

# AFCAC

## Above the Falls Community Advisory Committee

District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
[mplslocksdisposition@usace.army.mil](mailto:mplslocksdisposition@usace.army.mil)

March 9, 2021

Dear Jonathan Sobiech and Nan Bischoff:

The Above the Falls Community Advisory Committee submits this statement in response to the request for public comment regarding the USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft report, first released December 16, 2020, and re-issued January 20, 2021.

The Above the Falls Community Advisory Committee (AFCAC) is an organization made up of representatives from neighborhoods, businesses and environmental organizations, charged with guiding and pro-actively supporting the implementation of the Above the Falls: A Master Plan for the Upper River in Minneapolis. The Above the Falls Master Plan was originally approved in 1999 and updated in 2019, developed by the Minneapolis Park Recreation Board in parallel with a process led by the city of Minneapolis.

From its founding, AFCAC has advocated for equitable public access to the riverfront, ecological restoration of the river and its surrounding land, and thoughtful development that enhances the river's presence in our community.

The Upper St. Anthony Falls Lock is significant to AFCAC in both how it serves the community (by ensuring the Twin Cities' water supply, preventing the spread of invasive species, managing flood risk, and enhancing river recreation) and in how the presence of the lock inhibits public access to a key area of the Minneapolis riverfront.

**AFCAC is strongly opposed to the Army Corps' recommendation of full disposition** of the Upper lock with monetary incentive and we urge the Army Corps to abandon this plan. Full disposition is not in the public interest. The Army Corps is the only acceptable entity to own and maintain the lock in perpetuity. Transfer of lock ownership to a (yet-unidentified) private party would severely limit the public's ability to ensure proper maintenance and operations of the lock.

Should the lock experience any structural or maintenance failures, this could result in a federal emergency. It would endanger the water supply for one million residents, in addition to schools, hospitals, the international airport, and even fire hydrants. We do not have confidence that a private, non-government entity would have the wherewithal to manage and pay for repair and recovery in such a disaster.

Excess land that is not necessary for lock operations, however, should be quickly transferred to the City of Minneapolis or its designee for public use. AFCAC supports the goal of increasing public river access at this site, and this vision has widespread community acceptance. The Corps must not delay this transfer of land to create meaningful public use of this site in line with historic preservation, neighborhood and Congressional goals for the Falls area.

Thank you for the opportunity to comment on the result of the study and express our interest in the future of this site.

Sincerely,

Above the Falls Community Advisory Committee  
Minneapolis, MN

**From:** [Allan Bostelmann](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 10:35:49 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Allan Bostelmann



**From:** [Andrea Andrea](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 6:53:09 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Andrea Andrea



**From:** [Anita Holt](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 11:56:43 AM

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Dear Engineers U.S. Army Corps,


I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. We all know what happens when public domains are handed over to private owners; think the VA and other debacles formerly handled by government entities. However, most importantly, this critical lock serves many essential functions, as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it; and therefore, should continue to own and manage the lock. The Corps' presence is crucial for maintaining the drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Anita Holt



**From:** [Anja Curiskis](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 7:50:54 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Anja Curiskis



**From:** [Aron Rolnitzky](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 5:41:12 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Aron Rolnitzky



**From:** [Barbara Conrad](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 1:20:23 AM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Barbara Conrad



**From:** [Barbara Kane](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 10:08:53 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Barbara Kane



**From:** [Barbara Lunde](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Use the Upper St. Anthony Falls Dam to generate 21 MW of electricity  
**Date:** Wednesday, March 17, 2021 10:02:24 PM

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The Upper St. Anthony Falls Dam should be modified to generate 21 MW of electricity while keeping its functions including regulating the water levels above it.

The February 1984 Corps of Engineers report

<https://apps.dtic.mil/dtic/tr/fulltext/u2/a140262.pdf>

Says it can generate 21 MW with a benefit to cost ratio of 1.65.

The electric generator on Red Rock Dam on the Des Moines River in Iowa was dedicated just months ago. It generates 36 MW of clean electric energy.

Barbara Lunde, PE electrical



**From:** [Benjamin Hocker](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 5:55:49 AM

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Dear Engineers U.S. Army Corps,


I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. In fact, this is on my favorite route for recreational biking, and I pass through here frequently during the fair-weather months. I believe that this lock area must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Benjamin Hocker



**From:** [Bill Walter](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 1:50:43 AM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Bill Walter





2205 California Street #107, Minneapolis, MN 55418 | 612-367-7262 | [bnabottineaneighborhood.org](mailto:bnabottineaneighborhood.org)

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March 12th, 2021

District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
[mplslocksdisposition@usace.army.mil](mailto:mplslocksdisposition@usace.army.mil)

Dear Jonathan Sobiech and Nan Bischoff:

The Bottineau Neighborhood Association (BNA) submits this comment in response to the USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft report, issued January 20, 2021.

The Bottineau neighborhood is located in Northeast Minneapolis, north of the Lock and Dam at St. Anthony Falls, on the bank of the Mississippi River. BNA works to maintain the stability, enhance the social and economic wellbeing, preserve the historical significance, and celebrate the diversity of the Bottineau neighborhood.

We are well acquainted with the Upper Lock, including its closure to commercial navigation, the threat of invasive carp, and stakeholder and non-profit efforts to create a community gathering place on excess property.

It is startling and concerning that the Army Corps seeks to abandon infrastructure of this magnitude and risk improper management of the Lock. With over one million Twin Cities residents, businesses, hospitals and the airport relying on the Mississippi River for water supply, it is crucial that the site is maintained properly in perpetuity.

**We are opposed to the Army Corps' recommendation of Alternative 1a, to fully dispose of the Upper Lock and provide a monetary incentive to the new owner.** The Army Corps should continue to own and maintain the Lock itself; Congress and the Army Corps must acknowledge that water supply *is* a federal interest, not merely a local and regional interest.

**We also urge the Army Corps to expedite WRDA 2020 implementation guidance and convey excess property to the City of Minneapolis or its designee for public use.** This simple conveyance has already been directed by Congress and requires no further study. Do not delay revitalization of this key riverfront site.

Sincerely,  
Mariam Slayhi  
BNA President

**From:** [Bryan Wyberg](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 5:45:57 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Bryan Wyberg

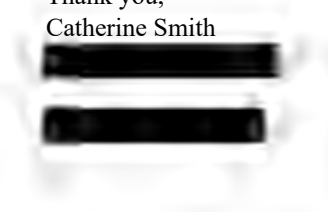


**From:** [Catherine Smith](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Opinion  
**Date:** Tuesday, February 16, 2021 11:15:56 AM

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It seems the community would best be served by having the Minneapolis lock and dam be maintained by the Army Corp of Engineers. The dam is vital for flood mitigation and also to protect the drinking water sources for the Twin Cities area. If a partial sell off of some of the land would provide public areas for people to appreciate the power and beauty of the river, then that would be a good solution too. I disagree with selling the lock to a private enterprise.

