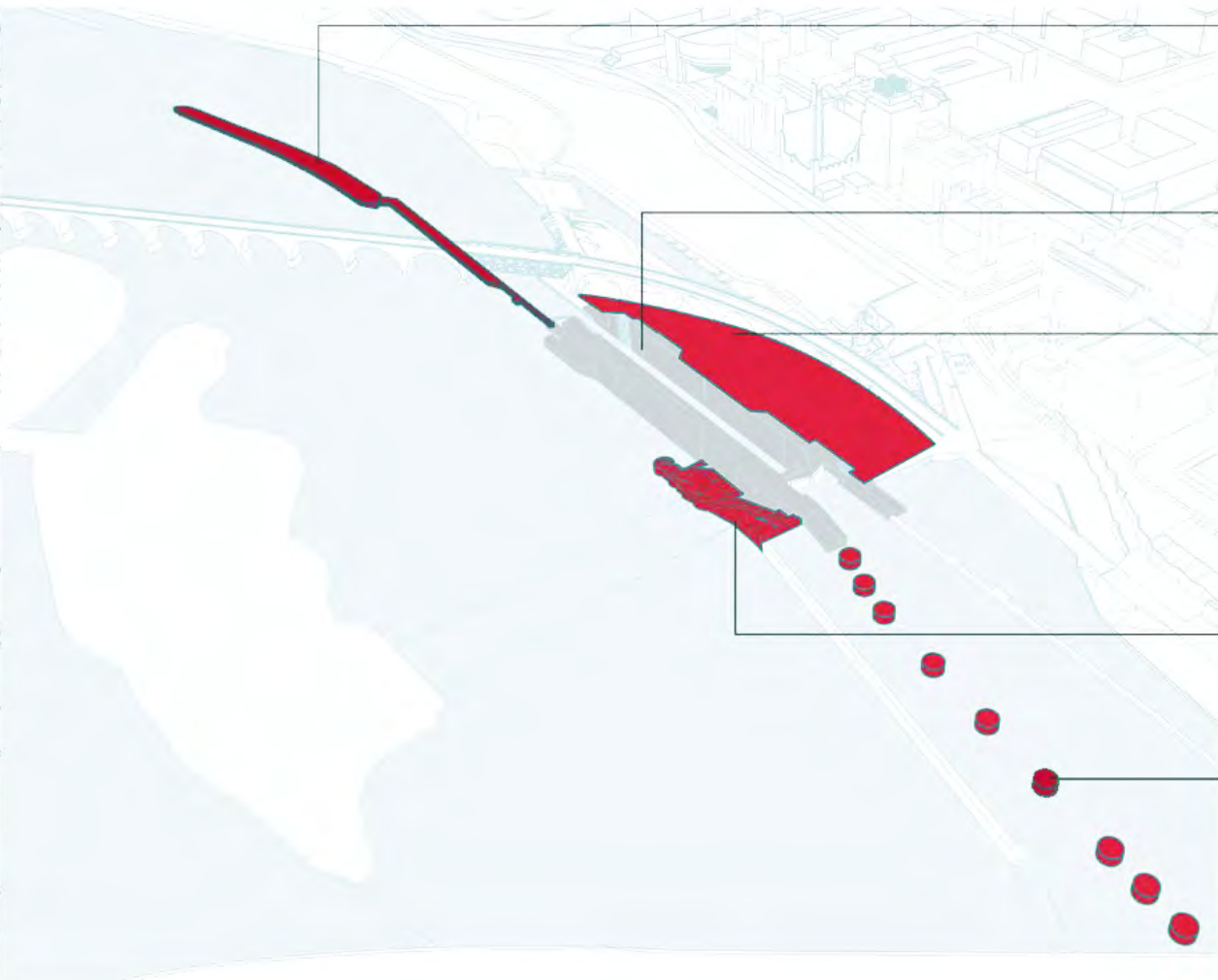
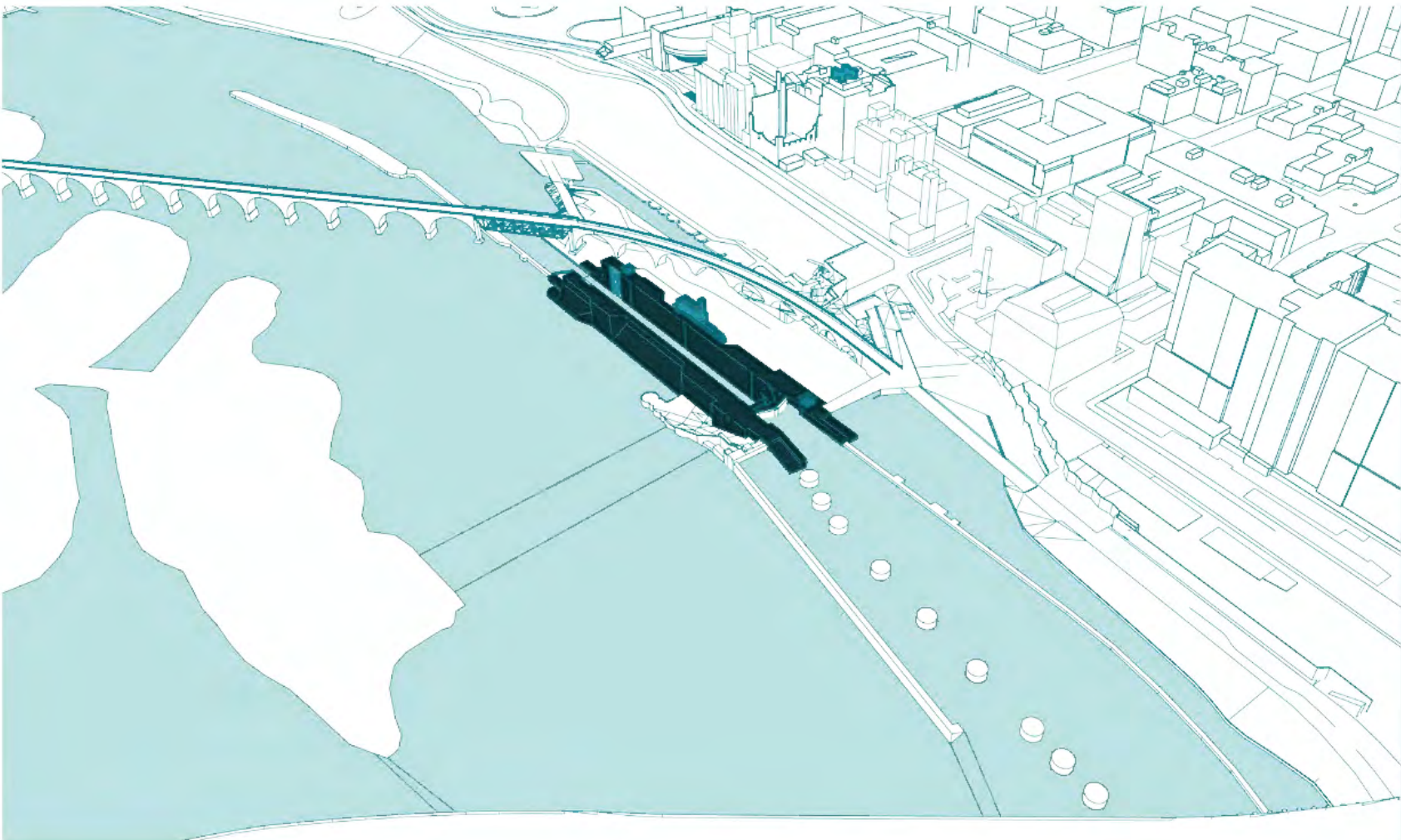
Transforming the lock is one of a long line of great opportunities for creating new public spaces in urban areas. Industrial land in cities was often located near rail corridors, lakes or rivers, and as industry has subsided, these parcels are often developed into public parks. Even as far back as

1876 when a former limestone quarry was converted to a Paris park, former working sites have been turned into public parks. The 1.5-mile Highline in New York City built along a non-working rail corridor is a recent example of these conversions.

The creation of recreational sites in former working urban landscapes allows for construction at scales beyond what would be obtainable for new park projects. The lock provides a great foundation from which to create a new public space and national park visitor experience.



Focus design to provide “on-the-river experiences.”



**OUT DRAFT BARRIER**

Provides access to the water below the falls and below the Stone Arch Bridge.

**LOCK WALLS**

Provide access between lock walls

**OPEN LAND / GREEN SPACE**

This 70,000 square foot area is currently a parking lot and lock accessory building. By converting most of this area to green space, it would become a prime location for visitor center programming and community events.

**LAND REMNANT**

Provides up close access to the power of the falls.

**MOORING PYLONS**

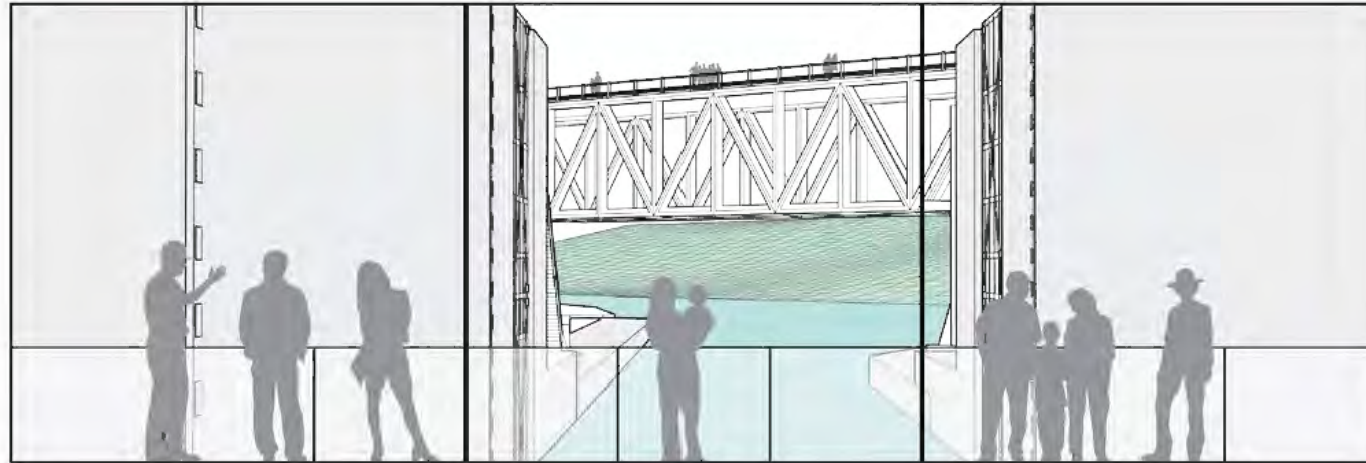
Provides access to the river above the lock.



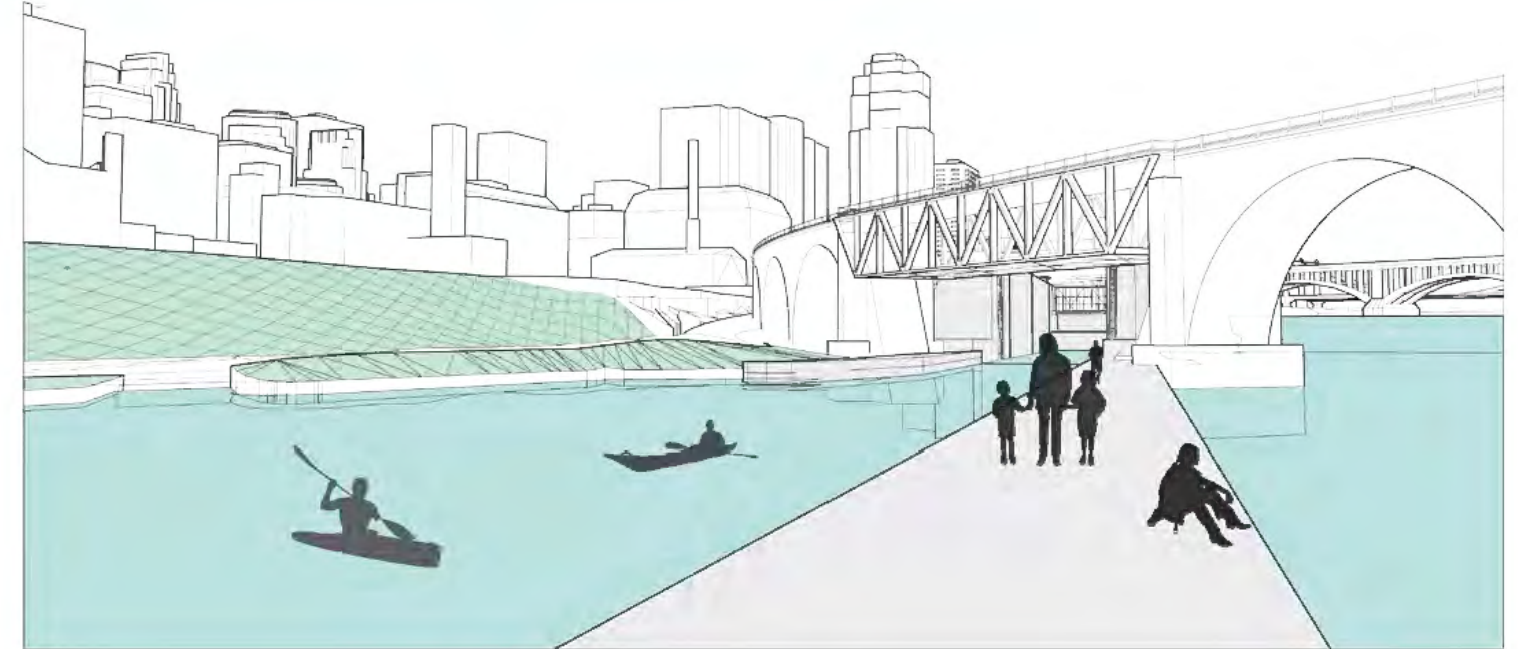


*The outdraft barrier sits in the pool between the upper and lower locks and extends beneath the Stone Arch Bridge downstream towards the lower lock. Providing public access to this area will bring unique views for visitors, such as seeing between the lock walls toward the bridge. People could stroll along the barrier close to kayakers and other recreational users.*

## BETWEEN LOCK WALLS



## OUTDRAFT BARRIER





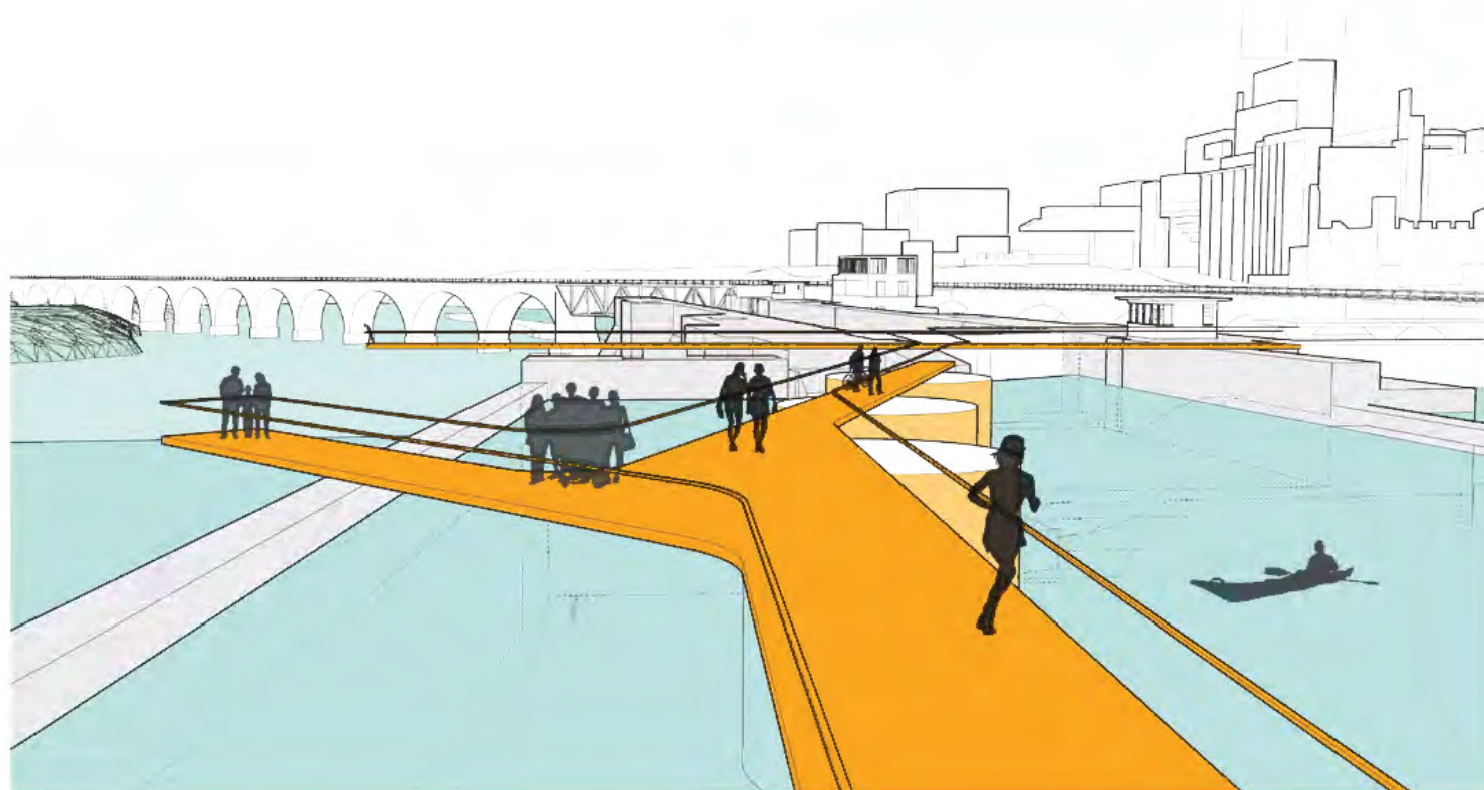


The mooring pylons extend from the lock toward Nicollet Island and could provide structure for a pedestrian bridge.

A small remnant of land to the east of the lock is all that remains of Upton Island. Protected public access can provide up close experiences of the power of the falls.

## MOORING PYLONS

## LAND REMNANT

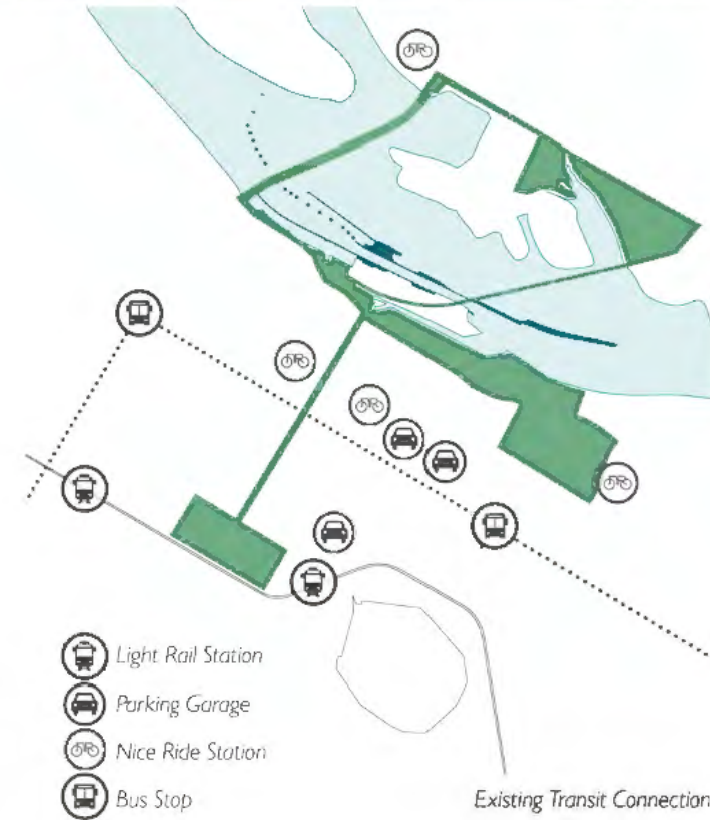
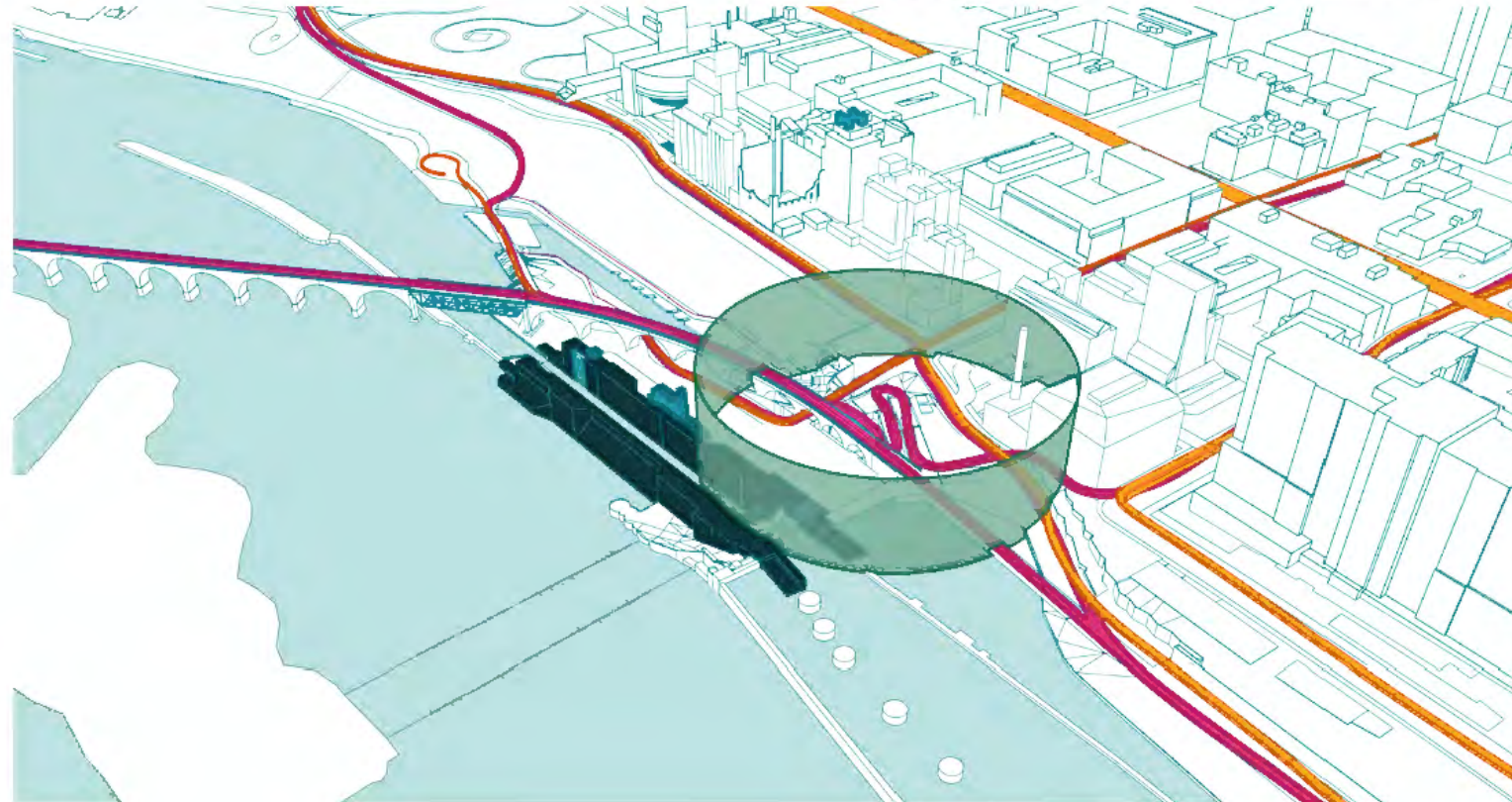




Paths and intersections near the lock are crowded, congested and potentially unsafe for pedestrians and cyclists.

Many roads and paths converge at the lock making navigation difficult.

- pedestrian
- autos



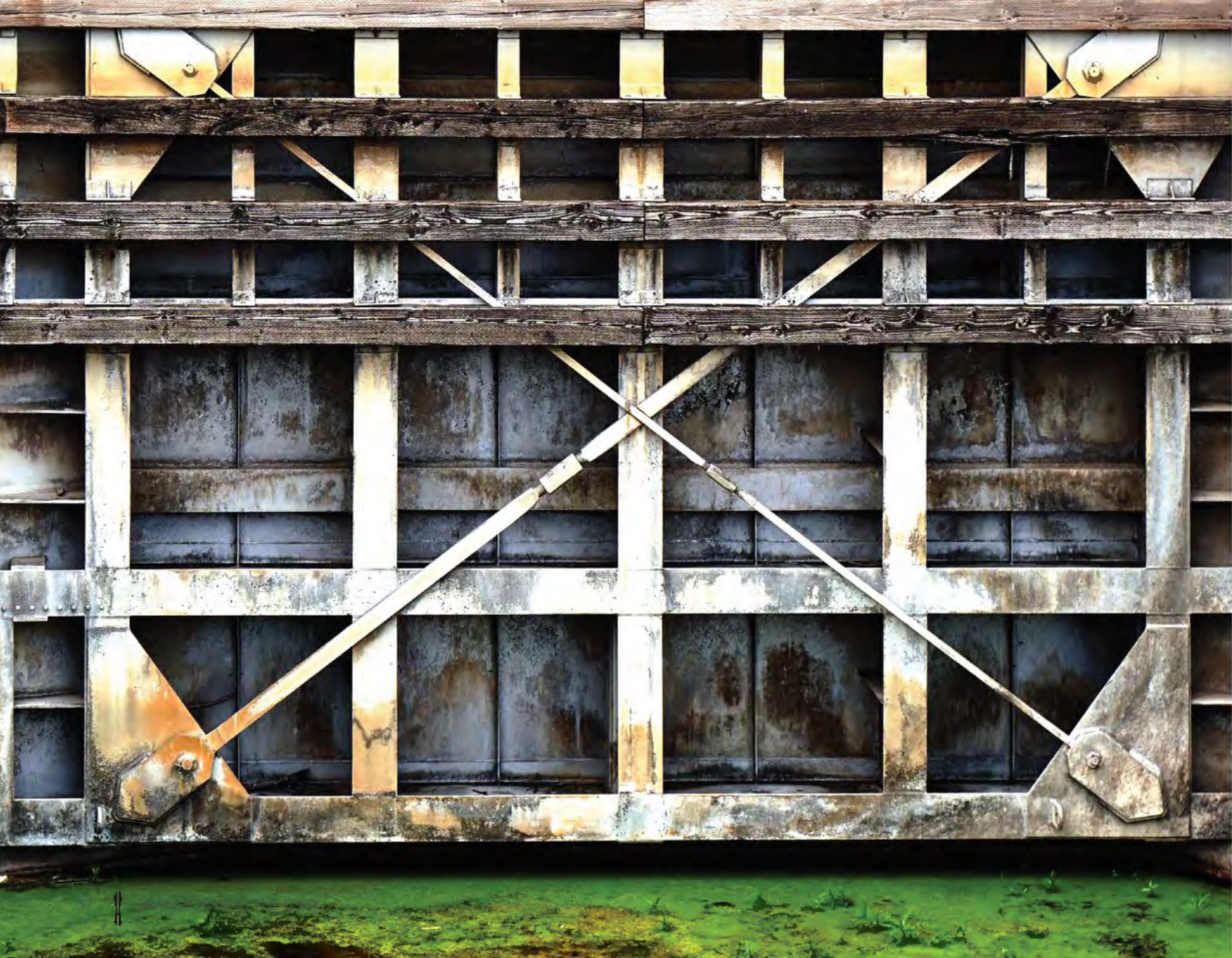
## TRANSPORTATION

With the heightened interest in the lock, Water Works, RiverFirst and nearby development, it's time to develop a comprehensive Central Riverfront transportation plan. The riverfront is a magnet for residents, downtown workers and visitors. All roads and pathways converge at the lock, but because it was only recently envisioned as a visitor attraction, getting to and from the lock was never included in transportation planning. A comprehensive plan can help remedy these issues and outline projects that benefit the community and the park visitor.

This plan should be done in conjunction with the many interests at play along the river, including the National Park Service. It should take into consideration:

- Clear and consistent signage from major attractions to the river;
- Bicycle and pedestrian safety;
- Transit alternatives and navigation from transit to the river;
- Access for tour and school buses;
- Increased parking needs; and
- Provide access for all.





## MOVING FORWARD

“We should have a base for the National Park Service in our city. They chose St. Paul for the headquarters. It would be great to see them have another home in the City of Minneapolis.”

Barb Johnson  
*Minneapolis City Council President*



The ideas in “Transforming the Lock” are meant to be more visionary and less prescriptive. Some of the ideas will be relatively easy and cost effective to implement, like cross promoting tours to increase awareness and a walking app that gives visitors a comprehensive knowledge of area history and attractions. Some will take collaboration and commitment from government and private sectors, such as a comprehensive Central Riverfront transportation plan. Most ideas will need funding that isn’t in place yet.



*image courtesy of Star Tribune*

## OWNERSHIP

Fundamental challenges will need to be resolved regarding ownership of the lock, so that new uses and physical changes to the building can occur. The Army Corps of Engineers has owned the lock since it was built, and now that it is closed, they must follow a required process to determine their interest in the lock going forward. The Corps plans to complete a study that will evaluate several options that range from continuing operations as they are now; turning the facilities over to other federal, state or local entities; or removal. The outcome could lead to the lock changing ownership, and it is unclear what entity could step forward to own and maintain this asset. In the meantime, the Corps and the National Park Service have an agreement in place until 2021 allowing for ranger-led tours.

Although it’s critical to identify a path of ownership that enhances the National Park Service at this great asset within park boundaries, it is not essential that they own the lock.

## DEVELOPMENT

The section of the Mississippi within about a half mile of the lock is a highly developed part of the riverfront with more work in planning stages. The projects of RiverFirst and Water Works are well vetted and have tremendous public benefit and support. There is a proposed hydroelectric development, however, that has far less public support and could threaten the vision for the lock and any new on-the-river visitor experiences.

A majority of people who participated in public meetings for “Transforming the Lock” were very concerned about the hydro plant that could be sited adjacent to the lock in order to draw on the power of St. Anthony Falls. The project has been discussed for many years but has been unable to proceed because the project failed to secure the necessary real estate agreements with the Minneapolis Park and Recreation Board. Recently the company that has proposed the plant applied for a license amendment from the Federal Energy Regulatory Commission in order to relocate the project to Corps-owned land at the lock. If a power plant project is permitted and built there, it may preclude many of the proposed activities envisioned for in and around the lock, including kayak and canoe launches and public access to the riverfront.

PULLING TOGETHER

At the root of this vision is the need for a unified voice from all people with a stake at the riverfront – people who live and work there as well as those who provide for the visitors to Minneapolis and to this national park. Many park partners can help bring these voices together toward achieving the vision. Groups like the Mississippi Park Connection, Wilderness Inquiry, Friends of the Lock and Dam and National Parks Conservation Association all play a critical role. Others such as Meet Minneapolis, Minnesota Historical Society and Mill City Museum contributed to this vision and are in a unique position to draw visitors to the site.

Neighbors of the lock will be critical in moving ideas forward, including St. Anthony Falls Heritage Board and Downtown Minneapolis Neighborhood Association. At the center of making this vision a reality are all government entities and elected officials, including the City of Minneapolis, Minneapolis Park and Recreation Board, the mayor, city council and state representatives. Members of the Minnesota Congressional delegation, led by Senator Amy Klobuchar and Congressman Keith Ellison, paved the way for this opportunity and will be instrumental in making the vision a success.

For every challenge, there is a path toward a solution. The people who worked together to develop this vision must work together in realizing it and making the Upper St. Anthony Lock and Dam a truly world class national park destination.



FUNDING

The National Park Service is already grappling with underfunding, staff shortages and an \$11 billion repair backlog, despite a 19 percent increase in visitors between 2011 and 2016. MNRRA in particular needs a base budget increase to staff and maintain new assets, such as Coldwater Spring. All national parks have many unmet needs due to chronic underfunding, and it will be challenging to secure additional staff, operating and construction resources at the lock. Despite these challenges, it is clear that there is strong community support for MNRRA to have a presence at the lock as demonstrated through the efforts of volunteers and philanthropic partners who have helped make that happen the last few years.

Federal funding isn't the only funding challenge along the riverfront. There are many active projects along the river and in downtown Minneapolis: RiverFirst, Water Works and The Commons are a few. Each civic project has its own fundraising goal and demand for public dollars. It will be important to tap into new funding sources in realizing the vision at the lock and to respect local philanthropic efforts.

The National Park Service has many sources of funding outside of individual park operations and construction budgets. Mississippi National River and Recreation Area has been successful tapping into some of these funding opportunities in other areas of the park.

PROGRAM	SOURCE	DESCRIPTION
Bus and Bus Facilities Formula Grants (sec.5339)	Federal Transit Administration	Funds can replace, rehabilitate and purchase buses and construct bus-related facilities.
Centennial Challenge	National Park Service	30/50 match program funds projects that improve visitor services, outreach, partnerships and bridge connections to communities.
Clean Cities Initiative	Department of Energy	Funds alternative vehicles, other improvements and transportation projects that educate visitors on cutting petroleum use and vehicle emissions.
Congestion Mitigation/Air Quality Program (CMAQ)	Federal Highway Administration	Program provides funding for transportation projects, programs, and operational strategies that reduce vehicle congestion and air pollutants.
Federal Lands Access Program (FLAP)	Federal Highway Administration	Provides funds for projects to improve transportation facilities that provide access to, or are located within, federal lands.
Federal Lands Planning Program (FLPP)	Federal Highway Administration	Funding to implement transportation planning for facilities that are consistent with the Statewide and Metropolitan transportation planning procedures.
Federal Lands Transportation Program (FLTP)	Federal Highway Administration	Funds (in three categories) to improve the transportation infrastructure owned and maintained by Federal Lands Management Agencies, including NPS and Army Corps of Engineers.
Targeted Accessibility Improvement Program (TAIP)	National Park Service	The TAIP provides funds to park units to begin comprehensive physical and programmatic accessibility upgrades of specific sites within those units.
Helium Act	National Park Service	Pays federal funding share of cost-share agreements for deferred maintenance and to correct infrastructure deficiencies (through FY19).
Nationally Significant Federal Lands and Tribal Projects	Federal Highway Administration	Provides funding for the construction, reconstruction, and rehabilitation of nationally significant projects on Federal or tribal lands.
Repair and Rehabilitation (RARE)	National Park Service	Funding to repair, rehabilitate, maintain and in some cases replace assets that parks have identified as critical to their mission.
Surface Transportation Program	Federal Highway Administration	The program provides grants to States to demonstrate user-based alternative revenue mechanisms that utilize a user fee structure to maintain the long-term solvency of the Highway Trust Fund.
Transportation Investment Generating Economic Recovery (TIGER)	U.S. Department of Transportation	Tightly competitive grant program supports innovative projects, including multi-modal and multi-jurisdictional projects, which are difficult to fund through traditional federal programs.
Urban Area Formula Grants (sec. 5307)	Federal Transit Administration	Funding for transit capital and operating assistance, and for planning.
Transportation Alternatives Set Aside	Federal Highway Administration	Funds the construction and rehabilitation of paved, multi-use trails and historic transportation facilities like bridges.
Recreational Trails Program (RTP)	Federal Highway Administration	Funds the development, maintenance and restoration of recreational trails, including bike trails.
Formula Grants for the Enhanced Mobility of Seniors and Individuals with Disabilities (sec.5310)	Federal Transit Administration	Funding to states for assisting nonprofit groups to meet transportation needs of older adults and people with disabilities.



MSR



Subject: [Non-DoD Source] Comments of Friends of the Riverfront

Friends of the Riverfront wishes to first commend Corp staff for the excellent public presentations that they gave, and their willingness to answer any and all questions.

As many of points that we might have raised are well covered by Friends of the Lock and Dam and others, we are mainly focusing our comments on the scope of the area to be studied..

### Scope Clarification:

We ask that area below the Falls that is to be studied for divestment as part of the USAF be clarified.

Throughout Minnesota history fierce legal battles have been fought over the ownership of land, including on Nicollet Island and Hall's Island, that was revealed or submerged due to various manmade manipulations around the Falls,

As the graphic below shows in yellow, there is significant property that the Corp owns in fee that is currently underwater.

This includes part of what had been Hennepin Island and lands along the shore.

In addition, the rock dike is shown as a “structure” owned by the Corp that is part of the USAF, but only a small piece of the dike may be on Corp owned land and that land is shown as part of a submerged island.

There may be changes from the closure of USAF such as land formation from the cessation of dredging around these now submerged islands, and a possible changes in water level below the Falls due to dam removal in the near or distant future that may reveal submerged land.

In order to prevent future ambiguity and unintended consequences, any transfer of property through the disposition process should clearly transfer all rights, title, and interest that the United States has to any property whatsoever, whether submerged or not.

The area where the disposition is being made as part of the USAF should be clear. It is understood that the stone dike, an important area for environmental enhancement, will be part of the USAF disposition study.

Thus the Corp should consider if it should include in this USAF disposition study all of its property downstream, including the land on the shore, to at least the end of the rock dike, if not to the gate of the Lower St Anthony Lock and Dam. Finally, the Corp is well aware of our position of the importance for public enjoyment and recreation of maintaining the water flow over the Falls, and our position that the Crown project is inconsistent with the direction given by Congress for this study.

Thank you for the opportunity to comment.

Sincerely,

Edna Brazaitis  
President  
Friends of the Lock and Dam



St. Louis

Stone Arch Bridge

University of Missouri  
Guthrie Theater

W. River Plwy

Mill City  
Museum

Guthrie Theater





October 19, 2019

U.S. Army Corps of Engineers  
180 5th St. E., Suite 700  
St. Paul, MN 55101

Attn: Nanette Bischoff, Project Manager, St. Paul District, US Army Corps of Engineers, [MplsLocksDisposition@usace.army.mil](mailto:MplsLocksDisposition@usace.army.mil)

Re: Minneapolis Locks Disposition – Upper St. Anthony Falls Lock Disposition  
Study Comment Letter

Dear Ms. Bischoff:

On behalf of Mississippi Park Connection, I am pleased to submit comments regarding disposition of the Upper Saint Anthony Falls Lock.