Thank you,  
Catherine Smith



**From:** [Cathleen Hauenstein](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 11:08:10 AM

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Dear Engineers U.S. Army Corps,

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Cathleen Hauenstein



**From:** [Charles Petryk](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 3:29:44 AM

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Dear Engineers U.S. Army Corps,


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Regards,  
Charles Petryk

A black rectangular redaction box covering the signature area.

**From:** [Cheryl Evans](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 6:34:58 AM

---

Dear Engineers U.S. Army Corps,

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Additionally, there is renewed focus especially since this pandemic to visit our natural resources. We just need to advertise this one a little more so more people are aware of its awesome beauty!

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

The public access could be used to enhance the number of users of this great beauty!

Regards,  
Cheryl Evans





MHNA  
500 8th Avenue SE  
Minneapolis, MN 55414  
[marcy-holmes.org](http://marcy-holmes.org)  
612.623.7633

March 17, 2021

District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
[mplslocksdisposition@usace.army.mil](mailto:mplslocksdisposition@usace.army.mil)

**Re: Comments of the St. Anthony Falls Alliance Regarding the Upper St. Anthony Falls Lock Disposition Study Draft Report Re-Issued January 20, 2021**

Dear Jonathan Sobiech and Nan Bischoff:

The Marcy-Holmes Neighborhood Association (MHNA) urges the Corps to abandon its stated recommendation to fully dispose of the property and work instead with the City of Minneapolis to ensure partial disposition that will support and enhance goals for improvements intended to make the lock and dam site a vibrant hub connecting people to the Mississippi River.

Marcy-Holmes is the neighborhood at the east end of St. Anthony Falls

MHNA is a charter member of the St. Anthony Falls Alliance (SAFA) and endorses its position and findings in this matter, particularly the importance of connecting people to the Falls.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "John Goebel". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John Goebel  
President, MHNA

**From:** [Christopher Kornmann](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 9:47:51 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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Regards,  
Christopher Kornmann





City of Minneapolis  
350 S. Fifth Street  
Minneapolis, MN 55415

[www.minneapolismn.gov](http://www.minneapolismn.gov)

March 16, 2021

District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101

Dear Jonathan Sobiech and Nan Bischoff:

The City of Minneapolis submits this statement in response to the request for public comment regarding the USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft report, first released December 16, 2020, and re-issued January 20, 2021.

The City of Minneapolis is excited about the future of the Mississippi River including the areas around the Upper St. Anthony Lock. The City documented its vision and intentions regarding the Lock as approved by our City Council through resolution 2018 R-098. The City supports a project which uses ancillary land at the site of the Upper St. Anthony Lock for the development of features like (i) a visitor center, (ii) interpretive, exhibition, and event spaces and (iii) other amenities intended to enhance and preserve the historical, cultural, and recreational value of the Upper St. Anthony Lock and Dam and surrounding area.

The Water Resources Development Act (WRDA) of 2020 sets into law the pathway to fulfill that vision for redevelopment of the Upper St. Anthony Lock with partial disposition of the lock to the City of Minneapolis or its designee. The current Disposition Study proposed by the Army Corps of Engineers is inconsistent with the direction provided by WRDA and threatens to delay this important endeavor. The recommendation for full disposition of the lock would hinder the envisioned development by requiring the identification of an entity willing to own and maintain such a large piece of infrastructure in the Mississippi River.

The Mississippi River is not only a natural wonder running through Minneapolis, it is a highly developed waterway serving our Region and our Nation. The USACE built the lock and dam based on their expertise and national perspective regarding our country's infrastructure. They also built the cutoff wall which is key to the stability of the falls. They are the only entity that can continue to manage these structures with the expertise and oversight that considers its effect on the system of locks, dams, cutoff wall, bridges, flood mitigation, municipal water, industrial uses, transportation, and recreation that impacts millions of Americans. The Federal Government provides the funding necessary to maintain that important national piece of infrastructure in a safe and secure manner keeping both the natural resource of the river and residents that live along its banks safe from natural or other disasters.

The lock is also essential in the fight against invasive carp. The 2014 WRDA Act closed the lock in its use for transportation so that invasive carp would not migrate north into Minnesota's many lakes. The City believes the Corps can best manage this process to ensure that the requirement is upheld and does not fall victim to a lack of oversight.

The Corps should continue to own and maintain the lock at the Upper St. Anthony Falls, reliably supporting water supply, stopping invasive carp migration, managing flood mitigation, and allowing recreation at the site. The Corps should convey the excess land around the Lock to the City of Minneapolis or its designee in accordance with WRDA and move forward in the facilitation of that development as directed by Congress.

The current disposition study delays the opportunity to include this area in the major reclaiming and reimagining of the Mississippi River from an industrial site to a recreational and historical amenity for residents of the region. We hope this can be concluded expeditiously. The City of Minneapolis is looking forward to fulfilling the potential of this site in partnership with the Corps.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'JF', with a stylized flourish at the end.

Jacob Frey  
Minneapolis Mayor

A handwritten signature in black ink, appearing to read 'SF', with a horizontal line extending to the right.

Steve Fletcher  
Ward 3 Council Member

A handwritten signature in black ink, appearing to read 'AJ', with a long, sweeping horizontal line extending to the right.

Andrew Johnson  
Intergovernmental Relations Chair  
Ward 12 Council Member

**From:** [Corinne Segal](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 4:04:47 AM

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Dear Engineers U.S. Army Corps,

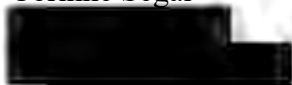
I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Corinne Segal



**From:** [Cynthia Mckeen](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 3:30:00 AM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Cynthia Mckeen



**From:** [Dale Lund](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 2:25:44 PM

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Dear Engineers U.S. Army Corps,

Minnesotans in the know have come to appreciate how a large city can and has created such a wonderful system of parks and other lands for public use. Don't abandon St. Anthony Falls.

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Dale Lund



**From:** [Dave Walter](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 10:10:59 PM

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Dear Engineers U.S. Army Corps,

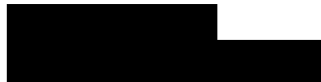
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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Dave Walter



**From:** [Dawn Demaske](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 2:54:29 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Dawn Demaske



**From:** [Debra Hoffman](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 7:15:18 AM

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Dear Engineers U.S. Army Corps,

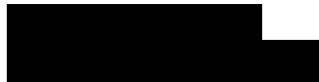
I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property. It is your duty to assure that this site is maintained!

Regards,  
Debra Hoffman



**From:** [Diana Schleisman](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Lock and Dam  
**Date:** Sunday, February 21, 2021 4:34:48 PM

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Hello!