Mississippi Park Connection is the charitable, nonprofit partner of the Mississippi National River and Recreation Area. Our mission is to strengthen the enduring connection between people and the Mississippi River by enriching the life of the river and the lives of all who experience our national park, the Mississippi National River and Recreation Area.

Enclosed are comments about each potential outcome from the study.

### **No Action**

The corps needs to clearly define what it means by No Action. We are concerned that “no action” would lead to the steady deterioration of the site. We urge the corps to continue site maintenance for flood mitigation as well as general maintenance that does not interfere with the visitor services operation that led by the National Park Service. Further, “no action” should also define maintenance so as not to deteriorate the scenic qualities of the Central Minneapolis Riverfront / St. Anthony Falls Historic District.

## **Disposal**

We assume that if the corps decided to remove any portion of the USAF Lock prior to disposal, the corps would undertake the required Section 106 and other environmental reviews needed. Structural removal should be considered if it does not diminish flood mitigation, water supply, and also enhances scenic values, recreation, and visitor engagement with the river.

Disposal of the entire lock structure should only be considered if long term maintenance issues are addressed. Further, the structure should stay publicly owned and accessible. If the USAF Lock is transferred out of federal ownership, we expect that the Section 106 review process would lead to a Memorandum of Agreement that would provide for an equal level of review and protection as if the site remained under federal ownership.

## **Recreation**

If the corps disposed of the USAF Lock to an entity that ended visitor access, this would adversely affect the visitor experience for local, national and international visitors. A new owner could also preclude the Minneapolis Park and Recreation Board from fully implementing plans for its Water Works park development. Friends of the Lock and Dam's proposal anticipates creating a robust visitor experience at the USAF Lock that would bring in hundreds of thousands of visitors. This experience includes providing access to the channel between guide wall above the falls and the western shore. If a new entity restricted access to this channel, it could greatly limit the visitor experience for those using the amenities at Water Works or coming to a new visitor center at the lock. Thus, the corps should give priority to opportunities that continue and expand visitor access to the lock, adjacent lands and related infrastructure.

## **Scenic Quality**

New uses of the USAF Lock could adversely affect the scenic qualities of the St. Anthony Falls area and could adversely affect the St. Anthony Falls Historic District as well. The corps should consider opportunities that do not diminish the scenic or historic qualities of the area and should favor those that maintain or improve the scenic qualities.

## **Partial Disposal**

A partial disposition would enable the city and other stakeholders to implement a redevelopment plan for the Upper Lock and the St. Anthony Falls Historic District. Under the partial disposition alternative, we propose that the corps would retain

ownership of the Upper Lock structure and continue to maintain and operate the Upper Lock structure for flood control and water supply, while enabling expanded use of the lock structure for purposes consistent with the Congressional Intent Letter, City Resolution 2018R-098, the Falls Initiative, and the National Park Service use permit.

**Our opinion:**

We support the initiative of the Friends of the Lock and Dam to redevelop the site to enhance visitor enjoyment of the central Minneapolis Riverfront. The St. Anthony Falls Upper Lock could be the centerpiece of an iconic civic and cultural destination, reflective of our shared history, for the use and enjoyment of all.

Thank you for the opportunity to comment on the study. If you have any further questions you can reach me at 651-291-8161 or [knyberg@parkconnection.org](mailto:knyberg@parkconnection.org).

Sincerely,

A handwritten signature in black ink, reading "Katie Nyberg". The signature is fluid and cursive, with the first name "Katie" and last name "Nyberg" clearly distinguishable.

Katie Nyberg  
Executive Director





VIA EMAIL

Nanette Bischoff, Project Manager  
US Army Corps of Engineers  
180 5th St. East, Suite 700  
St. Paul, MN 55101-1678  
[MplsLocksDisposition@usace.army.mil](mailto:MplsLocksDisposition@usace.army.mil)

October 19, 2019

**Re: Comments of the St. Anthony Falls Alliance Regarding the Upper St. Anthony Falls Lock Disposition Study**

Dear Ms. Bischoff:

Established in 2014 to facilitate a unified approach to protecting and enhancing the amenities and aesthetics of the Minneapolis riverfront, the St. Anthony Falls Alliance (SAFA) is comprised of representatives appointed by 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. Our neighborhood associations represent more than 21,000 Minneapolis residents and small businesses.

In its work on the Upper St. Anthony Falls Lock Disposition Study, SAFA asks the US Army Corps of Engineers ("the Corps") to consider and be consistent with the Master Plan for the Central Mississippi Riverfront Regional Park ("Regional Park"). SAFA endorses the comments submitted by the City of Minneapolis and Friends of the Lock and Dam because they are consistent with implementation of the Regional Park Master Plan.

The Scope of the Study should focus on partial disposition and reflect coordination with the City and the Minneapolis Park and Recreation Board ("Park Board") to further local adopted plans for the central riverfront. The Regional Park Master Plan sets forth a Vision and five Guiding Principles for planning that should be considered by the Corps in conducting its study:

**Regional Park Vision**

The Saint Anthony Falls Regional Park will connect people to the nature, culture, and spirit of the dynamic river landscape at the birthplace of Minneapolis.

### **Guiding Principles**

*Connect to and along the river by foot, bicycle, transit, boat, and private vehicle.  
Restore and enhance natural resources, improve wildlife habitat, and water quality.  
Reveal and interpret past and present, nature and culture.  
Engage visitors through activities, amenities, food, and events.  
Adapt within the changing social, economic, and ecological realities.  
(Master Plan page 1-2)*

These principles, along with the specific goals outlined in detail by the Master Plan, offer guidance to the Corps in areas fundamental to its disposition study.

### **Maintain/Improve Human Environment**

*Engage visitors through activities, amenities, food, and events.  
Reveal and interpret past and present, nature and culture.*

In one of its ten Overall Formative Moves, the Regional Park Master Plan recognizes that the lock and dam structure is the best place for a visitor center on the Mississippi River near downtown Minneapolis:

Provide visitor services in the Mill Ruins area by collaborating with partner agencies to create a visitor's center on the St. Anthony Falls lock and dam structure.

- There is no better location to view the Falls than the Upper St. Anthony Falls Lock, and with the potential closure of the lock, the site and the current building—which is already outfitted with interpretive displays—provides a ready setting for expanded visitorship and orientation to the [Regional Park].
- This is the visitor gateway on the west bank, where culture, history, and recreation converge.

(Master Plan page 7-4)

The Master Plan also sets forth Supporting Initiatives to achieve its goals. For this part of the regional park, Supporting Initiative A states:

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.

(Master Plan page 7-16)

The Lock and Dam is not only a gateway into the Regional Park. It sits at the heart of the St. Anthony Falls National Historic District. The Regional Park Master Plan specifically identifies the Upper Lock as an interpretive site and makes the following general recommendations for the West Bank of St. Anthony Falls:

1. Make indigenous cultures more visible
2. Create a more vibrant riverfront through expanded interpretive programming

3. Preserve the area's industrial ruins while providing appropriate accessibility to the public
  4. Meet the needs of a growing number of visitors
  5. Strengthen the visual and experiential cohesiveness of the area
- (Master Plan page 6-6)

In making its recommendations for historic interpretation, the Master Plan incorporates planning work done by the Saint Anthony Falls Heritage Board: "Our Changing Relationship to the Power of the Falls: An Interpretive Vision for the East Bank of Saint Anthony Falls" (November 2013), and "Changing Relationships to the Power of the Falls: An Interpretive Vision for the West Bank of Saint Anthony Falls" (December 2014) (Master Plan pages 6-4 and 6-6). The Master Plan also calls for consideration of the Saint Anthony Falls Historic District Guidelines (Master Plan pages 1-6, 5-12 and 5-13).

In its study, the Corps should consider the Lock and Dam structure's potential for a visitor's center as well as the historic significance of the Upper Lock and the expanded role it could play in the interpretation of historic, cultural and archaeological resources of this special area.

#### Maintain/Improve Natural Environment

*Restore and enhance natural resources, improve wildlife habitat, and water quality.*

SAFA believes that the continued success and growth of this important recreation area relies on the beauty and vitality of St. Anthony Falls. Protecting the aesthetic flow over the dam year-round, day and night, is of paramount importance and should be considered by the Corps in its study.

The Corps study should take note that the Master Plan describes "abundant opportunities to restore existing habitat, increase restoration areas, and connect habitat patches to contribute to a healthier ecological corridor along the Mississippi River." (Master Plan page 5-14). The Master Plan recommendations for natural resources "focus on restoration, expansion of native vegetation, reduction of impervious surfaces, and incorporation of green infrastructure." (Master Plan page 5-14).

#### Maintain/Improve Recreational Opportunities

*Connect to and along the river by foot, bicycle, transit, boat, and private vehicle.*

The Master Plan outlines specific goals for improving connections in Upper Mill Ruins Park in and around the Upper Lock:

- 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.  
(Master Plan page 7-16)

Preserving access to existing as well as future trails surrounding the Upper Lock is a critical concern for this disposition study. Master Plan maps of proposed pedestrian circulation include access to the lock and dam structure from Water Works Park via the walkway on the upper river side (Master Plan pages 7-17 and 7-19). In addition, SAFA recommends the Corps consider the future potential of the access road running between the lock and dam structure and the I-35W bridge. This road offers a connection to West River Parkway, as well as stunning views of the natural and built environment.

The Corps should work with the National Park Service as well as the Park Board to ensure the proposed disposition will support and enhance goals for improvements intended to make the lock and dam site a vibrant hub connecting people to the Mississippi River.

#### Redevelopment Proposals

*Adapt within the changing social, economic, and ecological realities.*

SAFA believes the *The Falls* proposal made by Friends of the Lock and Dam strongly enhances the gateway role of the structure for visitors to the Regional Park and St. Anthony Falls Historic District and directly supports Master Plan goals for this site as outlined above.

In contrast, SAFA agrees with numerous Upper Lock stakeholders and the City resolution that development of a hydroelectric power plant on the Upper Lock is contrary to the public interest. SAFA has long advocated that the proposed Crown Hydro facility would interrupt current park use, preclude future development, and adversely impact the economic and social fabric of the surrounding area.

Potential negative impacts of Crown Hydro include:

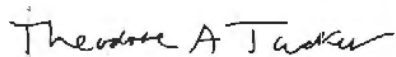
- Appropriation of water threatening aesthetic flow
- Creation of hazards for small craft recreation with impractical portage route and turbulence
- Preclusion of access to the lock and dam structure from Water Works via the walkway on the upper river side as described above
- Threat to a key initiative 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
- Restriction of visitor access to park facilities caused by security infrastructure (fencing, restricted entry) that would be required by any potential hydro power or other energy operation.

## CONCLUSION

In its work on the Upper St. Anthony Falls Lock Disposition Study, SAFA urges the Corps to consider and be consistent with the Regional Park Master Plan Vision: “The Saint Anthony Falls Regional Park will connect people to the nature, culture, and spirit of the dynamic river landscape at the birthplace of Minneapolis.”

Thank you for the opportunity to submit these comments.

Sincerely,

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

Theodore A. Tucker,  
Chair, Central Mississippi Riverfront Regional Park Master Plan Community Advisory  
Committee

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

### Attachments:

Excerpts from the Minneapolis Park and Recreation Board Central Mississippi Riverfront  
Regional Park Master Plan (2016)

*"A river touching the back of a town is like a wing, it may be unused as yet, but ready to waft it over the world. With its rapid current it is a slightly fluttering wing. River towns are winged towns."*  
- Henry David Thoreau

## Introduction and Intent

Central Mississippi Riverfront Regional Park (CMRRP) is located in the heart of Minneapolis, encompassing approximately 350 acres of riverfront along the Mississippi River, and running through the historic Mill District and the Downtown Minneapolis core. This urban park is within the much larger, 72-mile-long Mississippi National River and Recreation Area. CMRRP is unique in that it encompasses open space, historic and cultural resources, and riparian ecosystems within a vibrant urban area bordering a nationally-significant river. The vision proposed for the CMRRP describes a place that will "connect people to the nature, culture, and spirit of the dynamic river landscape at the birthplace of Minneapolis." This vision imagines a regional park that will connect people to the Mississippi River, restore and enhance natural resources, reveal and interpret past and present nature and culture, engage visitors and adapt to changing social, economic and ecological realities.

The purpose of the CMRRP Master Plan is to provide guidance on the redevelopment and enhancement of existing facilities and resources, as well as the acquisition of additional property and expansion of the regional park boundary.

## Planning Framework

In the 1970s, visionary MPRB and City leaders began work that ultimately transformed the riverfront's industrial landscape into the public asset enjoyed today. In 2013, the Metropolitan Council estimated over 2 million visits to the CMRRP.

The CMRRP Master Plan builds on previous planning efforts. The 1982 Central Riverfront Regional Park Plan, adopted by the Metropolitan Council and incorporated into the Minneapolis Comprehensive Plan, has guided acquisition and development in the park for three decades.

The MPRB sees the changes that are happening along the River and the edges of the regional park since the last Master Plan. To stay on top of current trends and to seek better riverfront experiences, the MPRB and its appointed Community Advisory Committee and Technical Advisory Committee have developed a new Vision for the Park.

## Regional Park Vision

Through the community engagement process, it became evident that a name change is needed for the park. St. Anthony Falls Regional Park is the proposed name, and is reflected in the vision below, a vision agreed upon by the Community Advisory Committee.

*"The Saint Anthony Falls Regional Park will connect people to the nature, culture, and spirit of the dynamic river landscape at the birthplace of Minneapolis."*

## Guiding Principles

Supporting the vision statement are the five guiding principles:

- » **Connect to and along the river by foot, bicycle, transit, boat, and private vehicle.**
- » **Restore and enhance natural resources, improve wildlife habitat, and water quality.**
- » **Reveal and interpret past and present, nature and culture.**
- » **Engage visitors through activities, amenities, food, and events.**
- » **Adapt within the changing social, economic, and ecological realities.**

This Vision and its Principles guide the planning efforts within this Master Plan in concert with the goals of the Minneapolis Park and Recreation Board and The Metropolitan Council Regional Park and Open Space Committee.



**“Changing Relationships to the Power of the Falls:  
An Interpretive Vision for the East Bank of Saint  
Anthony Falls” (St. Anthony Falls Heritage Board and  
Cinncinatus/HKGI, Completed 2013)**

Similar to the interpretive plan for the West Bank, the planning effort for the East Bank ran in parallel to the CMRRP effort. This plan can be found in the appendix. Key points of this plan are summarized in Chapter 6.

**Water Works Schematic Design Project (SCAPE Design  
Team, Minneapolis Parks Foundation and MPRB, 2014)**

The upper portion of Mill Ruins Park is the site of the Water Works Project, a RiverFirst Initiative priority project led by the Minneapolis Parks Foundation in collaboration with the MPRB. The schematic design is complete, building off the 2012 Water Works Concept Study, and will have been approved alongside this Master Plan. Design work has occurred concurrently and in collaboration with the CMRRP master planning effort. Design initiatives include a new visitor center, removal and interpretation of the Fuji-ya building, historic interpretation of the Mill Ruins, improved ecological shoreline function, enhanced pedestrian and bike connections, and a modified parkway alignment.

**West River/James I Rice Parkways Trail Improvements,  
(MPRB, Construction Completed 2014)**

This trail improvement project addresses the bike and pedestrian trails from Franklin Avenue to Plymouth Avenue North. Construction began in the fall of 2014. The project includes new paving, lighting, signs and rest stops with benches and drinking water.<sup>8</sup> This effort intersects with the CMRRP between the I-35W Bridge and Plymouth Ave North on the west side of the river; future park projects should take this project into consideration.

**Water Works Concept Study (MS&R, HR&A, Completed  
2012)**

This planning study focuses on the area around the Mill Ruins and the terminus of the Stone Arch Bridge in Minneapolis, designated the Water Works Study Area. It proposes a concept plan with the goals of engaging the ruins, interacting with water, being family-friendly, creating seasonal attraction, being prideful of design, and having layered zones of use. These recommendations directly apply to the CMRRP and should be taken into consideration in future development.<sup>14</sup>

**St. Anthony Falls Historic District Design Guidelines  
(Adopted by the Heritage Preservation Commission,  
Completed 2012)**

This document proposes design guidelines for the St. Anthony Falls Historic District, which covers a large portion of the CMRRP. The guidelines establish standards for development, with the intent of protecting the integrity, character, and sense of place of the district. The guidelines cover alterations to historic buildings, new structures, improvements to landscapes, and public spaces. They also promote good stewardship of existing historic and archeological structures, emphasizing preservation and interpretation. While they promote historic preservation, they also encourage principles of urban design and streetscape vitality. Future development within the historic district will need to take these guidelines into account.<sup>15</sup>

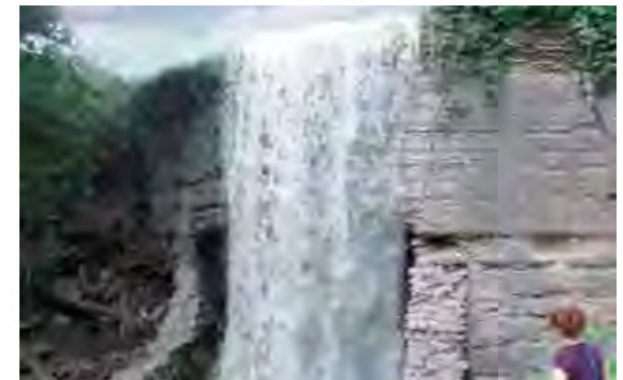
**St. Anthony Falls East Bank Waterfall Feasibility Study  
(Barr Engineering for MPRB, Completed 2011)**

This report studies the feasibility of reestablishing the east falls on the Mississippi River, located at Hennepin Island. As part of the study, a preliminary hydrological analysis, a geotechnical review, and meetings with an

advisory group and the general public were conducted. Several alternatives and locations are studied in the report, and two alternatives are presented for further study. The report also covers general site context and history, design and engineering criteria, project constraints, permitting and regulations, and conceptual design. Implementation cost at a concept level is proposed for each alternative.<sup>16</sup>



*25 Year Vision Concept for the East Bank from An Interpretive Vision for the East Bank of Saint Anthony Falls*



*East Falls Concept Image from St. Anthony Falls East Bank Waterfall Feasibility Study*



Left to right - Open lawn area with overstory tree canopy, Floodplain forest floor at Hennepin Island, Prairie at Mill Ruins Park

## Grasslands

Grasslands found in the CMRRP fall into two categories: tall non-native grasses and native grasses, such as mesic prairie. All of the native grasslands are listed in poor condition.

Native mesic prairies are located at Lower Mill Ruins Park, North Nicollet Island, and Boom Island. All of the prairies have been planted along with one of the native grassland patches on north Nicollet Island is considered altered and has been a site of recent tree plantings with the goal of reforestation.

## Forests

Woodlands in the CMRRP are typically found along the shoreline and on steep slopes and bluffs. The woodlands are altered deciduous, riparian areas that contain non-native species. There are no defined native woodlands in the area.

## Built/impervious cover

Approximately 25% of the CMRRP is considered more than 50% impervious. As discussed previously, impervious surfaces can increase surface runoff, leading to increased erosion, and water quality impacts.