I am a lifelong Minneapolitan. Like many, I love our Mississippi River and am proud that MN houses its headwaters.

While studying at the U of M, I learned about the history of the river and of the original falls. No one can correct the past, but we can all do what we can to make the future better and to make amends in feasible ways.

This land needs to go back to the people. I fear that putting it up for sale will set events in motion that cannot be undone. There's no telling who would buy it and what would happen.

The best case scenario would be for nature to self correct as it has done for millennia. Yet while we are waiting for that to happen, please do not open a door to commercial greed.

I respectfully urge the Army Corps of Engineers to maintain the lock and dam for the time being. If there is an entity that would commit to caring for the land and securing its use for people while honoring the Native spirit then that would be ideal.

I imagine costs are part of the decision. I believe that fundraising efforts would help cover expenses while ensuring the future of this area is not compromised.

I'm certain there are ways to transfer these responsibilities and alleviate the financial burdens by choosing the greatest destiny for this land.

Thank you for your consideration.

Sincerely,

Diana Schleisman  


**From:** [Diane Hofstede](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] RE: Mpls Locks Disposition Study 03 2021 Comments From Great River Coalition, Diane Hofstede  
**Date:** Tuesday, March 16, 2021 1:10:46 AM  
**Attachments:** [image001.png](#)  
[lock\\_dam\\_disposition\\_letter\\_03152021March\\_15.pdf](#)  
**Importance:** High

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March 15, 2021

District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division  
North 180 Fifth Street East  
St. Paul, MN 55101  
[mplslocksdisposition@usace.army.mil](mailto:mplslocksdisposition@usace.army.mil)

Dear Jonathan Sobiech and Nan Bischoff:

*The Great River Coalition* submits this statement in response to the request for public comment regarding the USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft report, first released December 16, 2020, and re-issued January 20, 2021.

**The Great River Coalition are advocates for preserving, protecting, and promoting the historic, commercial, and environmental significance of the Mississippi River, the City of Minneapolis and its relationship to the people and their communities.**

The Great River Coalition's history has supported a comprehensive approach to the Minneapolis riverfront through thoughtful and environmental focused planning of parks, no expansion of commercial districts and dense residential communities near our city's greatest

natural asset – the Mississippi River and the flyover zone that only the Mississippi River provides from Minnesota to the Gulf of Mexico.

Since its inception the Great River Coalition has supported plans by the City of Minneapolis and the Minneapolis Park Board and other entities supporting the environment and the importance of the flyover zone to our migrating birds, insects, and animals. The Great River Coalition supports nature in providing health, clean air and a place to reflect and enjoy nature, as nature, can provide. The Great River Coalition opposes plans to create outdoor entertainment that includes artificial noise and fireworks that has negatively impacted the river

environment with chemicals that pollute the air, water, and environment. The Great River Coalition comments can be seen in the State of Minnesota documents regarding the Mississippi River Critical Area Plan to support the critical nature of the Mississippi River and the historical history cited in our letter.

The Upper Lock at St. Anthony Falls is key to the environmental revitalization of the Minneapolis central riverfront. It will enhance the environmental focus and therefore the livability of neighborhoods both up and down river of St. Anthony West, Nicollet Island, Sheridan, and other neighborhoods that are along the great Mississippi River's borders, and within the Mississippi Watershed critical to our community's history and the history of the underground railroad.

The Falls is an imminently sacred site to the Dakota people and other Indigenous communities. The area has been desecrated from the first days of European settlement and industrialization. Now closed to commercial navigation, the Lock presents an opportunity to return the land as it was an environmental and ecological statement that acknowledges the sacred land and sacred burial grounds on the islands removed from the river. The native peoples cared and sustained the river, provided, and protected the waters, and made them sacred to their lives and their traditions. The focus of our native peoples needs to be acknowledged by maintaining and creating an **environmental oasis** to sustainability, bees and other pollinators. The protection of the watershed by creating the oasis would

acknowledge their importance in the native way of life.

The Great River Coalition requests the following vision be included in this site in adopting the vision statement: “We support the St. Anthony Falls Upper Lock as the centerpiece of an environmental & ecological oasis in Minneapolis”.

We request that the following be added:

- Missing key elements required in regional park plans, including analysis of conflicts with private land owners and cost estimates for land acquisition, operational costs, and clear maps showing inholdings and park boundaries.
- The recommendations be consistent with previously adopted plans.
- Any plans or proposals explains WHY recommendations are being proposed including the analysis completed to support the recommendations. Includes a narrative and documentation showing that the recommendations have validity.
- Need to prioritize directives, funding sources, and initiatives
- Emphasizes the value of natural and historic resources, habitats, wildlife, and our unique riverfront.
- Celebrates the unique natural and historical features of this river corridor, and rebukes a multitude of enterprise activities, or initiatives primarily related to development of new facilities, more hardscape and encouragement of enterprise activities that bring noise, pollution and further desecrates the critical environmental and flyover zone that only the Mississippi River can provide.
- Includes a consistent natural experience along the entire course of the Riverfront.
- The Great River Coalition is opposed to the Army Corps’ recommendation of full disposition of the Upper Lock with monetary incentive.

As a former Minneapolis City Council Member City of Minneapolis records support the critical nature of the riverfront and navigation to the National security of the United States. Clearly the events of January 2021 indicate the

necessity to keep every vehicle to our State and Nation as a means of providing State and National security and public safety.

The Federal Government has owned and operated the Lock. The Federal Government must retain, for national security purposes, the Lock and Dam. In addition, the Lock provides and assumes associated flood mitigation responsibilities, and national security importance. Furthermore, Lock operations and maintenance **should not** be in the hands of a private entity. In times of crises or repair, we do not have confidence that a private, non-government entity would have the wherewithal to manage and pay for repair and recovery.

With over one million Twin Citians relying on the Upper Pool for water supply, including the City of Minneapolis, City of Saint Paul, and other municipalities and the Minneapolis Airport Commission, we cannot leave vital oversight of this important infrastructure to unproven or unknown parties. It would be a regional and federal disaster to lose the St. Anthony Falls reservoir due to a failure of the dam or the cutoff wall that exists under the river – and the Lock is intrinsically tied to the dam.

We respectfully request that Senators Amy Klobuchar and Senator Tina Smith offer legislation to retain the Corps to continue to own and maintain the Lock, reliably supporting water supply, national security, and providing flood mitigation responsibilities.

Thank you for the opportunity to comment on the result of the Study and express our interest in the future of this site. If you have any questions regarding our comments, please contact Great River Coalition President Diane Hofstede, [dianehofstede@bitstream.net](mailto:dianehofstede@bitstream.net), 612 280-1077, or 612-331-6042.

Sincerely,



President Great River Coalition

**From:** [Diane Hofstede](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Cc:** [Phyllis Kahn](#); [Nancy Dehler](#)  
**Subject:** [Non-DoD Source] RE: Mpls Locks Disposition  
**Date:** Tuesday, March 16, 2021 12:58:46 AM  
**Attachments:** [image010.png](#)  
**Importance:** High

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March 15, 2021

District Engineer, St. Paul District, Corps of Engineers

ATTN: Regional Planning and Environmental Division

North

180 Fifth Street East

St. Paul, MN 55101

[mplslocksdisposition@usace.army.mil](mailto:mplslocksdisposition@usace.army.mil)

Dear Jonathan Sobiech and Nan Bischoff:

*The Great River Coalition* submits this statement in response to the request for public comment regarding the USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft report, first released December 16, 2020, and re-issued January 20, 2021.

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Since its inception the Great River Coalition has supported plans by the

City of Minneapolis and the Minneapolis Park Board and other entities supporting the environment and the importance of the flyover zone to our migrating birds, insects, and animals. The Great River Coalition supports nature in providing health, clean air and a place to reflect and enjoy nature, as nature, can provide. The Great River Coalition opposes plans to create outdoor entertainment that includes artificial noise and fireworks that has negatively impacted the river

environment with chemicals that pollute the air, water, and environment. The Great River Coalition comments can be seen in the State of Minnesota documents regarding the Mississippi River Critical Area Plan to support the critical nature of the Mississippi River and the historical history cited in our letter.

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The Great River Coalition requests the following vision be included in this site in adopting the vision statement: "We support the St. Anthony Falls Upper Lock as the centerpiece of an environmental & ecological

oasis in Minneapolis”.

We request that the following be added:

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- Celebrates the unique natural and historical features of this river corridor, and rebukes a multitude of enterprise activities, or initiatives primarily related to development of new facilities, more hardscape and encouragement of enterprise activities that bring noise, pollution and further desecrates the critical environmental and flyover zone that only the Mississippi River can provide.
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As a former Minneapolis City Council Member City of Minneapolis records support the critical nature of the riverfront and navigation to the National security of the United States. Clearly the events of January 2021 indicate the necessity to keep every vehicle to our State and Nation as a means of providing State and National security and public safety.

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responsibilities, and national security importance. Furthermore, Lock operations and maintenance **should not** be in the hands of a private entity. In times of crises or repair, we do not have confidence that a private, non-government entity would have the wherewithal to manage and pay for repair and recovery.

With over one million Twin Citians relying on the Upper Pool for water supply, including the City of Minneapolis, City of Saint Paul, and other municipalities and the Minneapolis Airport Commission, we cannot leave vital oversight of this important infrastructure to unproven or unknown parties. It would be a regional and federal disaster to lose the St. Anthony Falls reservoir due to a failure of the dam or the cutoff wall that exists under the river – and the Lock is intrinsically tied to the dam.

We respectfully request that Senators Amy Klobuchar and Senator Tina Smith offer legislation to retain the Corps to continue to own and maintain the Lock, reliably supporting water supply, national security, and providing flood mitigation responsibilities.

Thank you for the opportunity to comment on the result of the Study and express our interest in the future of this site. If you have any questions regarding our comments, please contact Great River Coalition President Diane Hofstede, [REDACTED]  
[REDACTED]

Sincerely,

President Great River Coalition

Diane Hofstede  
[REDACTED]



40 S. 7<sup>th</sup> Street, STE 212 PMB 172  
Minneapolis, Minnesota 55402  
Phone: (612) 659-1279  
Online: [www.thedmna.org](http://www.thedmna.org)

*The DMNA Land Use Committee works to promote a safe, active, and welcoming public realm; a stable, civically engaged residential neighborhood; and architecturally distinctive urban design.*

March 5, 2021

Mr. Jonathan Sobiech and Ms. Nan Bischoff  
District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
[mplslocksdisposition@usace.army.mil](mailto:mplslocksdisposition@usace.army.mil)

Dear Mr. Sobiech and Ms. Bischoff:

I am writing on behalf of the Downtown Minneapolis Neighborhood Association (DMNA) Board of Directors in response to the USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft report, issued on January 20, 2021. The DMNA represents the interests of people who live, work and own property in the Downtown East and Downtown West neighborhoods in Downtown Minneapolis. Activities and development that take place on the Minneapolis Riverfront are of upmost concern to our constituents.

The DMNA wants to affirm the importance of the federal infrastructure at St. Anthony Falls to our community. We want to voice our strong support for the strategic direction set by federal legislation last year regarding the Upper St. Anthony Falls Lock and Dam, and to express concern for the disconnect between the strategy and recent actions by the St. Paul District of the Army Corps of Engineers.

The DMNA would like the US Army Corps of Engineers to continue owning and maintaining portions of the Upper St. Anthony Falls lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport and other essential entities depend on the Upper lock for its water supply. We are extremely skeptical that there is any other organization with the financial or organizational capacity to manage this critically important facility. If the Corps were to absolve itself of any responsibility for the lock, the threat to our community's basic infrastructure would be catastrophic.

Thank you for the opportunity to respond to the Disposition Study. The DMNA respectfully asks the Army Corp of Engineers to reconsider its recommendation to fully dispose of the Lock. We urge the Army Corps to abandon its proposal for full disposition. Instead, the Corps should expedite the transfer of some land for public access while retaining permanent ownership of the remaining property.

If you have any questions regarding this letter, please feel free to contact me at [christie@thedmna.org](mailto:christie@thedmna.org), or 320-583-4573.

Sincerely,

Christie Rock Hantge  
DMNA Neighborhood Coordinator

CC: Amanda Wigen, Falls Initiative  
Council Member Steve Fletcher  
Council Member Lisa Goodman  
Pam McCrea, DMNA Board Chair  
Kevin Frazell, DMNA Board Liaison to the Land Use Committee  
LB Guthrie, DMNA Land Use Committee Vice Chair

**From:** [Donald Southworth](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 2:22:53 AM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Donald Southworth



**From:** [Don Collier](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 6:33:50 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Don Collier

A black rectangular redaction box covering the signature area.

**From:** [Donna and Jerome Adams](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Jerome Adams public comment upper St. Anthony Falls lock and dam  
**Date:** Thursday, December 17, 2020 7:30:04 AM

---

District Engineer, St. Paul District, Corps of Engineers, ATTN: Regional Planning and Environment Division North,

The federal government constructed the upper St. Anthony Falls lock and dam. The federal government must demolish the upper St. Anthony Falls lock and dam, and replace it with a facility that protects other man made structures and restores the natural flow of the river. Giving the site to local or private entities is not responsible, because they lack the funds and expertise to demolish and construct a facility to replace it.