## Invasives Species - Vegetation

Non-native, invasive shrubs such as European buckthorn, glossy buckthorn and tartarian honeysuckle are prevalent in the forested areas. Common herbaceous invasives include reed canary grass, smooth brome and garlic mustard. MPRB staff will continue on-going efforts to manage invasives.

Native vegetation establishment should continue to be a priority on all open water shorelines to minimize the potential for erosion and prevent contaminated runoff from draining directly in to the river. Efforts should be made towards working with property owners and

partnering agencies within the park to establish native shoreline buffers.

## Sites of Biodiversity

Currently, no sites of significant biodiversity are located within the CMRRP. Essentially this means that there is no group of native plants within the park that has not been altered significantly by human use or introduced plant species.

## Existing Land Use/Design Guidelines

There are additional guidelines that need to be considered and addressed when considering new design, development, or landscape aesthetics. Not only does CMRRP fall within the Mississippi River Corridor Critical Area (MRCCA) but it is also within the Saint Anthony Falls Historic District. The majority of the Park's underlying zoning is governed by the City of Minneapolis with small portions controlled by the Federal government.





Left to right - Bald Eagle, River Otter, Fresh water mussel

For any new plantings or streetscape treatment within the park, the Saint Anthony Falls Historic District Design Guidelines will need to be considered so the overall character of the historic district is preserved.

The MRCCA helps guide general development, storm-water standards, vegetation management, and land alteration standards. Currently, the CMRRP falls into the Urban Diversified District of the MRCCA, but this is being revised by the Minnesota Department of Natural Resources.

## Wildlife

Nearly half of North America's bird species and about 40 percent of its waterfowl depend on the Mississippi River flyway. The Mississippi River is home to 25 percent of all fish species in North America, 50 mammal species, and at least 145 species of amphibians and reptiles.<sup>53</sup>

Key species, such as eagles and mussels, are seen as indicators of river health. As efforts have been made to improve the overall improve water quality and ecological health of the river, these species have been making a comeback. The portion of the river within the CMRRP is considered good habitat for mussels and has resulted in more mussel species and larger populations.<sup>54</sup> In the Twin Cities area and within the MRCCA, NPS data indicates that there are approximately 48 active eagle nesting sites, indicating a strong and stable bald eagle population.<sup>55</sup> Directly within CMRRP, a pair of bald eagles began nesting on the east side of the River near the Lower St. Anthony Lock and Dam in early 2014. Also, river otters have frequently been observed on the banks and in the waters of the Mississippi within the CMRRP.

To keep these animal populations healthy, the NPS routinely conducts studies to assess the quality of wildlife habitat and the impact of humans on their increasingly fragmented living space. Concern about loss of wildlife habitat and corridors within the park has resulted in a

number of partner organizations working with the park to restore, expand, and connect the remaining natural areas.<sup>56</sup>

## Species of Special Concern

According to Natural Heritage Information System (NHIS) data, a colony of Tricolored Bats (*Perimyotis subflavus*) has been observed hibernating in the area. Tricolored bats are vulnerable to extinction in Minnesota due to their small population in the state, its susceptibility to disturbance during hibernation, and potential for persecution. Listed as a special concern species, protection of bat hibernation sites from human disturbance is a top priority for DNR management.<sup>57</sup>

The Black Sandshell mussel (*Ligumia recta*) has also been observed in the CMRRP. Given its recent decline in numbers and loss of quality habitat, this species was listed as a special concern species in Minnesota in 1996. The Black Sandshell's habitat is threatened by non-



point source water pollution and sediment pollution as well as infestation of the non-native zebra mussel.<sup>58</sup>

### **Invasive Species- Wildlife**

Invasive species, such as Asian carp and zebra mussels, are a concern as they threaten the river ecosystem. Both of these species are reproducing at an alarming rate and don't appear to have natural predators. The MPRB will continue to coordinate with partnering agencies to protect river habitat.

The closure of the Upper St. Anthony Lock and Dam, included in recent legislation, will create a barrier to the migration of Asian carp upstream and hopefully protect the upper Mississippi and lakes.

## **Natural Resource Recommendations**

The Mississippi River and its vibrant grasslands, forests, and wetlands have been compromised by human development and manipulated to the detriment of natural systems and the birds and other wildlife that depend on them.<sup>59</sup> This pattern of degraded and fragmented habitat can be seen in the CMRRP with its highly urban context. Because of this, there are abundant opportunities to restore existing habitat, increase restoration areas, and connect habitat patches to contribute to a healthier ecological corridor along the Mississippi River.

Considering that there is no existing non-altered native vegetation in the park, the natural resource recommendations focus on restoration, expansion of native vegetation, reduction of impervious surfaces, and incorporation of green infrastructure.

Recommendations fall under five general categories and respond to the existing land cover types found in the park: (See **Figure 25**).

- » Turf grass with overstory canopy
- » Urban gardens
- » Prairie restoration
- » Woodland/shoreline restoration
- » Green Infrastructure

### **Turf with Overstory Canopy**

Existing land cover areas that are maintained turf grass with overstory canopy trees should have the deciduous tree population managed. Ash trees in particular, are threatened by the spread of emerald ash borer, and should be removed over time.

### **Urban Gardens**

Hardscaped areas, such as plazas or entryways, should be softened by eliminating excess paving and integrating native plantings to reduce stormwater runoff. Green infrastructure, such as pervious pavers, could also be utilized if an area is reconstructed to further protect the river's water quality.

### **Grassland Restoration and Expansion**

Native mesic prairies that have been planted and established at Lower Mill Ruins Park and Boom Island should be maintained for invasive species removal. The patches of prairie on North Nicollet Island were historically wooded and the community has a desire to see them reforested. These patches of prairie are recommended to be maintained for invasive species and be

transitioned over time to native woodlands, such as a Maple-Basswood forest. Expansion of native mesic prairie is recommended for B.F. Nelson, Upper Mill Ruins, and the Main Street Portage area.

### **Woodland/Shoreline Restoration and Expansion**

Since the shoreline and forested steep slopes correspond in the CMRRP, shoreline and woodland restoration have been combined for mapping purposes. Invasive species should be removed and erosion control implemented to preserve the bluff/river edges. As invasive species are removed, additional native plants should be reintroduced. Riparian floodplain species, such as a cottonwood forest type, would be appropriate in this corridor. Overstory, understory, shrub, and forest floor species all should be considered in these zones to promote a healthy forest ecosystem and contribute to habitat for migratory birds and other river wildlife.



Left to right - 1869 Eastman tunnel collapse, 1986 Gatehouse excavation, Upper Lock and Dam

for the East Bank of Saint Anthony Falls" (draft, October 3, 2013), and "Changing Relationships to the Power of the Falls: An Interpretive Vision for the West Bank of Saint Anthony Falls" (draft, July 2014).<sup>1</sup> Both plans aim to provide visitors with experiences that:

- » Provide physical access with trails and structures
- » Connect the people and events through narrative
- » Extend exploration through online resources and location-based media<sup>2</sup>

The plan for the East Bank presents the following major recommendations:

1. Establish a visitor orientation center
2. Build clear and connected trails
3. Integrate interpretive experiences between sites and subjects

4. Develop Main Street as an experience connector
5. Restore and highlight the East Falls
6. Employ a wide array of interpretive modes and tools
7. Get people underground

Specific sites and subjects that should be highlighted are the East Falls, Chalybeate Springs, river ecosystems, hydroelectric sites, the Pillsbury A Mill complex, and tunnels and caves.<sup>3</sup>

On the opposite side of the river, the West Bank plan makes the following major recommendations:

1. Make indigenous cultures more visible
2. Create a more vibrant riverfront through expanded interpretive programming
3. Preserve the area's industrial ruins while providing appropriate accessibility to the public
4. Meet the needs of a growing number of visitors

5. Strengthen the visual and experiential cohesiveness of the area

The interpretive sites and subjects identified for this bank are Saint Anthony Falls and Spirit Island, the canal and gatehouse, railroads and rail corridors, the Upper Lock and Lower Lock and Dam, the mill ruins and tunnels, bridges, standing mills and related structures, and the Gateway District.

The CMRRP plan has directly incorporated these recommendations at a larger scale. (See **Figure 26**). The Interpretive Vision plans for the West Bank and East Bank are included in the appendix.

<sup>1</sup> Both plans were prepared by consultant Cincinnatus. They will hereafter be cited as "Interpretive Vision: East Bank" and "Interpretive Vision: West Bank," respectively.

<sup>2</sup> "Interpretive Vision: East Bank," 5, and "Interpretive Vision: West Bank," 2.

<sup>3</sup> "Interpretive Vision: East Bank," 6.

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## Overall Formative Moves and Rationale, cont.

### » Provide visitor services in the Mill Ruins area by collaborating with partner agencies to create a visitor's center on the St. Anthony Falls lock and dam structure.

- There is no better location to view the Falls than the Upper St. Anthony Falls Lock, and with the potential closure of the lock, the site and the current building—which is already outfitted with interpretive displays—provides a ready setting for expanded visitorship and orientation to the CMRRP.
- This is the visitor gateway on the west bank, where culture, history, and recreation converge.
- Construct vertical link with visitor services at 1st St S near the 3rd Ave Bridge.

### » Expand the Regional Park Boundary to Bridge No. 9.

- Allows all recommended trails to be within the regional park boundary.
- Creates seamless connection between CMRRP and **Mississippi** Gorge Regional Park.
- **Incorporates West River Parkway and lands between it and the existing Regional Park Boundary, creating a cohesive, uninterrupted park and trail space.**

### » Promote open public use of the Nicollet Island Pavilion and Park.

- Short-term: Current building is under lease through 2026. During this time the pavilion may be adapted to better serve public access needs to the south tip of the island during private events.
- Long-term: Consider establishing a partnership with a new enterprise to provide public programming for seasonal or year-round use.

### » Complete a continuous bicycle and pedestrian trail system on both sides of the river.

- A continuous trail system would help provide connections, wayfinding, and, in general, orientation to the regional park for visitors.
- Key sections of trail are missing and should be finished to offer a continuous pedestrian- and bicycle-focused trail experience along the entirety of the Saint Anthony Falls riverfront.

### » Re-establish historic East Falls.

- This initiative is consistent with the East Bank Interpretive Plan and Saint Anthony Falls Historic District Design Guidelines.
- Re-establish the falls so that a natural gravity flow is evident.
- There is an opportunity to reveal and interpret history and draw more people to the Phillip Pillsbury Park, Father Hennepin Bluffs, and the Hennepin Island area.

### » Incorporate green infrastructure into new design initiatives.

- Improve water quality in the river and protect wildlife habitat.
- Partnering opportunities and a variety of funding sources are available.
- Expand opportunities for pairing design with green infrastructure function to enhance the experience of the regional park.
- Reduce maintenance costs over the long-term.



### 3. Mill Ruins Park

Mills 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

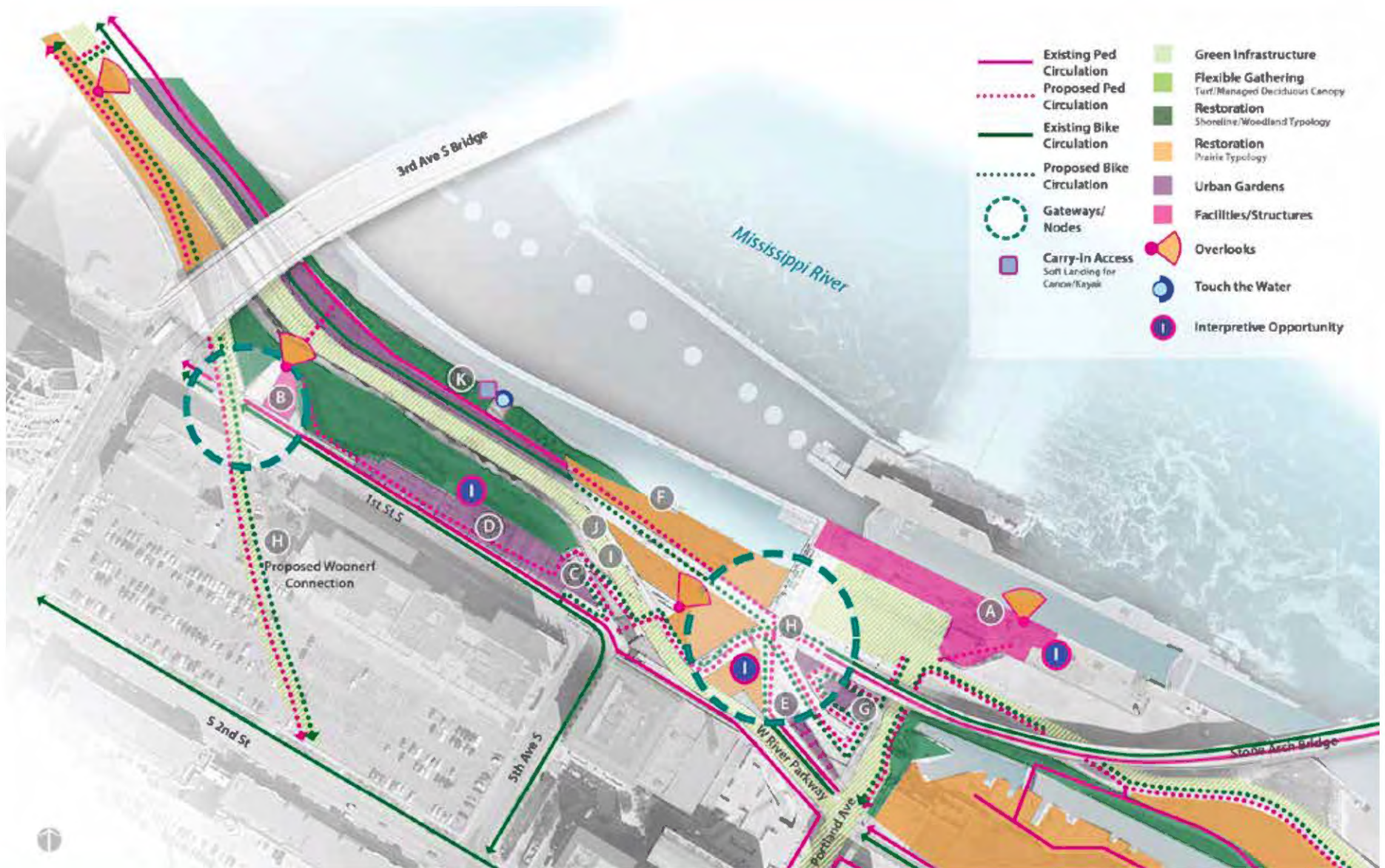


Figure 33: Upper Mill Ruins Recommendations



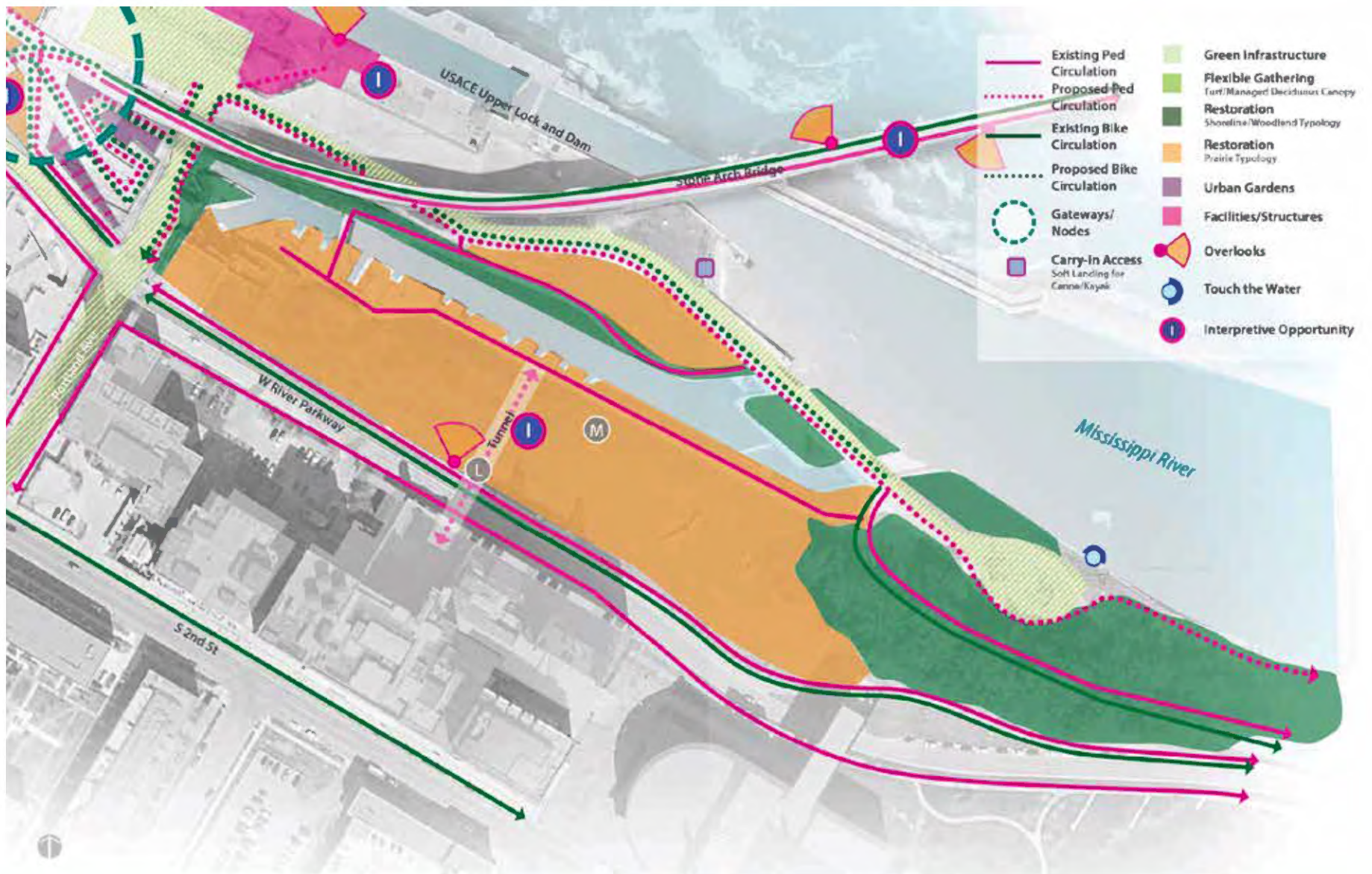
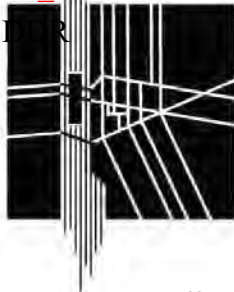


Figure 34: Lower Mill Ruins Park Recommendations





Nicollet Island – East Bank Neighborhood Association  
 500 8th Ave SE  
 Minneapolis, MN 55414  
[www.niebna.org](http://www.niebna.org)

October 17, 2019

Nanette Bischoff, Project Manager  
 US Army Corps of Engineers  
 180 5th St. East, Suite 700  
 St. Paul, MN 55101-1678

**Re: Comments of the St. Anthony Falls Alliance Regarding the Upper St. Anthony Falls Lock Disposition Study**

NIEBNA is the official neighborhood association representing residents of both Nicollet Island and the East Bank neighborhoods, a triangle formed by the Mississippi River, Central Avenue, and the Burlington Northern Santa Fe Railroad line. Our neighborhood is just upstream of St. Anthony Falls.

NIEBNA endorses the comments made by the St. Anthony Falls Alliance and the City of Minneapolis. NIEBNA also asks the Corps to consider the goals of our own Small Area Plan, which includes the following as one of its Top Priorities: “improve connections to the riverfront parkland and to bicycle and pedestrian trails.” (Small Area Plan, page ES-4)

Much of our neighborhood lies within the Central Mississippi Riverfront Regional Park, and we are connected to the Upper Lock by the trails and transitways linking parkland on both sides of the River. The Minneapolis 2040 Comprehensive Plan recognizes the importance of the upper lock area in connecting residents to the River:

“St. Anthony Falls is now the core of the City’s central riverfront redevelopment efforts to enable people to live nearby and to enjoy the vitality of the urban setting and its natural resources. St. Anthony Falls is the center of a 150-acre regional park and is a contributing resource in the state-designated St. Anthony Falls Heritage District. It lies between a national engineering landmark (James J. Hill’s Stone Arch Bridge) and the site of the first public bridge across the Mississippi River. St. Anthony Falls was a major tourist attraction in the 1850s, and both state and local governments have invested heavily in making the area a major attraction again. It is also adjacent to the last lock constructed on the Mississippi at the former head of navigation for the river. St. Anthony Falls has cultural, historic, economic, scenic, and recreational significance to the nation, the state, the region, and the City, and should be treated with the utmost respect.”  
**(Minneapolis 2040 Plan, Appendix A – Mississippi Corridor Critical Area Plan, page A-7)**

Maintaining and strengthening the connections between the riverfront and adjacent neighborhoods should be considered in the disposition study currently underway. Thank you for the opportunity to submit these comments.

Sincerely,

Chris Lautenschlager  
 NIEBNA Executive Director



October 18, 2019

VIA EMAIL

U.S. Army Corps of Engineers  
180 5th St. E., Suite 700  
St. Paul, MN 55101

Attn: Nanette Bischoff, Project Manager, St. Paul District, US Army Corps of Engineers,  
[MplsLocksDisposition@usace.army.mil](mailto:MplsLocksDisposition@usace.army.mil)

Re: Minneapolis Locks Disposition – Upper St. Anthony Falls Lock Disposition Study  
Comment Letter

Dear Ms. Bischoff:

Friends of the Lock and Dam (“FL&D”) is submitting this comment and expression of interest letter in response to the St. Paul District’s solicitation of public comment on the Minneapolis Locks Disposition Study, Upper St. Anthony Falls Lock and Dam, regarding (1) the scope of the study and affected areas as presented during the public meetings; (2) suggestions on how the human environment at Upper St. Anthony Falls could be maintained/improved; (3) suggestions on how the natural environment at Upper St. Anthony Falls could be maintained/improved; and (4) suggestions on how recreational opportunities at Upper St. Anthony Falls could be maintained/improved. We are re-submitting the expression of interest we submitted during the first study, on August 20, 2018, in order to place it in the public record for the present study.

***FL&D and the City are interested in redeveloping the Upper Lock.***

FL&D is a 501c3 public nonprofit organization with a mission to re-purpose the Upper Lock into a world class destination visitor and interpretive center, consistent with the Central Riverfront Regional Park Master Plan<sup>1</sup> and fully integrated with the Water Works/RiverFirst Initiative.<sup>2</sup>

The City of Minneapolis (the “City”) has been actively involved with and supportive of our vision for the Upper Lock. For over a decade, the City has been an important stakeholder in redevelopment and revitalization within the St. Anthony Falls Historic District, the district in which the Upper Lock is located. The U.S. Army Corps of Engineers (the “Corps”) has recognized the

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<sup>1</sup> Central Mississippi Riverfront, Regional Park Master Plan, Minneapolis Park and Recreation Board, [https://www.minneapolis-parks.org/asset/d6kv9t/central\\_riverfront\\_masterplan\\_approved.pdf](https://www.minneapolis-parks.org/asset/d6kv9t/central_riverfront_masterplan_approved.pdf).

<sup>2</sup> RiverFirst, Minneapolis Parks Foundation, <https://mplsparksfoundation.org/riverfirst/>.

City's interest in the future of the Upper Lock resulting from the City's prior involvement in the Upper Lock, including its role as the original development and cost-sharing partner.<sup>3</sup>

***The Falls Initiative represents the vision of the City, FL&D, community, and other stakeholders for the Upper Lock and Riverfront.***

In furtherance of our mission and the joint vision of all stakeholders in the future of the Riverfront and St. Anthony Falls Historic District, we have developed a plan for reconstruction of the Upper Lock and surrounding real property – referred to as “the Falls Initiative.”

The Falls Initiative contemplates development of a visitor center, interpretive, exhibition and event spaces, and other amenities intended to enhance and preserve the historical, cultural, and recreational value of the St. Anthony Falls.<sup>4</sup> The Falls Initiative envisions repurposing the Upper Lock as a destination for recreational, touristic, and interpretive purposes. The Falls Initiative will draw visitors to discover the Mississippi National River & Recreation Area, a National Park, at one of its most iconic features - St. Anthony Falls - the only major waterfall on the Mississippi River. The Falls Initiative project will implement the vision of multiple adopted plans and would become a destination feature of the ten-state Great River Road, a National Scenic Byway.

The Falls Initiative embraces a vision of our riverfront that has been shaped over the course of more than a decade of planning and investment by public, private, and nonprofit parties. The Falls Initiative is consistent with numerous major federal, state, and regional plans and other City of Minneapolis small area plans (especially those for the Historic Mill District, the North Loop/Downtown East, and plans for the redevelopment of the Upper Harbor) that have already achieved a meaningful change in consciousness about the Minneapolis Riverfront as an asset and a destination.<sup>5</sup>

FL&D has engaged with more than two dozen stakeholder organizations that have come together as a coalition for the future of the Upper Lock, including the Corps, the City, Minneapolis Park & Recreation Board, Minnesota Historical Society, Mississippi Watershed Management Organization, and National Park Service.<sup>6</sup> Eighteen organizations have taken formal action at the leadership level to endorse a coalition statement which reads, “We support the St. Anthony Falls Upper Lock as the centerpiece of an iconic civic and cultural destination, reflective of our shared history, and our stewardship of clean water, for the use and enjoyment of all.” The Falls Initiative reflects the vision and values of that coalition and their respective constituents, representing our community.

By adopting Resolution 2018R-098 on April 13, 2018,<sup>7</sup> the City affirmed its commitment to the development and implementation of the Falls Initiative and directed its staff to work with

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<sup>3</sup> Initial Appraisal, Upper St. Anthony Falls Lock and Dam, Lower St. Anthony Falls Lock and Dam, and Lock and Dam No. 1, Minneapolis, Minnesota (Section 216), U.S. Army Corps of Engineers, St. Paul District, at 9 (Oct. 5, 2015).

<sup>4</sup> See [Exhibit A](#) – The Falls: A Visitor & Interpretive Center for the Upper Lock; see also The Falls Initiative, <http://thefalls.org/about/the-falls-initiative/>.

<sup>5</sup> See [Exhibit B](#) for a list of major plans.

<sup>6</sup> List of endorsers: <http://thefalls.org/coalition/coalition-voices/>.

<sup>7</sup> See [Exhibit C](#).



representatives of FL&D, the Corps and other interested parties to examine options to implement the Falls Initiative.

In 2018, Congress passed the Americas Water Infrastructure Act, and Section 1225 of that Act directs the Corps, in part, to expedite both the disposition study for the Upper Lock and execution of any disposition resulting from the study, to produce a report for the Upper Lock that is separate from any report on any other lock or dam, and that such report “*includes plans for*” (emphasis added) a partial disposition of the Upper Lock and surrounding real property that preserves any portion of the Upper Falls necessary to maintain flood control. The Act also provided direction that the report “*includes plans for*” (emphasis added) preserving and enhancing the recreational opportunities and the health of the ecosystem, as well as maintaining benefits to the natural ecosystem and human environment. By letter dated January 8, 2019, Senators Klobuchar and Smith clarified Congressional intent with respect to Section 1225 (the “Congressional Intent Letter”), stating, in relevant part:

“In addition, it was our intent that while undertaking the disposition study for the Upper Lock, the Corps would cooperate with the City *to develop a plan* (emphasis added) in which the Corps would continue to own, operate, and maintain the Upper Lock facility for flood control and water supply management and divest to the City a portion of the real property surrounding the Upper Lock in a manner that will facilitate public financing of the divested property. This joint plan between the City and the Corps will continue the City’s revitalization of the central riverfront and facilitate additional residential, commercial, and recreational growth.”

We believe that the directive language of developing a plan, versus merely studying the alternatives, evidences Congressional intent that the Corps focus the study, on an expedited basis, on a partial disposition, and that as stated in the Congressional Intent Letter, such partial disposition should reflect coordination (a “joint plan”) with the City to further local adopted plans for the central riverfront.

FL&D supports this new direction from Congress, and encourages a *partial* disposition of the Upper Lock, rather than *no action* or *disposition*. A partial disposition would enable the City and other stakeholders to implement the long-standing community vision for the Upper Lock and the St. Anthony Falls Historic District. Under the partial disposition alternative, we propose that the Corps would retain ownership of the Upper Lock structure and continue to maintain and operate the Upper Lock structure for flood control and water supply, while enabling expanded use of the Lock structure for purposes consistent with the Congressional Intent Letter, City Resolution 2018R-098, the Falls Initiative, and the National Park Service use permit. The City or its designee would acquire from the Corps certain real property surrounding the Upper Lock (the “Acquired Property”)<sup>8</sup> to further implement the Falls Initiative. During the partial disposition process, FL&D intends to work cooperatively with the Corps in connection with the Corp’s ongoing flood mitigation operations at the Upper Lock including, for example, the need for crane access and operations. Through such acquisition, and further cooperative development and use agreements,

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<sup>8</sup> FL&D proposes that parcels of Acquired Property would be identified by the Corps, the City and FL&D as priority areas for cultural interpretation, enhancement, recreational value, historic resource quality, park connectivity gaps, scenic qualities, water quality, and water access. FL&D will conduct due diligence activities including appraisals, environmental reviews, title investigations, and survey work.

the Corps and the City together with the support of other stakeholders, including FL&D, would implement the Falls Initiative to preserve and enhance the environmental resources and historic, cultural, and recreational value of the St. Anthony Falls Historic District.<sup>9</sup> FL&D would develop, operate and maintain the Falls Initiative and be responsible for the operation, maintenance, repair, restoration and rehabilitation expenses associated with the property acquired by the City or controlled by agreements during and after implementation of the Falls Initiative.

Congressional direction to expedite the study and the resulting partial disposition is increasingly critical to the efforts of FL&D and our coalition seeking to revitalize the central riverfront. FL&D, in coordination with the City, is proposing to pay a fair price for the Acquired Property, based on an assessed value. The purchase price will be partially funded through FL&D's philanthropic fundraising efforts. Further, FL&D applied for, and has been included as a project recommendation for, a grant in the amount \$2,800,000 from the Legislative-Citizen Commission on Minnesota Resources ("LCCMR"). The LCCMR grant is subject to final approval by the Legislature and Governor of the State of Minnesota. If the LCCMR grant is approved, the funds will be available in July of 2020. Due to the momentum of the FL&D's fundraising activities, including the LCCMR grant, and the proposed development of the Falls Initiative by the City and FL&D in coordination with other ongoing riverfront projects, we encourage the Corps to conduct the disposition study as expeditiously as possible.

A partial disposition of the Acquired Property and further development of that property will result in ongoing coordination between the Corps, the City and FL&D. To help facilitate the development and various capital improvements on the Acquired Property and Upper Lock, we request that the scope of the study include gathering information and reporting on the following specific elements: the condition of critical physical features of any improvements at the Upper Lock and surrounding property, including the roof, elevator, whether any asbestos or other hazardous materials are present, and any other physical features that may pose public safety concerns; the rights and obligations of the Corps and Xcel Energy with respect to the lock and dam; water intakes; operational costs, maintenance costs, and recent and deferred capital expenditures; facilities, needs and operations of public safety entities, including relevant police, fire and rescue organizations; and access requirements for cranes, trucks and other heavy equipment necessary for future maintenance of the Upper Lock.

***Development of a hydroelectric power plant is  
counter to the public interest***

The Corps should make recommendations that are in the public interest. FL&D believes that development of a hydroelectric power plant on the Upper Lock would be counter to the public interest. This belief is consistent with the stated opposition to the currently proposed hydroelectric plant of numerous stakeholders, including the City<sup>10</sup> and Minnesota State Senators Kari Dziedzic and Bobby Joe Champion<sup>11</sup> and numerous non-profit organizations and other key stakeholders.

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<sup>9</sup> See

[http://www.mvp.usace.army.mil/Portals/57/docs/Civil%20Works/Projects/MplsLocksDisposition/MplsLocksDisposition\\_LockFacilities\\_3jul.pdf?ver=2018-07-17-144916-863](http://www.mvp.usace.army.mil/Portals/57/docs/Civil%20Works/Projects/MplsLocksDisposition/MplsLocksDisposition_LockFacilities_3jul.pdf?ver=2018-07-17-144916-863).

<sup>10</sup> City Council Resolution 2018R-098: "Be It Further Resolved that to revitalize and preserve the value of the Upper St. Anthony Falls Lock – an invaluable part of MNRRA - the City Council hereby states its opposition to the development of any hydroelectric generating facilities on the Upper St. Anthony Falls Lock.

<sup>11</sup> August 21, 2019 letter from Senators Dziedzic and Champion to the Commissioners of the Federal Energy

Further, at a hearing on August 16, 2018, Minnesota Public Utilities Commissioner Lipschultz referred to the candidate hydro project seeking a license for the Upper Lock as “contrary to the public interest in a really profound way.”

Development of a hydroelectric power plant on the Upper Lock is incompatible with the Falls Initiative and is contrary to direction in the Congressional Intent Letter to “continue the City’s revitalization of the central riverfront”. Further, development of a hydroelectric power plant would be detrimental to the human and natural environment and recreational opportunities at the Upper Lock by making the area more “industrialized” and by decreasing access to the river, and by negatively impacting access to, and use of, the water by recreational paddlers.

***Suggestions on how the human environment, natural environment and recreational opportunities at the Upper Falls could be maintained/improved.***

As described above, the Falls Initiative was developed in coordination with numerous stakeholders and contemplates development of a visitor center, interpretive, exhibition and event spaces, and other amenities intended to enhance and preserve the historical, cultural, and recreational value of the St. Anthony Falls.

**Human Environment**

The Falls Initiative will help improve the human environment by creating additional economic development in the region and by providing a unique, world class destination to activate, connect, interpret, and promote the relationship between river and city in meaningful ways for millions of people.

The economic development and increasing density of the population surrounding the Upper Lock site presents unique challenges and opportunities for the future development of the area. The “Downtown East” neighborhood that encompasses the Historic Mill District (the site of the Upper Lock) is home to downtown business professionals and young families who enjoy living in close proximity to the Mississippi Riverfront, the Upper St. Anthony Falls, the Mill City Farmers Market, numerous local restaurants, and the many nearby thriving neighborhoods. Current population data places the immediate neighborhood’s population at 1,712 people.<sup>12</sup> The Downtown East neighborhood has been infused with over \$338 million dollars in strategic public investment, and about \$1.9 billion in private and nonprofit investment.<sup>13</sup> Over 5,300 new housing units have been completed or are under construction within easy walking distance from the Upper

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Regulatory Commission: “We do not think this unconstructed Crown Hydro project, that has been given ample time and opportunity to succeed but does not have site control after 20 years, is in the best interest of taxpayers and the community.” “The project will not protect and enhance wildlife resources, water quality, recreation, and cultural resources.” “The potential to damage significant historic assets and cut off access to the waterfront and cultural resources overwhelmingly outweighs the possible benefits that may be delivered to consumers.”

<sup>12</sup> Minnesota Compass, Downtown East Neighborhood Data, <http://www.mncompass.org/profiles/neighborhoods/minneapolis/downtown-east>.

<sup>13</sup> Ann Calvert, City of Minneapolis, CPED Department, and Rachel Ramadhyani, ASLA Minneapolis Park and Recreation Board, Minneapolis Riverfront Revitalization: Four Decades of Progress, at 14 (2012), [http://www.ci.minneapolis.mn.us/www/groups/public/@cped/documents/webcontent/convert\\_279837.pdf](http://www.ci.minneapolis.mn.us/www/groups/public/@cped/documents/webcontent/convert_279837.pdf).



Lock, over 7,000 jobs have been preserved or created in the Riverfront area, and over 4.5 million square feet of new office, commercial, and industrial space has been opened near the Upper Lock.<sup>14</sup>

In 2015 alone, construction, conversions, remodels, and additions of commercial and multi-family buildings in the Downtown East neighborhood increased at a consistent rate.<sup>15</sup> Review of major permitted construction projects (those greater than \$1 million) in each quarter of 2015 shows \$132.3 million in new construction projects in the Downtown East neighborhood.<sup>16</sup> Older buildings were more likely to be rehabilitated than condemned or vacated in the area surrounding the proposed Project site.<sup>17</sup> The rehabilitation and renovation of historic sites in the neighborhood evidences a desire in the community and across our state to maintain a human environment that honors and protects our rich historical assets, which is consistent with the Falls Initiative.

The Falls Initiative will create a significant number of jobs during construction and will supplement and enrich the neighborhood stimulating further economic growth by attracting tourists and visitors to the area.

A large number of cultural resources are known to exist within the Study area: 27 previously identified archaeological sites, 250 architectural/historical properties, and four historic districts were identified within the St. Anthony Falls Historic District.<sup>18</sup> The sheer number of archaeological sites and features already known attests to the need for care in evaluating alternatives and proposed uses.<sup>19</sup> The Upper Lock exhibits features that are consistent with criteria for its inclusion on the National Register of Historic Places,<sup>20</sup> including its age, its integrity and its historic role during the period of the timber and flour mills decline. The Falls Initiative is mindful of and will result in preservation of the invaluable cultural, historic, and archeological resources present in the area of the St. Anthony Falls Historic District.

### Natural Environment

The Falls Initiative was developed in collaboration with numerous organizations that have a primary mission of enhancing, preserving and increasing engagement with the natural environment, including the National Parks Conservation Association, Wilderness Inquiry and Minneapolis Parks Foundation, and reflects the collective goal of maintaining and improving the natural environment at the Upper St. Anthony Falls. The Mississippi River and the Upper St. Anthony Falls are a defining natural feature of our city, region and state. The Corps should avoid

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<sup>14</sup> *Id.* at 11.

<sup>15</sup> City of Minneapolis, Community Planning and Economic Development, Minneapolis Trends Reports, Q-1 2015 – Q4 2015 Reports, at 15, 18-20 (2015), [http://www.minneapolismn.gov/cped/resources/reports/cped\\_trends\\_reports\\_home](http://www.minneapolismn.gov/cped/resources/reports/cped_trends_reports_home).