I fully understand that your report says, "As per Section 1168, dam removal was considered, but was found to be infeasible. As per Sections 1168 and 1225, it was not the objective of the study for the Corps to develop measures to enhance or improve recreation opportunities, the human environment and the natural environment, however, the TSP is conducive to the new owner and outside stakeholders developing the site to accomplish these objectives."

The next paragraph then says, "Successful implementation of the TSP depends on the identification of an entity to take ownership of the project. One purpose of the public review and comment period for the Draft Disposition Study report is to solicit feedback from potentially interested future owners. During the public review period Upper St. Anthony Falls Disposition Report/Environmental Assessment Page vi of this Draft Report, all interested future owners are encouraged to submit a written statement of interest."

The report seems to completely ignore that only the federal government has the funds, resources and expertise to figure out what to do with the structure. I understand that the lock and dam cannot be demolished. However, leaving it as-is leaves the potential future owners with a huge liability in a structure that will continue to deteriorate with repairs that cost millions of dollars. USACE has a responsibility to demolish the lock at least, and build a structure that will last 100 years or more before it turns it over to either a public or private entity.

Sincerely,  
Jerome Adams



**From:** [Donna Butler](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 9:25:47 PM

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Dear Engineers U.S. Army Corps,

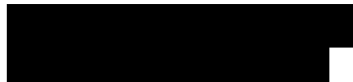
I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Donna Butler





MISSISSIPPI  
WATERSHED  
MANAGEMENT  
ORGANIZATION

2522 Marshall Street NE  
Minneapolis, MN 55418

612-746-4970  
contacts@mwwmo.org

[www.mwwmo.org](http://www.mwwmo.org)

17 March 2021

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

[MplsLocksDisposition@usace.army.mil](mailto:MplsLocksDisposition@usace.army.mil)

MWWMO staff thanks you for the opportunity to provide comments regarding the Tentatively Selected Plan (TSP) is Alternative 1a, Complete Deauthorization and Disposal combined with offering a monetary incentive to the new owner in exchange for expediting the disposal through a direct property transfer. MWWMO staff would like the US Army Corps of Engineers (Corps) to continue owning and maintaining portions of the Upper St. Anthony Falls lock at a minimum until the Lower Saint Anthony Falls will be disposed of by the Corps.

Staff believes the Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the rights-of-way and integrity of the locks and dams at the Falls. The current assessment does not provide enough information regarding how the Corps will ensure the continued protection of water-related resources associated with the operation and maintenance of the USAF following the transfer of property.

MWWMO staff does support transferring the land surrounding the lock, as well as parts of the structure that are not essential to continue lock operations, to another entity for public use. There is community support for increased public use and river access at this site; transferring ownership of unused Corps property can fulfill these local goals while reducing the Corps' ongoing maintenance responsibilities. The disposition of this "excess" land should be completed as quickly as possible.

For these reasons, MWMO staff requests the Corps abandon its proposal for full disposition. Instead, the Corps should expedite the transfer of excess land for public access while retaining ownership of the remaining property until fully describing how continued protection of water-related resources associated with the operation and maintenance of the USAF following the transfer of property will be achieved.

Sincerely,

Douglas Snyder  
Executive Director

**From:** [Edward Neal](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 9:04:54 PM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Edward Neal



**From:** [Elisabeth Wierum](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 9:22:33 AM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

I'm very concerned about drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. Since the Corps build the dam and has the skills necessary to maintain it and keep the integrity in tack I strongly feel the Corps should maintain responsibility for the Upper St Falls Lock. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Elisabeth Wierum



# *Friends of the Riverfront*

P.O. Box 580545, Minneapolis, MN 55458-0545

Tel: 612.579.2662 [ednab@mac.com](mailto:ednab@mac.com)

**Col. Karl Jansen, District Engineer**

**US Army Corps of Engineers, St. Paul Division**

Attn: Regional Planning and Environmental Division North

180 Fifth Street East

St. Paul, MN 55101

[mpsllocksdisposition@usace.army.mil](mailto:mpsllocksdisposition@usace.army.mil)

March 18, 2021

Re: Comments on the Draft Upper St Anthony Falls Lock and Dam Disposition Study

Dear Col. Jansen:

Friends of the Riverfront, a Minnesota non-profit, whose mission is to protect and enhance the natural, historic and cultural resources of the Central Riverfront, appreciates the opportunity to provide the following comments on the Draft Disposition Study.

## **Summary**

As no qualified, responsible party has stepped forward, the Tentatively Selected Alternative (TSA) Full Disposition with Financial Incentive (Alternative 1a) along with its fall-back Full Disposition alternative (Alternative 1), frankly frightens us.

Instead of the TSA, we support a partial disposition of the property to the City of Minneapolis and ask that the Secretary of the Army seek the appropriate authorizations to provide the Corp the necessary funding that will enable it to continue to fulfill its mission at the Lock, including flood control, recreation and water supply. (We surmise this may be the No Action Alternative.)

We also ask the Corp to examine an additional alternative, partial lock removal, that was raised at the March 3, 2021 Public Meeting. Among other unexplored benefits, it may acknowledge and help remediate the desecration of the Falls and Spirit Island, a place of spiritual importance to native people.

## **Discussion**

**No Action Alternative (4.3.3 pg 48)** – While WRDA 2020 seems to complicate the written discussion on the No Action Alternative, this alternative appears to anticipate the Corp continuing

its functions at the Lock with the transfer of the property adjacent to the lock to the City of Minneapolis. If so, this would be the alternative that we would support.

**Alternative 1a (4.3.5, pg 49)** The TSA may have provided an innovative approach for a situation where there was an eager, responsible, qualified party who expressed interest in acquiring the entire property; but, who lacked the financial resources to undertake the long term responsibility associated with the Lock.

However, none of the parties (The City of Minneapolis, Xcel or the Minneapolis Park and Recreation Board) that the Corp identified (6.73, pg 92) as capable of being able to undertake the responsibilities accompanying a full disposition, have indicated any interest in owning the Lock structure. (pg 65)

A cloud overhanging the TSA is that the Lock structure will likely need to be removed some time in the future. Such an undertaking will be complex with unknown; but anticipated huge expenses. The Corp did not provide a calculation for the cost of Lock Removal (4.12, pg 36) stating that it screened it from consideration “because of the large anticipated costs with dam removal and extending the spillway” and its “minimal ecosystem benefits”. Unless this future anticipated expense is calculated and made part of the monetary incentive, sophisticated government entities and other qualified parties would be too cautious to take on such unknown liabilities.

Given that the sophisticated, qualified parties that the Corp has identified have shown no interest in Alternative 1a, our fear is that the only entities who would be interested would possibly be either undercapitalized and naïve about the financial risk or those whose might look to strip the government’s contribution and other assets from their entity with the knowledge that their legal structure would shield them from accountability and financial responsibility. In either case, a financial failure would leave behind a giant concrete “white elephant” without any resources for the continuing maintenance and care that would be needed.