<sup>16</sup> *Id.* at 20, table 6 (This figure was calculated by adding the projected construction costs used for permitting purposes for projects in the Downtown East neighborhood in the first, second, third, and fourth quarters of 2015. This figure is a conservative representation of new construction in the Downtown East neighborhood as it only captures projects with a construction cost greater than \$1,000,000 dollars for which a permit was granted.).

<sup>17</sup> *Id.* at 35.

<sup>18</sup> For a detailed discussion of the potential effects on these cultural resources refer to Exhibit D, at 17-26 (106 Group, Cultural Resources Compliance and the Crown Mill Hydroelectric Project Environmental Assessment (Sept. 30, 2016)).

<sup>19</sup> The National Register of Historic Places listed or eligible historic districts include: St. Anthony Falls Historic District (listed), the Minneapolis Warehouse District (listed), the Gateway Historic District (eligible), and the St. Anthony Falls Locks and Dams Historic District (eligible).

<sup>20</sup> National Register of Historic Places Program: Fundamentals, National Park Service, [https://www.nps.gov/nr/national\\_register\\_fundamentals.htm#start](https://www.nps.gov/nr/national_register_fundamentals.htm#start).

recommendations that would detract from the natural beauty of the Upper Falls, or that would decrease access to the Upper Falls to appreciate the natural environment.

Another important consideration is the impact of any alternative and proposed uses on the aesthetic flow of the St. Anthony Falls, which is an essential element of the district's character and value as a tourist destination. For generations, Minnesotans have appreciated the St. Anthony Falls. An estimated 2.8 million people cross the historic Stone Arch Bridge annually, from which they enjoy views up and down the River and directly overlook the Lock and St. Anthony Falls. The spectacle of the falls is also a point of interest from Mill Ruins Park, future Water Works Park, Water Power Park, and St. Anthony Main. National televised events hosted by Minneapolis regularly use footage of the falls, the Stone Arch Bridge, and the river as iconic elements, symbolic of place identity. The Corps should consider how the aesthetic flow will be affected by proposed uses if a disposition of the entire Upper Lock is considered. For example, construction of a hydroelectric power plant will significantly diminish the flow of the St. Anthony Falls. The Falls Initiative, on the other hand, will not interfere with the aesthetic flow and will enhance opportunities for visitors to enjoy the St. Anthony Falls.

### Recreational Opportunities

The Upper Lock and the surrounding area have rich recreational value.<sup>21</sup> The Upper Lock not only facilitates the relationship between citizens and the St. Anthony Falls, it is itself a physical environment with which many citizens have an educational and recreational relationship. The Falls Initiative will further promote and foster the recreational value of the Upper Lock and create a great attraction for citizens, tourists, and visitors. The Corps should work with the City and its partners, and consult with the National Park Service and the Park Board, to ensure the proposed disposition would support and enhance anticipated riverfront improvements, including access to trails surrounding the Upper Lock, fishing opportunities and other waterfront activation, water access and docking opportunities, and planned park development.

### ***Additional important factors and their cumulative impacts should be considered in the Study.***

Any studies by the Corps to consider disposal of Corps operated assets, particularly assets that are historically significant, must follow the guidance provided by Congress in the Water Infrastructure Improvements for the Nation (WIIN) Act of 2016.<sup>22</sup> The WIIN Act specifies in part that the historic significance of the asset that is subject to a disposition study must be considered: "in carrying out a disposition study for a project of the Corps of Engineers ... the Secretary shall consider the extent to which the property concerned has economic, cultural, historic, or recreational significance or impacts at the national, State, or local level."<sup>23</sup> Additionally, cumulative impacts on the cultural, historic, archeological, socio-economic, recreational and other resources of the St. Anthony Falls Historic District may be required to be addressed as well.<sup>24</sup>

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<sup>21</sup> The Council on Environmental Quality (the "CEQ") regulations direct federal agencies to interpret the human environment "comprehensively to include the natural and physical environment and the relationship of people with that environment." Human Environment, 40 CFR § 1508.14 (2016).

<sup>22</sup> Pub. L. No. 114-322.

<sup>23</sup> WIIN Act, § 1165

<sup>24</sup> Consideration of Cumulative Impacts in NEPA Review of NEPA Documents, <https://www.epa.gov/sites/production/files/2014->

FL&D agrees with the Corps' statement during the original Disposition Study kickoff meeting on July 18, 2018 that cultural and economic impacts and relevant guidance and public interest identified in all adopted plans and resolutions need to be reviewed and considered by the Corps in making its recommendation and actions. The review should include public safety matters through consultation with the Hennepin County Water Patrol, Minnesota Department of Public Safety, Minneapolis and St. Paul Fire and Police Departments, and other relevant public safety agencies.

### ***Summary of Comments and Recommendations.***

We request and encourage the Corps to proceed with the study as follows:

1. Consistent with the plain language of the Act and the Congressional Intent Letter, the study should focus on a partial disposition, and the partial disposition should reflect coordination (“a joint plan”) with the City to further local adopted plans for the central riverfront.
2. We encourage the Corps to conduct the disposition study and the subsequent partial disposition as expeditiously as possible.
3. We encourage the Corps to continue to own and operate those portions of the Upper Lock necessary to maintain flood control.
4. The Corps should make recommendations that are in the public interest, and should give significant weight to the statements of numerous Upper Lock stakeholders and the City resolution that development of a hydroelectric power plant on the Upper Lock would be counter to the public interest. Furthermore, the Corps should conclude that a hydroelectric power facility cannot coexist with the envisioned public use of the land because it would be incompatible with providing access to hazard-free water for boats and people on both the upriver and downriver sides of the property.
5. Human Environment – The Corps should make recommendations that enable future uses at the Upper Lock to improve the human environment by transforming underutilized property into additional economic and cultural assets and creating a world class destination to activate the community's relationship with the river.
6. Natural Environment - The Corps should make recommendations that will protect the natural beauty of the Upper Falls, including ensuring that the aesthetic flow over the dam at the Upper Lock is consistent with the public interest; furthermore, the Corps should make recommendations that consider the opportunity to enhance the natural environment at the Upper Falls, including through environmental restoration & water stewardship.
7. Recreational Opportunities - The Corps should work with City and its partners, and consult with the National Park Service and the Park Board, to ensure the proposed disposition would support and enhance anticipated riverfront improvements, including access to trails



surrounding the Upper Lock, fishing opportunities and other waterfront activation, water access and docking opportunities, and planned park development.

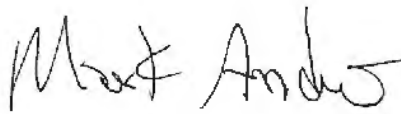
8. The Corps should consider the historical significance of the Upper Lock on the cultural, historic, archeological, socio-economic, recreational and other resources of the St. Anthony Falls Historic District.

9. The Corps should undertake to gain awareness of, and make recommendations consistent with, the relevant guidance and public interest as defined in all adopted plans and resolutions that will be impacted by the Corps' recommendation and actions.

10. The study should include a review of public safety matters through consultation with the Hennepin County Water Patrol, Minnesota Department of Public Safety, Minneapolis and St. Paul Fire and Police Departments, and other relevant public safety agencies.

Thank you for the opportunity to comment on the scope of the Study and express our interest in the future of the Upper Lock. If you have any questions regarding our comments, please contact Kjersti Monson at (612) 836-8266 or by email at [kjersti@thefalls.com](mailto:kjersti@thefalls.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Andrew". The signature is fluid and cursive, with the first name "Mark" and last name "Andrew" clearly distinguishable.

Mark Andrew, President  
Friends of the Lock & Dam  
900 N 3<sup>rd</sup> Street  
Minneapolis MN 55401

Cc: Paul Reyelts, Chair of the Board, Friends of the Lock & Dam  
Mark Wilson, Vice Chair, Friends of the Lock & Dam  
Kjersti Monson, Project Director, Friends of the Lock & Dam

## UNIVERSITY OF MINNESOTA

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October 18, 2019

*Sent via e-mail at [mplslocksdisposition@usace.army.mil](mailto:mplslocksdisposition@usace.army.mil)*

Attn: Nanette M. Bischoff, Project Manager (PM-B)  
US Army Corps of Engineers  
180 5th Street East, Suite 700  
St. Paul, Minnesota 55101-1678

Dear Ms. Bischoff.

The University of Minnesota (the University) appreciates continuing to be part of the discussions regarding the Minneapolis/St. Paul locks disposition studies. Following the public meetings held by the USACE Saint Paul District in August 2019, the University is submitting these comments in line with its mission and with specific focus on Section 216 of the Disposition Study, Upper St. Anthony Falls Lock and Dam, Upper Mississippi River. The University — due to its multidisciplinary nature — interacts with the study area in multiple ways:

**Saint Anthony Falls Laboratory.**

Research at the Saint Anthony Falls Laboratory (SAFL) at 2 Third Street SE is intimately tied to the river. Currently the University is exploring a SAFL proposal to develop a facility to support research in small modular hydropower; however, the University has ruled out the Upper Saint Anthony Falls Lock as a potential site for this research program. At the existing SAFL facility, any operational changes to the lock that would alter the flow and regulation of water levels would greatly impact the flood control provided by existing structures and would jeopardize SAFL's ability to continue its 80-year legacy of world-renowned research.

The existing Upper St. Anthony Falls pool is the only intake for river water into SAFL, flowing at a maximum of 300 cubic feet per second. This flow is used for research throughout the Laboratory including the Outdoor Stream Lab. Changes in operational protocols at the lock that would alter the elevation of water in the upper pool could damage SAFL's intake structures, intake foundation, and ability to access water. Changes at the Upper SAFL lock could also increase the potential for flooding on Hennepin Island. Similarly, the intermediate pool, between Upper St. Anthony Falls and the Lower St. Anthony Falls, is the receiving waterbody for the outflow of river water from SAFL. An increase in pool elevation due to changes at either the upper or lower lock and dam could result in backwater into SAFL, which would damage research facilities and reduce research space. SAFL's lowest research area floods at a pool elevation of approximately 752 ft.



**Irene Claudia Kroll Boathouse.**

The Irene Claudia Kroll Boathouse located at 550 East River Parkway, in East River Flats Park, is the only river access point for the University's rowing programs. Rowing at the University has been a Division 1 Women's Varsity sport since 2000 and a Men's Club Sport since 1957. Pool 1 between the Lower St. Anthony Falls Lock and Dam and Lock and Dam No. 1 provide ideal practice and competition water conditions for the Women's Varsity and Men's Club Rowing teams. From February through November, over 150 athletes use the river Monday through Saturday, and the dams are critical in ensuring that flows are kept within a safe range below 30,000 cubic feet per second.

**Elmer L. Andersen Library Caverns.**

The University's Elmer L. Andersen Library caverns, completed in the year 2000, hold and provide environmentally controlled storage for many rare, unique, and irreplaceable books, manuscripts, artifacts, and map collections with an estimated value close to \$1 billion. The design took into account overland flow levels to avoid flooding during a 500-year flood, and a groundwater drain and pump system was installed around the perimeter to prevent flooding from groundwater flow based on the river's conditions. Major changes in the infrastructural composition of the locks and dams could dramatically change the forecasted 500-year flood level and allow water infiltration of the Andersen Library caverns due to flooding, thereby damaging these rare and valuable collections.

**District energy and steam heat production and distribution.**

The University of Minnesota Twin Cities campus operates two steam/energy plants within the study area: The Southeast Steam Plant at 600 Main Street SE, adjacent to the Lower St. Anthony Falls Pool, and the Main Energy Plant at 1180 Main Street SE, adjacent to Pool 1. A network of several miles of lined sandstone tunnels dating back to the early 1900s carries the steam distribution piping to all University buildings on both sides of the Mississippi River, providing heat and processing steam critical to campus operations. Water from the river could enter the tunnels before the 100-year event is reached.

**Storm sewer outfalls.**

In partnership with the City of Minneapolis and the Mississippi Watershed Management Organization, the University owns and operates several storm sewer outfalls in the study area.

These comments are intended to highlight information previously communicated that is particularly relevant to the disposition study. Through its multidisciplinary teaching, research and outreach the University is already a contributor to both the human and recreational environments on which the study seeks feedback, and the University welcomes the opportunity for further engagement in those areas. As stated above, major infrastructural or operational

Nanette M. Bischoff, Project Manager (PM-B)  
October 18, 2019  
Page 3

protocol changes of the locks that would alter the river's flow could potentially have a catastrophic impact on the University's energy management, the Elmer L. Andersen Library caverns, the Irene Claudia Kroll Boathouse facility at East River Flats — both of which were designed and built considering overland flow levels to avoid flooding during a 500-year flood — and jeopardize the infrastructure and research work at SAFL.

The University welcomes continued engagement and appreciates the opportunity to present its concerns regarding the potential impacts of disposition on its mission, activities and infrastructure.

Sincerely,



Matt Kramer  
Vice President of University Relations



Michael Berthelsen  
Vice President of University Services

MK:MB:egl



MINNEAPOLIS  
**PARKS**  
FOUNDATION

October 18, 2019

Ms. Nanette Bischoff  
Project Manager  
St. Paul District, Corps of Engineers  
180 Fifth Street, Ste 700  
St. Paul MN 55101-1638

Submitted via email to: [MplsLocksDisposition@usace.army.mil](mailto:MplsLocksDisposition@usace.army.mil)

RE: 2019 Upper St. Anthony Falls Lock and Dam Disposition Study

Dear Ms. Bischoff –

Thank you for the opportunity to comment on the U.S. Army Corps of Engineers (Corps) disposition study for the Upper St. Anthony Falls Lock and Dam (USAF). As an independent, community-supported nonprofit that helps transform human life through parks and public space, the [Minneapolis Parks Foundation](#) and our stakeholders have a vested interest in the future of the USAF. This comment will focus on the revised scope and impact as outlined by the Corps in August 2019.

As you know, the Parks Foundation, together with our partner the Minneapolis Park and Recreation Board, broke ground on Water Works in August 2019. This \$30 million transformative park project is a community-led effort that will bring significant new historic, cultural, and recreational amenities to the most iconic location in Minnesota; its park pavilion, embedded in existing historic mill remnants, will be a year-round destination, while the five-acre park grounds will be enjoyed by the public 365 days a year. Water Works Mezzanine Phase will open to the public in fall 2020.

The Parks Foundation supports the decision to consider disposition of the USAF separate from the Lower St. Anthony Falls Lock and Dam and Lock and Dam #1. The Parks Foundation believes that the Corps study scope, as defined under the National Environmental Policy Act and as presented in August 2019, is reasonable. It's within this context that we offer specific comment regarding the following.

#### **Relevant Redevelopment Proposals**

The Parks Foundation is championing re-investment in the Central Mississippi Riverfront Regional Park through our \$18 million RiverFirst Capital Campaign. [RiverFirst](#) is a Minneapolis Park Board-led vision for regional parks and trails that will transform the Minneapolis Upper Riverfront – from the Stone Arch Bridge upriver to the city's northern limit – into a world-class cultural and recreational destination for residents and visitors, as well as an economic engine for the Twin Cities region. In addition to Water Works, RiverFirst projects that are planned or already in development that it is vital the Corps take into consideration include the [Great Northern Greenway River Link](#), the riverfront park at [Upper Harbor Terminal](#), [Hall's Island restoration](#), and [Graco Park](#).

#### **Human Environment**

We believe there is tremendous opportunity in repurposing the USAF as a year-round visitors' center, as has been demonstrated by the ongoing partnership between the Corps, the National Park Service, and its non-profit partners. Any future action at USAF should prioritize the human desire to connect with St. Anthony Falls, the only natural feature of its magnitude on the Mississippi River, and one of the most visible and iconic destinations in the Twin Cities region.

-more-



The concept known as The Falls is consistent with this approach and we endorse the Friends of St. Anthony Falls's vision, as supported by the City of Minneapolis.

We ask that the Corps place particular emphasis on the site's archeological, historic, and cultural value, from pre-industrialization to today. Where once a "working river" was important to early industrialists, today we see people connecting to the river through recreation and culture. And St. Anthony Falls remains a place sacred to Indigenous people from time immemorial; we have a responsibility to uphold and honor that tradition for generations to come.

### **Natural Environment**

The view of, and proximity to, St. Anthony Falls is without question the overwhelming draw for visitors to the Central Riverfront. It is essential that the Corps prioritize views of the falls. Future plans for the site that would be incompatible with this goal including new or increased hydropower, which would threaten the aesthetics of the falls and, most likely, limit public access to the site and therefore diminish experiential opportunities. The 2014 decommissioning of USAF opened up the opportunity naturalize the shoreline adjacent to the lock, as envisioned in the Water Works Riverfront Phase. Not only would this be beneficial for recreation (see below), but it could also provide environmental benefits through shoreline management and storm water filtration.

### **Recreational Opportunities**

Critical to the success of the Water Works Riverfront Phase are two recreational elements made possible when the USAF was decommissioned. Reopening the intake channels and tailraces will eliminate critical portages at St. Anthony Falls, effectively purging planned recreational boating. Further, planned trail realignment to follow the original rail lines is improved with better shoreline access. Not only is the trail realignment important for the aesthetic enjoyment of the site – including views of the Falls and USAF itself – but it is also critical to improved safety, as the popularity of the site for both biking and walking continues to grow.

Based on the above, it is our opinion that partial disposition of USAF presents the greatest benefit to the public. We urge the Corps to prioritize the long-term vision for Minneapolis's Central and Upper Riverfront, which will transform the public's experience of the Mississippi River from one of disconnection to that of connection – to history, to culture, to the natural world, and to each other.

USAF stands as a great symbol of American optimism, industriousness, and ingenuity. At the time it was conceived and constructed, it was intended to reap opportunity for our community; today, it still can, but only if its benefits are not privatized to advantage only the few. For this reason, it is our opinion that the highest and best use of the USAF is partial disposition, in which the Corps maintains the USAF structure as needed for pool management, flood control, and other essential activities, and a private-sector partner operates a new visitor center for world-class public access.

Thank you.

Sincerely,



**Tom Evers**  
Executive Director

## Upper St. Anthony Falls Lock Disposition Study Public Meeting Comment Sheet – August 2019

Persons submitting comments are advised that all comments received will be available to the public, to include the possibility of posting on a publicly accessible website. Commenters are requested not to include personal privacy information, such as home addresses, in their comments unless they do not object to such information being made available to the public. These comments will be used to prepare a preliminary draft Disposition study report and environmental scoping document, in accordance with the National Environmental Policy Act.

Name: [REDACTED] \_\_\_\_\_ affiliation (optional): \_\_\_\_\_

Please provide your Zip Code: 55105 \_\_\_\_\_

Please check the category/ies below that best represent the nature of your comment/s [Check all that apply]:

- |   |  |
|---|--|
| <input type="checkbox"/> Communication/Coordination                 | <input type="checkbox"/> Ownership                           |
| <input checked="" type="checkbox"/> Cultural and Historic Resources | <input checked="" type="checkbox"/> Public Access            |
| <input type="checkbox"/> Dam Removal                                | <input type="checkbox"/> Public Safety                       |
| <input type="checkbox"/> Economics                                  | <input type="checkbox"/> Recreation                          |
| <input checked="" type="checkbox"/> Environmental                   | <input type="checkbox"/> Sediment/Water Quality/Water supply |
| <input checked="" type="checkbox"/> Future Use                      | <input checked="" type="checkbox"/> Social concerns          |
| <input type="checkbox"/> Flooding                                   | <input type="checkbox"/> Study scope                         |
| <input type="checkbox"/> Hydropower                                 | <input type="checkbox"/> Other (please specify)              |
| <input type="checkbox"/> Invasive Species                           | _____  |
| <input type="checkbox"/> Navigation                                 |  |

\_\_\_\_\_ The long history of Saint Anthony Falls dates far before Saint Anthony and includes a rich cultural \_\_\_\_\_  
\_\_\_\_\_ history with the Native American communities in the region. When inquiring about outreach to the Native \_\_\_\_\_  
\_\_\_\_\_ American Communities during the public comment period, it was evident that more could be done to gain \_\_\_\_\_  
\_\_\_\_\_ the support for the future plan of the falls and lock and dam from that community, especially concerning the \_\_\_\_\_  
\_\_\_\_\_ potential rebuilding or commemoration of Spirit Island that was destroyed to put in the Dam. How is the \_\_\_\_\_  
\_\_\_\_\_ Army Corps of Engineers continuing to engage with the Native American Communities to better this site for \_\_\_\_\_  
\_\_\_\_\_ future generations?

\_\_\_\_\_ The dam itself holds significance and removing it would be extremely misfortune. It holds \_\_\_\_\_  
\_\_\_\_\_ educational significance to the history of the region. However, there needs to be a comprehensive master \_\_\_\_\_  
\_\_\_\_\_ plan that involves the Army Corps of Engineers, XCEL Energy, the City of Minneapolis, the Park Board, \_\_\_\_\_  
\_\_\_\_\_ and other parties that details a long range plan for the falls, the lock and dam, and the cultural significance \_\_\_\_\_  
\_\_\_\_\_ dating back to the Native American history on the site. When inquiring about this master plan during the \_\_\_\_\_  
\_\_\_\_\_ community engagement meeting, it was clear that no such plan exists. Moving forward with any action \_\_\_\_\_  
\_\_\_\_\_ without a comprehensive plan may be devastating. Saint Anthony Falls is an essential identity maker for \_\_\_\_\_  
\_\_\_\_\_ Minneapolis and the State. How is the Army Corps of Engineers contributing to the long term success of the \_\_\_\_\_  
\_\_\_\_\_ Riverfront, the historical significance, and the overall legacy of the falls and this site?

In addition to the above topics, the Study Team would appreciate your input to the following:

1. How can we maintain/improve the human environment at Upper St. Anthony Falls lock?  
Provide educational and environmental learning opportunities for the public. Revitalize the falls and the lock to connect people and place in new ways that expand understanding for future generations.
2. How can we maintain/improve the natural environment at Upper St. Anthony Falls lock?  
Consider returning the falls to a more natural or dramatic state, similar to the way they were before industry and interventions without destroying the lock and dam and its historical significance.
3. How can we maintain/improve recreational opportunities at Upper St. Anthony Falls lock?  
The dangers of a falls is self evident. Part of the intrigue of this site is it's tremendous power. Recreational opportunities, such as kayaking on the upper Mississippi and rowing in the gorge already exist and work.

Comments can be handed in during the meeting, mailed to the address shown, or emailed to [MplsLocksDisposition@usace.army.mil](mailto:MplsLocksDisposition@usace.army.mil). We would appreciate your comments by October 20, 2019.

-----fold-----

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US Army Corps of Engineers  
180 5th St. East, Suite 700  
St. Paul, MN 55101-1678  
Attn: N. Bischoff (PM-B)



## Goergen, Lexi B CIV USARMY CEMVP (USA)

---

**From:** Bischoff, Nanette M CIV USARMY CEMVP (USA)  
**Sent:** Monday, October 21, 2019 7:29 AM  
**To:** Goergen, Lexi B CIV USARMY CEMVP (USA); Keenan, Sierra L CIV USARMY CEMVP (USA); Potter, David F CIV USARMY CEMVP (US)  
**Subject:** FW: [Non-DoD Source] Coalition input per your request...  
**Attachments:** Coalition Maps & Principles.pdf

We may want to include this in the scoping comments. This was provided by FotLD (Kjersti Monson) in response to a separate request in which I had asked for the raw comments they had gathered at past coalition meetings.

Nanette M. Bischoff, P.E.  
Project Manager/FERC Coordinator  
(651) 290-5426

-----Original Message-----

From: Kjersti Monson [mailto:kjersti@thefalls.org]  
Sent: Friday, October 18, 2019 5:32 PM  
To: Bischoff, Nanette M CIV USARMY CEMVP (USA) <nanette.m.bischoff@usace.army.mil>  
Subject: [Non-DoD Source] Coalition input per your request...

Nan,

Here's the coalition input that you requested - we collected the most relevant comments regarding future use at Coalition Meeting #2 in 2017. Please find a summary of that input attached, entitled "Coalition Maps & Principles." The more recent engagement that was undertaken (at Coalition Meeting #4) was focused on design values, so upon review it's a little less directly applicable (I sense that topics like materiality are not so relevant). However, I do have a lot of input from that meeting that I'd be happy to share if it should be deemed relevant.

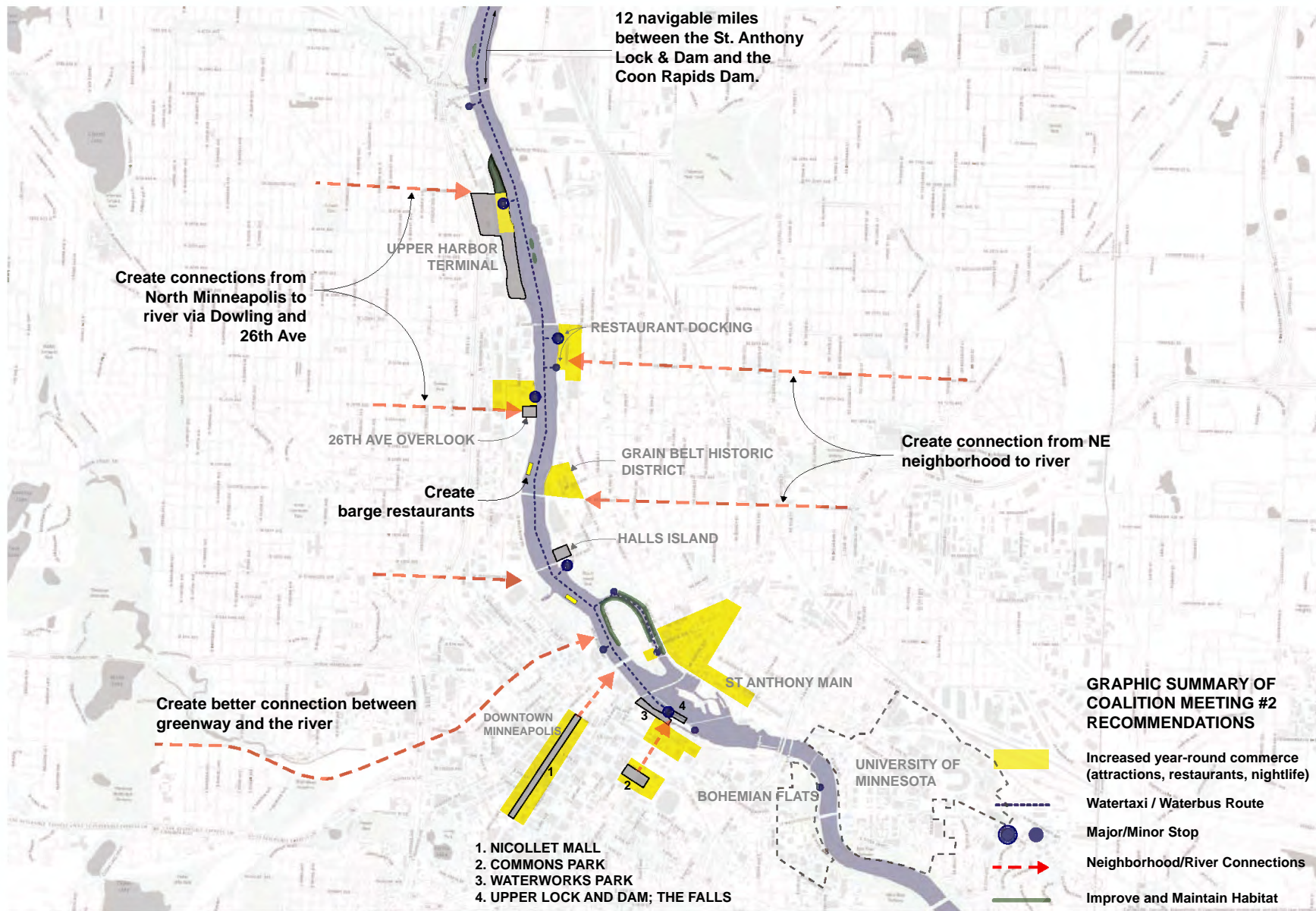
Thanks again for the opportunity to provide public comment on the study. So you know, we're also working on a more detailed letter to outline FL&D's acquisition interests. That second letter will be forthcoming soon, potentially as early as next week.

All the best,

--

Kjersti Monson  
Director, The Falls Initiative  
Friends of the Lock & Dam  
tel: 612.836.8266 | e: kjersti@thefalls.org <mailto:kjersti@thefalls.org> Blockedwww.thefalls.org

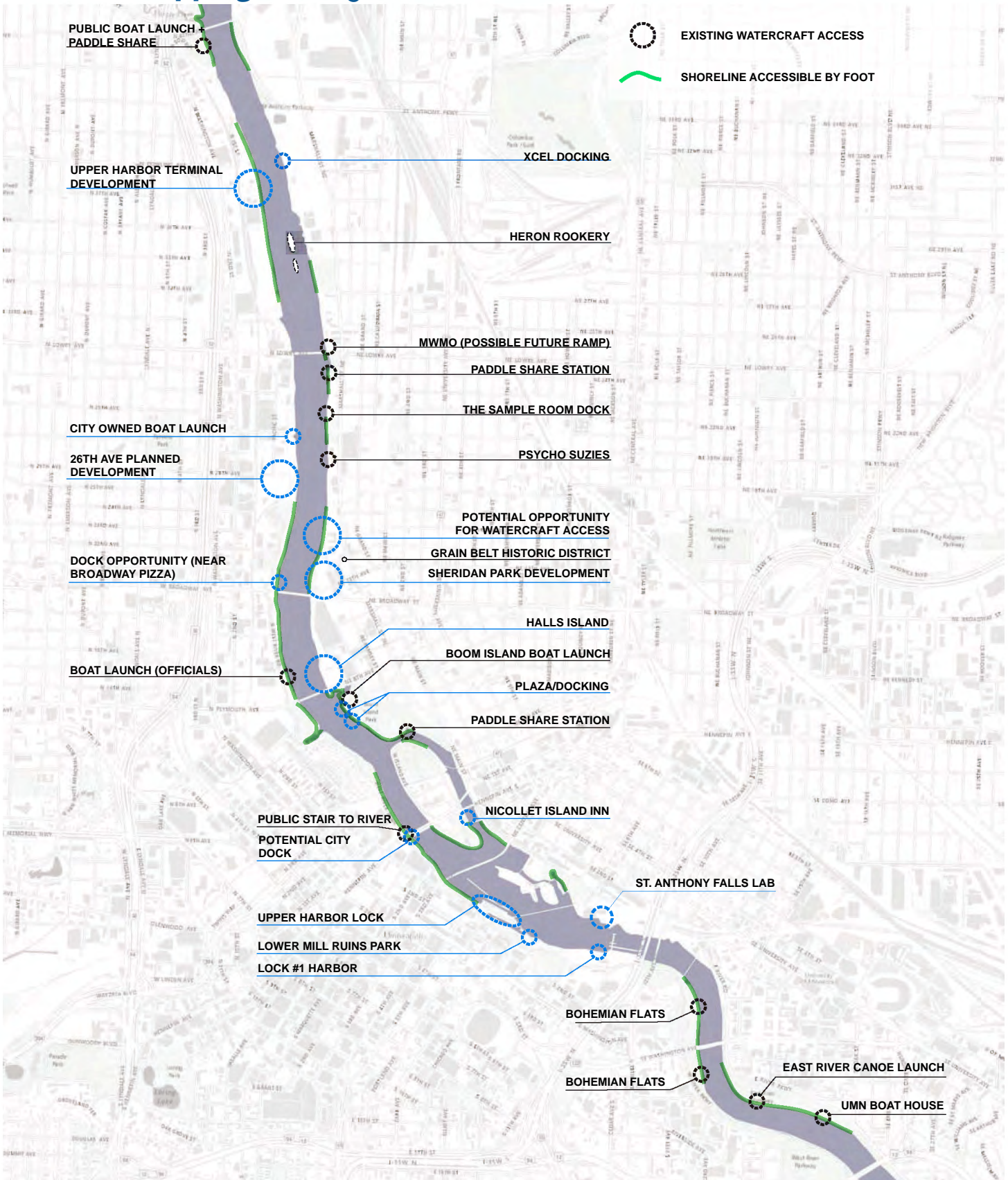
## Coalition Mapping: Recommendations for Programming & Connectivity



This map depicts input from 48 participants in 6 small groups representing 21 organizations.



# Coalition Mapping: Existing & Recommended Water Access



This map depicts input from 48 participants in 6 small groups representing 21 organizations.





## UPPER LOCK COALITION MEETING #2: OUTCOMES

Coalition Meeting #2 on November 2, 2017 was a poster session and workshop focused on programming. Participants explored the Lock's role as a hub on the Central Riverfront, and as an anchor destination within the broader vision for the riverfront above the Falls - from the Lock to Upper Harbor Terminal. 18 organizations presented projects or initiatives in the poster session. 48 people representing 21 organizations attended. Attendees held small group discussions at workshop tables, developing recommendations for vision & program. Principles and recommendations were made at two scales: the scale of the whole upper river, and the scale of the Lock. Below, the *UPPER LOCK: Principles & Recommendations* section summarizes recommendations for the identity and program of the Upper Lock specifically; while the *CENTRAL & UPPER RIVERFRONT: Principles & Recommendations* consider a bigger riverfront vision above the Falls.

### ***UPPER LOCK: Principles & Recommendations***

#### **1) The Lock should be a place where stories are told & knowledge is gained.**

The USACE story of civil works and water management.

The story of the system of parks in our region.

The story of St. Anthony Falls, beginning with American Indian stories.

Educational components to river barging/lock infrastructure/history.

Interactive learning.

The story of the Mississippi as a drinking water source.

The St. Anthony Falls Hydrology Lab (in view across the river) could be highlighted/engaged.

The Lock could be the interpretive hub that ties many stories together.

The story of the river & water + culture through time.

The history of commercial navigation.

The story of the neighborhood.

Tell the story of the site and its historical aspects.

Play off sound.

Interpretation of USACE use.

River stories.

Get beyond restaurants, beyond tourists.

## **2) The Lock should be a place where you can get on the water.**

Activate the river itself – water taxi & transport, water recreation outfitting.

Access to the water by paddle, water taxi, water bus, "Uber boat," or tour boat - concept of "water trails."

Boat tours, boat access – active Port

Shared/coordinated programming among the Lock, WaterWorks, and the Commons

Provide the opportunity for people to connect with water in many ways.

The Lock as the northern "anchor destination" on the Mississippi.

Lateral connections along the riverfront by water.

Ensure safety of kayaks and canoes on the river by the Falls.

## **3) The Lock should be a place where you can get something to eat.**

Restaurants: yes. Tourists: yes. And beyond.

Riverfront restaurants or on-river dining (eg. Barge restaurants).

## **4) The Lock should be a stage for culture, events, & entertainment.**

Art on the Lock.

Events related/in partnership with other nearby venues (Stadium, Guthrie, "Walker on the Water," Convention Center, Armory, etc.)

Lock & Dam/Commons/WaterWorks – these programs will be shared.

Music on the river - go from UHT concert to Halls Island concert to Lock concert.

Interactive learning.

Urban orchard.

## **5) The Lock should be a recreation destination.**

Learn: what can I do in X amount of time? Walk, bike, paddle opportunities.

Wayfinding + Time: what can I do in 30 minutes or an hour?

Support and work with outfitters to make more experiences possible for people arriving at the Lock.

Recreation: Skate park, Adventure, Winter biking/skating.

Walk, bike, paddle opportunities.

**6) The Lock should serve as a “trailhead” to the rest of the riverfront, region, and beyond – a natural hub & an anchor destination.**

The Lock should be the northern "anchor destination" on the Mississippi.

The Lock has an identity as part of the Great River Road, as part of the Mississippi, as the hub of the downtown Central Riverfront, & as the gateway to the Upper Riverfront.

Create more walk/bike connections to the riverfront from the Lock, and provide wayfinding.

Send people out on loops (20 minute walking tours; longer tours with other modes; connected loops).

Access to curated trail - e.g. at least 10 points of interest to achieve a critical mass of users.

Display maps of state/regional parks.

Trailhead - Centerpiece for a variety of trails – walk/bike/paddle.

**7) The Lock must be accessible to people of all ages and abilities.**

Make sure spaces are accessible by means other than stairs.

**8) The Lock can be branded and marketed as a major destination.**

"Package" the entire experience of the Lock in a compelling way.

Plan for being the visitors' launch pad to the whole riverfront, and the region - and brand the Lock as access to that experience.

## ***CENTRAL & UPPER RIVERFRONT: Principles & Recommendations***

**1) The Riverfront should have a defined year-round brand that is marketed & supported by businesses and programming.**

Do we need an umbrella group?

Consider seasonality of programming throughout.

Need more of a branding effort, umbrella effort - perhaps a master plan.

Partnership with adjacent venues and organizations ("sales team").

Rebrand the river for recreational use in a way that doesn't scare off novices.

Bring the tourists in and the amenities will follow; residents will benefit.

"Package" the entire experience of the river in a compelling way.

The riverfront should be activated year-round.

Organized activities (e.g. with the Park Board) – morning/afternoon/night; 1-hr/3-hr/half-full day.

More "branding" – umbrella bringing all things together.

Businesses & programming partners can contribute to riverfront brand.

Nurture public private relationships – Access + Commerce.

"Spaces of interchange" between local businesses and the parks/river.

Master plan?



## **2) The Riverfront should be a place to have authentic experiences of many kinds: sporty, cultural, night-out, sightseeing, family fun, commuting, learning.**

Work with Art-a-Whirl, MIA, and other groups.

The Central & Upper Riverfront should be conceived as a state project tied to the National Park & Great River Road.

There should be more restaurants on the riverfront, and on the river (food barges).

Create places for people to connect with the waterfront - "activity nodes."

Trail - at least 10 really interesting points of interest – enough critical mass to draw people

How is water relevant to different cultures? Functional, representational, spiritual, habitat.

Loops (walking, running, biking, kayaking).

Safe water experiences.

Flexible places to connect with water.

Flexible areas for activity nodes.

Seasonality – ensure unique, all season interest.

More restaurants – even floating barges.

Nicollet Mall to the River as an experience.