**Alternative 1 (4.3.4, pg 48)** - Full disposition suffers from the same issues as 1a. However, without a financial incentive, this alternative carries an even a bigger risk of an abandoned project.

### **FERC Risks from “non-operational or non-compliant projects”**

To understand how to protect against abandoned projects, FERC has published a notice in the Federal Register on “Financial Assurance Measures for Hydroelectric Projects”.

FERC stated it is seeking input as “Non-operational or non-compliant projects can pose public safety hazards in the event of a dam failure or breach, as demonstrated by the failure of the Edenville and Sanford dams near Midland, Michigan, on May 19, 2020 ... estimates to repair and restore the dams have been more than \$300 million dollars, which does not include the damages that property owners affected by the flooding may have suffered.”

<https://www.federalregister.gov/documents/2021/01/26/2021-01613/financial-assurance-measures-for-hydroelectric-projects>.

The risk described by FERC, in projects where they have oversight and can demand compliance provide evidence that the TSA under which the federal government will relinquish all control, would pose greater risks of abandonment.

## **Dam Failure**

The current and future use of the area by pedestrian park visitors pose risks not considered in the 2016 Risk Assessment (pg 31) which calculated that there would be “no statistical loss of life” from a dam failure. Commenting that there are few houses and commercial buildings in the inundation zone, the study states: “There is a possibility of consequences from people in transit, but these hazards are very low since these people are generally alert and mobile. Any flood wave would remain within the channel since the banks are generally 60 to 100 feet high...”

While it is true that few park visitors will be napping, the risk evaluation appears not to have examined the impact on pedestrians who are the main users of water level riverside features and that the same 60 to 100 feet gorge that the study states would contain any flood, also limits escape routes for pedestrians.

Just to give a couple examples, the area below the falls with a parking area and a flat access road is a popular place for those with limited mobility. People have been observed fishing from wheelchairs and large extended families with children in strollers and elders have been seen taking a slow stroll on the access road. There is a sheer rock wall adjacent to the access road leaving no place to escape a flood wave. Likewise, the pedestrian walkway on the East Bank that is suspended slightly over the water, would trap pedestrians.

**Partial Lock Removal** – Near the end of the March 3rd meeting, a participant raised the possibility of partial lock removal. We believe this alternative should be studied.

Frankly, we hadn’t considered this option. We are aware that the property is considered to be eligible for nomination to the National Register and partial removal may be expensive and difficult.

However, after thinking about the possibility, we believe that it should be seriously explored. There may be many benefits to this alternative, including possibly helping to remediate the desecration of a special spiritual place, including by the building of the Lock and the destruction of what was left of Sprit Island.

The Disposition Study discussed the spiritual nature of the project area to native people (pg 78) and referred to practices such as burial of native people in the project area. We believe that it may be helpful to provide a bit more detail to emphasize the special spiritual importance of this area.

The documented burials at the Falls include significant historical figures and their families such as Chief Babizigindibe (Curly Head) who died around Lake Pepin and was carried to the Falls for his burial. Chief Bagone-giizhig’s (Hole in the Day’s) daughter and his uncle, Wenitgoozhilns (Little Frenchman), were also buried at the Falls. (Anton Treuer, *The Assassination of Hole in the Day*. Footnote 27, pg 235)

The extraordinary spiritual significance of St Anthony Falls to native people was well documented by early explorer Jonathan Carver who traveled to the falls with a Winnebago described as a "prince" and a Frenchman. (*Travels Through the Interior Points of North America in the Years 1766, 1767, and 1768*). Carver’s description of the extraordinary event is as follows:

"The prince had no sooner gained the point that overlooks this wonderful cascade, than he began with an audible voice to address the Great Spirit, one of whose places of residence he imagined this to be. He told him that he had come a long way to pay his adorations to him, and now would make him the best offerings in his power. He accordingly first threw his pipe into the stream; then the roll that contained his tobacco; after these, the bracelets he wore on his arms and wrists; next an ornament that encircled his neck, composed of beads and wires; and at last the ear-rings from his ears; in short, he presented to his god every part of his dress that was valuable; during this he frequently smote his breast with great violence, threw his arms about, and appeared to be much agitated...nor would he leave the place till we smoked together with my pipe in honour of the Great Spirit.

I was greatly surprised at beholding an instance of such elevated devotion in so young an Indian, and instead of ridiculing the ceremonies attending it, as I observed my catholic servant [the Frenchman] tacitly did, I looked on the prince with a greater degree of respect for these sincere proofs he gave of his piety; and I doubt not but that his offerings and prayers were as acceptable to the universal Parent of mankind as if they had been made with greater pomp, or in a consecrated place."

In closing, Friends of the Riverfront wishes to acknowledge its appreciation of the work that Corp staff did to help educate the public about this project. The initial set of public meetings were very informative and Corp staff present had an extraordinary ability to be able to field the most varied questions. Unfortunately, the Pandemic constrained the Corp's ability to deliver the same experience at the March 3rd Zoom meeting where discussion was constrained by the chat feature.

We appreciated the opportunity to provide our comments and hope that they will be helpful to the Corp and be given serious consideration.

Sincerely,



Edna C. Brazaitis

March 16, 2021

**From:** Friends of Pool 2 (non-profit organization)  
**To:** District Engineer, St. Paul District, Corps of Engineers  
**ATTN:** Regional Planning and Environment Division North  
180 Fifth Street East, St. Paul, Minnesota 55101-1638  
**Re:** Disposition Study for Upper St. Anthony Falls Lock & Dam



**Introduction:** The Friends of Pool 2 organization advocates for all Mississippi River users. We represent the interests of more than 1000 recreational and commercial river users, river businesses, marinas, and riverfront property owners. Our members and supporters have raised the following questions, comments and concerns about this study:

1. Upper St. Anthony Falls (USAF) Lock & Dam represents a huge infrastructure investment by U.S. taxpayers. Full disposition of this property would transfer responsibility for the USAF facility from the Federal Government to an unknown private or local government entity. This move could result in an irreversible change in management that may not be in the best long-term interest of taxpayers. We agree with the direction provided by the 2020 WRDA legislation, which is to choose partial disposition. The Corps of Engineers is the most qualified and reliable entity to manage this facility. This study must find a way to continue Federal control of the USAF Lock and Dam (through the U.S.A.C.E.).
2. We know that both politics and climate are fluid. What would happen in the future if the situation at the falls were to shift once more, and the lock were again needed for commercial or recreational navigation? If the facility is still under U.S.A.C.E. management, there will at least be alternatives available. We must not limit our options in any short-sighted way. Or what if the Corps of Engineers' mission at USAF were to shift away from navigation to include recreation and flood control? Flood control typically requires the use of the lock chamber as a spillway during high water events, which are becoming more frequent and longer in duration. The Corps has stated that this function was needed infrequently in the past, however, with climate change and future development upstream, we can reasonably expect such events to become more frequent and severe.
3. The Corps of Engineers has historically been asked to create river infrastructure to save (stabilize) St. Anthony Falls. What entity other than the Corps will be able to ensure the future of the Falls?
4. What guarantees can be put in place to ensure that the Lock and Dam are adequately maintained after disposition, and who will bear that ongoing cost burden?
5. How would disposition of this property affect public safety in the region? Would it potentially damage existing infrastructure and private property, or impact accessibility to the Mississippi River's resources for the diverse population of the community? Monetary costs are only a part of the equation. Lost opportunities are also important considerations.