From recommendations for Lock programming (#5 above):

- Skate park
- Adventure
- Winter biking/skating
- Support and work with outfitters to make more experiences possible
- Walk, bike, paddle opportunities

## **3) The Riverfront should be an amenity that is accessible to, and utilized by, all communities.**

Look for local audiences that are not currently on or using the river, and plan for how they could.

Facilitate active community engagement for riverfront projects.

Create riverfront programming related directly to the neighborhoods on the river.

Coordinate affordable housing opportunities with proximity to river/parks.

Active community engagement.

## **4) Riverfront destinations should be connected to each other and to the city.**

### ***a) Connections by water should be expanded.***

Points of access for people to get onto the river should expand along the riverfront

Possible "stops": N. Mississippi Park, UHT, 26th Ave on West side, MWMO, Halls Island, Waterworks Phase II)

Lateral connections along the riverfront with water transportation at each should be pursued.

Plan and educate for safety (canoeing/kayaking on the river near the Falls)

Water Taxi, expansion of PaddleShare

Water trail, water taxi, water bus, boat share, barges & river transportation

**b) *Connections for walking and biking should be present.***

More NiceRide stations and other outfitters should be present.

Create loops (20 minute walking tours; longer tours with other modes; connected loops)

Achieve easier access for biking and walking the riverfront - especially on the aggregate side of the river

Solve barriers to connectivity along the riverfront (e.g. cantilevered paths to cross gaps where necessary).

**c) *Wayfinding should be improved.***

Bring the tourists in and the amenities will follow. Residents will benefit from those investments.

Create spaces of interchange between businesses and parks on the riverfront.

Wayfinding for the entire riverfront would make it more accessible to people.

Solve the wayfinding challenge.

**d) *More and better connections between the city and the river should be in place.***

Connect the end of Nicollet Mall to the river, and remove the Post Office parking structure.

Connect Nicollet to river.

How does Dinkytown Greenway connect to the river?

Create more visual connections that lead you to the river.

Don't forget the Granary corridor, and connections south.

Note that the 35W bridge was built to suspend a trail underneath it.

Achieve connections to the East side of the river and to Northeast Minneapolis.

Provide more points of access to the riverfront.

More points of access to the river are needed.

More connection to the river (walk/bike) – overcome barriers, improve wayfinding

Enhance key street connections like at Nicollet/Hennepin, Portland, N. 26<sup>th</sup>, Dowling, Broadway, Plymouth, and Lowry.

**5) Local, state, & federal interests align around the potential of the Central & Upper Riverfront.**

Govt should care about greater economic development impact/potential.

Project should be important to the state – enhances the Great River Road National Scenic Byway.

The Central & Upper Riverfront should be conceived as a state priority project tied to the National Park & the Great River Road.

The City and Park Board need to prioritize these projects - how do we get there?

Meet Minneapolis could be a partner to drive awareness of city/river experiences.

Larger regional connection - Coon Rapids?

The Mississippi River Cities & Towns Initiative has led to the creation of a Mississippi River Congressional Caucus – MN delegation members of that caucus should be engaged.

The Mississippi National River Recreation Area represents federal interest in the riverfront.

#1 Park System in the Country

Opportunity to display maps from other state & regional parks.

**6) The experience and richness of the Riverfront is enhanced by habitat.**

Culture + water + habitat.

Support migratory birds and river wildlife (turtles, fish) with habitat & vegetation.

Interpretation & education about habitat and river life.

---END---



**From:** [Christine Goepfert](#)  
**To:** [Bischoff, Nanette M CIV USARMY CEMVP \(USA\)](#); [Kjersti Monson](#)  
**Cc:** [Keenan, Sierra L CIV USARMY CEMVP \(USA\)](#)  
**Subject:** [Non-DoD Source] RE: sharing comments from the "Transform the Lock" and "the Falls" workshops.  
**Date:** Thursday, August 29, 2019 2:37:13 PM  
**Attachments:** [Advisory Team Transforming the Lock.pdf](#)  
[Advisory Team Workshop Notes\\_3-20-17.docx](#)  
[7.jpg](#)

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Hi Nan - I appreciate you wanting to cover all the bases! So the Transforming the Lock book is meant to capture all of the ideas that we yielded through the Advisory Group workshop and public meeting. It also includes the list of advisory group invitees.

Per your request, I've also attached the Advisory team list and Advisory Team workshop notes, which includes the questions and comments. I have pics from the public meeting with the notes folks left on the boards. I've attached one so you can see it. There is a total of nine pics. I'll send them all if you think they are helpful?

Please let me know if you have any questions. Thanks!

Best,  
Chris

-----Original Message-----

From: Bischoff, Nanette M CIV USARMY CEMVP (USA) <nanette.m.bischoff@usace.army.mil>  
Sent: Thursday, August 22, 2019 1:26 PM  
To: Christine Goepfert <cgoepfert@npca.org>; Kjersti Monson <kjersti@thefalls.org>  
Cc: Keenan, Sierra L CIV USARMY CEMVP (USA) <Sierra.L.Keenan@usace.army.mil>  
Subject: sharing comments from the "Transform the Lock" and "the Falls" workshops.

Chris and Kjersti,

would the NPCA and the Friends be willing to share the invitees, the questions that were posed, and the comments that were gathered in the workshops that were conducted for the transform the Lock and the Falls coalition?

I live in fear that no one will respond to our request for comments from our recent meetings (ideas to maintain/improve natural environment, human environment and recreational opportunities).

It might be helpful to see the raw ideas that other workshops yielded.

We are considering whether or not to conduct additional focused workshops.

Nanette M. Bischoff, P.E.  
Project Manager/FERC Coordinator  
(651) 290-5426

## **St. Anthony Falls Lock Workshop Notes**

**March 10, 2017**

The meeting began at 9:06 a.m.

Chris Goepfert kicked things off, describing the purposes of the workshop:

1. Develop a vision for a world class visitor center at the St. Anthony Falls lock; and
2. Ways to move the vision forward.

Chris reviewed the methodology/background of events leading to the present, noting that the presence of the National Park Service allows for the gold standard for visitor center experiences.

Mississippi National River Recreation Area Superintendent John Anfinson framed up a vision for the lock, describing a “fourth age” recognizing its past natural, boom town, and industrial pasts. Landmarks are part of the American story – St. Anthony Falls is the kind of place you find a national park. The Falls area, where the lock is now, has not been accessible to the public since 1854, when Minnesota was not yet a state.

John posed some questions to the group:

- What role does the lock and falls play in the whole Mississippi River?
- How does it fit in the realm of our Midwestern national parks? Lock project even higher.

This project will drive visitation to Minneapolis and, as such, has been recognized as an important element of the city’s Tourism 2030 plan.

Tom Meyer described the effort up until this point, noting that the community had undertaken this type of project before with great success. He framed up the “pre design” concepts, which included visuals of possible improvements at the lock and open up possibilities.

Tom noted that the idea to re-open the lock to public access had been around for a long time and that achieving this vision will require collaboration, as with past projects at the waterfront. However, given the USACE disposition study following the lock’s closure to navigation, the opportunity to improve access to the falls via the lock was greater than at any time in the past.

Tom reviewed, briefly, the historical context of the lock, its scale, and its place in the national park, including the lock’s place in the “one park, three anchors” concept. He also reviewed other proposed and planned improvements around the lock site, access needs, and public feedback on the visitor center thus far.

Chris outlined the challenges to the project, which included ownership responsibility, the lingering hydroelectric proposal, and funding.

At this point in time, Federal regulators are considering the draft EA for the hydro project. Unfortunately, the reviewing body (FERC) does not have enough members to formally consider it at present. There is also an aesthetic flow study also being done by Xcel, which would analyze the impact to flow over the falls if the hydro project were to be built.

Those present discussed the materials presented by Chris, John, and Tom. Questions arose from the group primarily regarding the USACE disposition study. USACE staff were clear that they’d prefer to have

no ownership of the lock, but federal law requires them to be present for flood control. Disposition studies must be 100% federally funded. While there is no funding available at the moment, the study must be funded by 2019. When initiated, the study will need congressional authorization and 50% local funding match.

--BREAK--

The larger group then broke up into two, smaller groups to discuss the following prompts:

1. Defining a joint outcome (i.e., what is needed to connect this vision to other efforts, a basic SWOT overview, and next steps)
2. Growing the demand (i.e., how to increase visitation in the short- and long-term, and what is needed program-wise)

-----

#### **GROUP ONE – Defining a joint outcome**

This group will identify a list of challenges and opportunities that will be necessary to realize the vision.

Suggested questions include:

- **Connections:** What is missing that **will help connect this vision to active city and regional planning?** Major or planned area attractions?
- **Concerns and barriers to success:** Are there any concerns with the vision? How can those concerns be overcome or addressed? Such as preservation of views, historic character, **accommodating large increase in traffic**, etc.?
- **Opportunities:** What opportunities do you see to move the vision toward realization?
- **Next steps:** What are the major next steps in the short term – **who needs to “endorse” the vision, for example? NPS? Park Board? City? Other public entities?**

Group One distilled notes (“Defining a joint outcome”):

#### Synergy with local comprehensive plans

- Including Cities of Minneapolis, St. Paul, and Hennepin County
- Need to deliver something to planning staff [at each] and bring them to the table
- Need to elevate this project as a priority
- Met Council could be a coordinating body for integration into other plans
- What are the implications of this project for other redevelopment efforts, as well as forthcoming events (i.e. Super Bowl?)

#### Need to be clear about transportation connections to and from the lock and provide updated wayfinding

- Portland Ave. as the main connector between downtown and the waterfront
- Potential for a downtown circulator service (likely bus)
- Piggyback waterfront wayfinding needs with Super Bowl planning, World’s Fair 2023 bid
- Need to assemble a letter to Metro Transit proposing this idea
- Need to consider examples of access from other national park sites, for example Yosemite



### Site accessibility needs

- Site should have a pedestrian focus
- But also consider transportation impacts to the surrounding area
- Could explore a stairway concept(?)
- Need to collaborate with Park Board and Heritage Board regarding accessibility in context of other waterfront developments
- Site will draw additional visitors, so added needs should be reflected in a parking management plan or be integrated into an existing one – the parking management plan for the new US Bank stadium could be a model
- Site must consider how kayakers/canoers portage around the lock
- Site should develop connections to communities beyond downtown, especially communities of color
- Also, a need to explore a phased implementation of the final vision (i.e., some initial improvements to allow public access, later improvements to provide additional access such as the path on the pilings)

### Recreation at the site must be inclusive and interactive

- Recreational opportunities should consider going beyond watercraft and bike/ped to ensure an appeal to people of all backgrounds and levels of ability

### Interpretation at the site must be inclusive

- Need to tell the complete story, not just the one in the dominant culture
- The national park can tell the high-level story of the site's national relevance and importance, but the larger waterfront sites (including the lock and others) need to go deeper
- Interpretation at the site must meet the needs of the national park, but also the surrounding waterfront site
- Recommendation to integrate lock site into a broader interpretive strategy
- Can also connect with the park on the east side on the Xcel site

### Barriers

#### *USACE disposition study*

- If the Corps elects for disposal, it would require a real estate action and the City of Minneapolis may have the first right of refusal (underscoring need to get them on board sooner rather than later)
- The study will need a local sponsor to pursue an additional feasibility study of added visitor amenities at the lock

#### *Governance*

- Need to be clear as to who will be the ultimate owner of the facility assuming a successful project, given the interest of so many groups in the site
- A coalition of entities? If so, there's a need for a "runway" of work
- Fort Snelling could provide a local example of how to do this

## Opportunities

- City of Minneapolis is not involved in the Mississippi River Cities Initiative; missing a chance for funding of projects like this one
- Near-term marketing opportunities, such as those discussed in Group Two, should be explored and implemented

---

## **GROUP TWO – Growing the demand**

This group will identify an agreed-upon set of well-articulated, short term next steps to begin implementing the vision. Suggested questions include:

- **Increase Demand:** What can organizations do to increase interest in the lock as a visitor center and help create awareness and demand? How would that be coordinated and tracked so that we could illustrate increased demand?
- **New Programs:** Are there new services or programs that could be offered in the short term to help drive demand?
- **Connections:** Is there benefit to increasing awareness of the visitor center beyond the immediate vicinity? What would that look like? Who would need to be involved?
- **Future Needs:** What sorts of changes would be necessary with increased marketing, promotion and visibility? What is the capacity if outreach is successful?

Group Two distilled notes (“Growing the demand”):

**At the onset, John put the following questions on the table for discussion:**

### **IN THE SHORT TERM, HOW CAN NPS:**

1. Increase Visibility
2. Increase Visitation
3. And if they are successful at the above, what do we do when we reach capacity at the Lock (what would need to be done to increase capacity if visibility and visitation increases are successful?)

### **SHORT TERM – INCREASING VISIBILITY**

How do people currently know about the Lock and tours?

Lots of “background” from Katie:

- NPS has to be sensitive to Corps rules and security requirements;
- Therefore 3 staff/volunteers are necessary whenever the Lock is open.

### **Marketing currently – all “point of entry”**

All marketing for tours is done on site, getting the word out about the tour to people already nearby. Even with virtually no marketing there were many visitors on the tours:

- Banners and flags outside of Lock
- Farmer’s Market materials
- Volunteers onsite to tell people about tours

Other marketing (all done by Miss Pk Connection), includes:

- Earned media
- Social media
- Email/paper newsletter for park and Miss Park Connection

### **SHORT TERM – INCREASING VISITATION**

Marketing ideas to increase visitation:

- Increase events – offer year round rather than just seasonally
- Offer a menu of options – not just tours
- NatGeo partnership?
- Cross-pollinate with Mill City and other nearby institutions
- Coordinate formally with Meet Minneapolis VC (Nicolet and 5<sup>th</sup>) – put a ranger at that VC, formalize an NPS presence there;
- Cross promote at area restaurants;
- Already 2.1 Million cross the Stone Arch bridge annually – get those people on the Lock;
- Capitalize on neighborhood associations/publications/offer neighborhood groups to meet at Lock;
- Maximize “big events” and get people to Lock – Super Bowl, NCAA Final Four; World’s Fair 2023
- Virtual visiting (InstaMeets, etc.)

### **SHORT TERM – WHAT PHYSICAL IMPROVEMENTS ARE NECESSARY IF VISITATION INCREASES OR REACHES CAPACITY?**

- App or online tour sign-up to handle flow and timing of visitors/tours;
- Lock can handle hundreds more than it currently is getting;
- Potential charge for VC (long term suggestion);

With relatively small financial investment, the Lock could handle increased capacity:

- Create “new spaces” like stairs to Old Upton Island;
- Create path to walk across dam – this improvement could assist with hydro dam advocacy;
- Fencing around mid-portion and south end – to allow people to walk around freely;
- Need new wayfinding system – finding the way into the Lock from other places isn’t easy.

A “World Class” visitor experience: What will make it world class?

- An experience offered nowhere else;
- The Mississippi River itself IS world class – place just needs amenities
- “It’s a National Park – It’s already world class” – needs **branding** as such.





## TRANSFORMING THE LOCK:

*A vision for a new national park visitor experience on the Mississippi River*

### Advisory Team Members (alphabetical by first name)

NAME	AFFILIATION
Amy Spong	State Historic Preservation Office
Andrea Kajer	Minnesota Historical Society
Anita Tabb	Minneapolis Park and Recreation Board
Ben Shardlow	Minneapolis Downtown Council
Brittany Voss	Exponent PR
Cara Letofsky	Metropolitan Council District 8
Carletta Sweet	Downtown Minneapolis Neighborhood Association
Edna Brazaitis	St. Anthony Falls Heritage Board
Elie Farhat	Office of County Commissioner Marion Greene
Greg Swanholm	Office of Senator Amy Klobuchar
Heidi Ritchie	Office of Minneapolis Councilman Jacob Frey
Irene Jones	Friends of the Mississippi River
Jay Cowles	Mississippi Park Connection
Jayne Miller	Minneapolis Park and Recreation Board
Jeff Johnson	Minneapolis Convention Center
John Anfinson	National Park Service
Kathleen Boe	Minneapolis Riverfront Partnership
Katie Nyberg	Mississippi Park Connection
Kjersti Monson	Friends of the Lock and Dam
Laura Salveson	Mill City Museum
Lisa Hondros	St. Anthony Falls Alliance
Liz Wielinski	Minneapolis Park and Recreation Board
Meg Forney	Minneapolis Park and Recreation Board
Michael Rainville	Meet Minneapolis
Nan Bischoff	Army Corps of Engineers
Nicky Leingang	Office of Representative Keith Ellison
Pat Nunnally	River Life, U of M
Paul Reyelts	Friends of the Lock and Dam
Peter Gove	National Parks Conservation Association Council
Peter Wagenius	Office of Minneapolis Mayor Betsy Hodges
Raymond Dehn	State Representative, District 59B
Sara Barrow	Xcel Energy
Tom Evers	Minneapolis Parks Foundation
Win Rockwell	The Great Plains Institute

From: [Bischoff, Nanette M CIV USARMY CEMVP \(USA\)](#)  
To: [REDACTED]  
Date: Tuesday, August 6, 2019 12:56:00 PM

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Good morning. I am responding to your below email.

The October 2018 America's Water Infrastructure Act directed us to expedite the study for the Upper St. Anthony Falls lock, so the study for Lower St. Anthony falls and Lock and Dam 1 has been put on hold. The LSAF and L/D 1 study will begin in approximately December 2020, with public meetings and a comment period in the spring of 2021.

Since your comments are related to the LSAF and L/D 1 study, we'll archive them and include them in the mix when that study begins. Please feel free to re-submit this comment during the LSAF and L/D 1 comment period, in case we lose track of it.

Thank you for taking the time to send us your comments.

Nanette M. Bischoff, P.E.  
Project Manager/FERC Coordinator  
(651) 290-5426

[REDACTED]

I am writing to express support for removing Lower Saint Anthony Falls Lock and Dam and Lock and Dam 1 on the Mississippi River to restore aquatic habitat.

On the Upper Mississippi River, habitat is degrading faster than it can be rehabilitated through existing conservation programs, and the river's dams are a primary cause of declining aquatic habitat. Saint Anthony Falls and its downstream cataract were one of four big river rapids on the Upper Mississippi. Today there exists only a remnant of the Saint Louis Chain of Rocks rapids. Consequently, the aquatic species that needed these big river rapids to complete parts of their lifecycles are under threat, including sturgeon, paddlefish and freshwater mussels—the most endangered group of animals in North America.

The dams in the Mississippi River Gorge were developed to support industrial and shipping activity that no longer exists. While the Gorge's bluffs have been mostly restored to parkland, the river infrastructure remains, limiting public access while the Pool 1 reservoir fills with sediment. Additionally, continuing to operate and maintain this infrastructure costs federal taxpayers millions annually.

Due to the severe impact that these dams are having on the river and the potential to make a major difference for future river sustainability, American Rivers has named the Mississippi River Gorge one of this year's America's Most Endangered Rivers®.

The time is ripe to take a bold step forward towards a new vision of the Gorge that removes the environmentally damaging features of a 150-year-old industrial plan, restores the natural flow and character of the river, rehabilitates habitat for fish and wildlife, and promotes compatible recreation and business opportunities. Please restore the Mississippi River by recommending to Congress that they authorize the removal of the Lower Saint Anthony Falls Lock and Dam and Lock and Dam 1, and call for habitat rehabilitation on the Mississippi River.