**Conclusion:** Over the years, our members have seen some ill-advised and myopic policy decisions adversely impact this mighty river. We offer our comments to help avoid more irreversible errors.

The Friends of Pool 2 would enthusiastically support a "partial disposition" option. We believe that protecting the taxpayer's investment means the Corps of Engineers must maintain flexibility both now and in the future. To successfully accomplish that goal, the USAF Lock & Dam facility must remain in the control of the U.S.A.C.E.

Feel free to contact us via our Facebook page, or via email at: [info@FriendsofPool2.org](mailto:info@FriendsofPool2.org). Also, for additional information about Friends of Pool 2, please visit our website at: [www.FriendsofPool2.org](http://www.FriendsofPool2.org).



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**SUBMITTED VIA EMAIL**

Col. Karl Jansen, District Engineer  
US Army Corps of Engineers, St. Paul Division  
Attn: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
mplslocksdisposition@usace.army.mil

March 17, 2021

RE: Upper St. Anthony Falls Lock & Dam Disposition Study draft  
report public comment

Dear Colonel Jansen:

Friends of the Falls (“FOF” or the “Friends”) submits this statement in response to the US Army Corps of Engineers (the “Corps”) Upper St. Anthony Falls Lock and Dam Disposition Study draft report, first released December 16, 2020, then re-issued January 20, 2021 (the “Study”).

***The Friends is firmly opposed to the Corps’ recommendation of Alternative 1a – complete deauthorization and disposal of the Lock with a monetary incentive to the new owner.***

Implementation lead for the Falls Initiative

Friends of the Falls, formerly Friends of the Lock and Dam, was founded in 2016 as a 501c3 public non-profit. Our mission is to transform the Upper Lock (the “Lock”) into a community gathering place, restoring public access to the river.

Our plan to revitalize the Upper Lock and surrounding property, referred to as “the Falls Initiative”, advances numerous adopted plans, including the City of Minneapolis' *Downtown Public Realm Framework* (2016); Minneapolis Park & Recreation Board's *Central Riverfront Regional Parks Master Plan* (2016); Meet Minneapolis' *Destination Transformation 2030* (2017); and the St. Anthony Falls Heritage Board's *Changing Relationships to the Power of the Falls* (2014).<sup>1</sup>

In its launch years, the Friends convened a coalition of stakeholders including the City of Minneapolis (the “City”), Minneapolis Park & Recreation Board, National Park Service, and over two dozen local organizations to consider ways to draw visitors to the Mississippi National River & Recreation Area (“MNRRA”) and contemplate a future for this nationally significant site; MNRRA is a National Park, and Owámniyomni (the Falls) is the only major waterfall on the Mississippi River.<sup>2</sup>

These entities came to acknowledge not only the site's ecological significance and industrial history, but also its cultural heritage as home of the Dakota people. FOF recognized the need to broaden project engagement and put this missing narrative at the forefront.

In 2020, FOF contracted with the Native American Community Development Institute (“NACDI”) to join the project as its community engagement partner. Together, FOF and NACDI are working to build authentic, reciprocal and long-term relationships with First Nations people.

Dakota Tribal leaders, Tribal Historic Preservation Officers and other Indigenous leaders have been invited to participate in a Native Advisory Council to shape the engagement process and create a set of guiding principles to inform future concept designs.

The City has been actively involved with and supportive of our vision for the Lock. The Corps has recognized the City's interest in the future of the Lock, as well as its role as the original development and cost-sharing partner.<sup>3</sup>

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<sup>1</sup> See *Exhibit A* for a list of major plans.

<sup>2</sup> See *Exhibit B* for a list of coalition members.

<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).

By adopting Resolution 2018R-098 on April 13, 2018,<sup>4</sup> the City affirmed its commitment to the development and implementation of the Falls Initiative and directed its staff to work with representatives of FOF, the Corps and other interested parties to examine options to implement the Falls Initiative.

The Friends is considered the implementation lead for the project. In addition to convening stakeholders, we are committed to securing public and private funds to implement a shared community vision for the Upper Lock.

Congressional support for partial disposition, enhanced recreation opportunities at the Lock  
Since the closure of the Upper Lock to commercial navigation in 2015, efforts to revitalize the Lock and surrounding real property have been consistently supported by the United States House of Representatives and United States Senate.

Congress enacted the 2018 Water Resources Development Act, Section 1225, directing the Corps to expedite a study looking exclusively at the Upper Lock and to expand the scope of the study to include consideration of partial disposition.<sup>5</sup>

In January 2019, Senators Klobuchar and Smith sent a letter to the Assistant Secretary of the Army (Civil Works) and the Chief of Engineers/Commanding General stating, “[I]t was our intent that while undertaking the disposition study for the Upper Lock, the Corps would cooperate with the City to develop a plan 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 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.”<sup>6</sup>

The Water Resources Development Act of 2020 (“WRDA 2020”) was signed into law on December 27, 2020. Section 356 directs the Corps to convey real property at the Lock to the City or its designee for public use, “as soon as practicable”. The Corps is to retain property necessary “to continue to operate and maintain the Upper St. Anthony Falls Lock and Dam.”<sup>7</sup>

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<sup>4</sup> See *Exhibit C*.

<sup>5</sup> <https://www.congress.gov/bill/115th-congress/house-bill/8>

<sup>6</sup> See *Exhibit D*.

<sup>7</sup> <https://www.congress.gov/116/bills/hr133/BILLS-116hr133enr.pdf>

This sequence of Congressional direction is clear and consistent: Congress supports partial disposition of the site. There is no evidence, however, suggesting Congress intends to deauthorize the Lock, appropriate funds for an incentive payment to a future owner, or otherwise absolve the Corps of its operations and maintenance responsibilities.

The Corps' position is that its revised draft report accounts for the provisions in WRDA 2020. But in our view, the Corps continues to seek full deauthorization and disposal of the Lock despite the position of Congress. In the process, the Corps is hindering the positive, partial redevelopment of the property and opportunities to offset costs.

A March 1, 2021 letter to Acting Secretary Whitely from Senators Klobuchar and Smith, as well as Representatives Omar, Craig, McCollum and Phillips, leaves no room for misinterpretation: "We write to express significant concern about the decision by the St. Paul District of the Army Corps of Engineers (Corps) to continue to push for full disposal of the Upper St. Anthony Falls Lock and Dam... The Corps is seeking to improperly bundle the entire federal project into one land conveyance despite Federal law requiring the expedited transfer of part of the real property to the City of Minneapolis or its designee. We are frustrated that the St. Paul District has taken this position not only because full disposition is inconsistent with the expedited conveyance in Section 356, but also because it has been advised of Congressional intent in this matter previously."<sup>8</sup>

#### Evaluation of alternatives

In its Study, the Corps specifies four criteria to evaluate and screen alternative plans: Completeness, Effectiveness, Efficiency and Acceptability. We challenge the Corps' evaluation of Alternative 1a in two respects.<sup>9</sup>

**Completeness** is assessed based on the Corps' ability to successfully dispose of the property, including the willingness of an entity to take over the facilities and ease for the government to transfer the facilities.

Alternative 1a should not receive a 'high' rating based on the Corps' own definition of Completeness.

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<sup>8</sup> See *Exhibit E*.

<sup>9</sup> Upper St. Anthony Falls Lock and Dam Draft Integrated Disposition Report and Environmental Assessment (Section 216), U.S. Army Corps of Engineers, St. Paul District, at 69 (revised January 2021).

- We are aware of no non-federal entity willing and able to fully acquire the Lock and assume associated flood mitigation responsibilities.
- Assuming some real property is transferred to the City of Minneapolis or its designee per WRDA 2020, it is unlikely the remaining assets will have significant market value – certainly not enough to offset the cost to operate and maintain the Lock in perpetuity and entice a responsible owner.
- There is no evidence that Congress will approve an incentive payment, deauthorization or disposal to a new owner.

The Corps evaluates **Acceptability** based on whether the plan is acceptable to stakeholders, including the state and federal resource agencies, local governments, non-profit organizations, and the public.<sup>10</sup>

It is absurd the Corps reports that Alternative 1a receives a ‘high’ rating for Acceptability. All indications among stakeholder organizations, those present at the March 3 public meeting, and throughout our community engagement demonstrate that the public unanimously opposes Alternative 1a.

In fact, Corps representatives acknowledged during the public meeting that the Tentatively-Selected Alternative had little public support, but said the Corps does not evaluate alternatives based on what the public likes or doesn’t like. A representative also said that the Corps only considers the perspective of federal stakeholders when weighing alternatives.<sup>11</sup>

Attached as exhibits are letters submitted to the Star Tribune by Friends of the Falls, the National Parks Conservation Association and Friends of the Mississippi River voicing strong stakeholder opposition to Alternative 1a.<sup>12</sup>

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<sup>10</sup> Upper St. Anthony Falls Lock and Dam Draft Integrated Disposition Report and Environmental Assessment (Section 216), U.S. Army Corps of Engineers, St. Paul District, at 69 (revised January 2021).

<sup>11</sup> Video recording, Upper St. Anthony Falls Lock and Dam Disposition Public Meeting, March 3, 2021, <https://www.youtube.com/watch?v=2cgYIASinw0>, at 32:45.

<sup>12</sup> See *Exhibit F and G*.

### Cost-sharing partners, current and future

At the March 3 public meeting, Corps representatives declared that everyone wants them to stay at the Lock, but no one is willing to share in the costs.<sup>13</sup> This is incorrect. Friends of the Falls has secured \$2.8 million from the State of Minnesota for initial enhancements to the site and committed a \$2.5 million match of privately-raised funds.

The National Park Service is also sharing some costs, having assumed visitor management responsibilities at the Lock with its non-profit partner Mississippi Park Connection.

The Corps chose not to recognize these cost-sharing opportunities in its Study, nor did it quantify or account for the economic returns resulting from millions of additional visitors to the Mississippi National River and Recreation Area and central riverfront in its analysis. The Corps is concerned with saving roughly \$7 million over the next 50 years,<sup>14</sup> yet it ignores the \$5.3 million already raised by the Friends for capital improvements and other public investments at the site.

### Federal interest in maintaining the Lock, economic benefit and authorized purpose

The Corps claims that for there to be a federal interest in the Lock, there must be a currently authorized federal mission. This is not the case. The federal interest, as demonstrated by the Corps' detailed economic analysis for the National Economic Development plan, is based on whether there are national economic benefits from the project, whether authorized yet or not.

Given the tourism and interpretive opportunities proposed by Friends of the Falls, the City of Minneapolis and NACDI, the Corps should advise Congress that there is still a federal interest in staying at the Lock. These opportunities - including benefits to National Economic Development - greatly exceed the site's value gained from navigation. State tourism agency Explore Minnesota has recognized the Falls Initiative's capacity to drive tourism and precipitate economic benefit.<sup>15</sup>

Regarding authorized purpose, we advise that the Corps abandons its ongoing campaign for full deauthorization. The dams at St. Anthony Falls, both above and below the surface, preserve the Falls and prevent the upstream erosion that would occur if the dams failed. Such a failure

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<sup>13</sup> Video recording, Upper St. Anthony Falls Lock and Dam Disposition Public Meeting, March 3, 2021, <https://www.youtube.com/watch?v=2cgYIASinw0>, at 1:03:20.

<sup>14</sup> Upper St. Anthony Falls Lock and Dam Draft Integrated Disposition Report and Environmental Assessment (Section 216), U.S. Army Corps of Engineers, St. Paul District, at 65 (revised January 2021).

<sup>15</sup> See *Exhibit H*.

would cause massive amounts of sediment to flow into Pool 2. The Corps recognizes this would increase dredging costs for decades and cost millions of dollars.

There is also precedent for the Corps to secure and apply significant funding toward projects that have a standing, but inactive, navigation mission. The navigation need for the Mississippi River Headwaters Reservoirs ended in 1940, yet its navigation mission still stands.<sup>16</sup>

We encourage the Corps to analyze the appropriation of funding at the Headwaters and other comparable sites. The Corps should include that funding analysis in its Study and make recommendations of any new appropriations necessary for the District to support ongoing operations and maintenance of the site, which is the outcome directed by Congress. We struggle to understand how the Study could be considered ‘complete’ without full analysis of the outcome directed by Congress in WRDA 2020, including recommendations for new appropriations.

The Corps suggests, in its Study and the March 3 public meeting, that maintaining adequate water supply, flood risk mitigation and protecting the Upper Mississippi from invasive species are issues not in the federal interest; they do not merit the Corps remaining at the Lock.<sup>17</sup> We are concerned a federal entity would maintain this viewpoint. The Lock must be viewed as one piece in a larger system. Successful operation of the Lock ensures water supply, flood mitigation, transportation and recreation opportunities for millions of Americans. The Corps must continue to offer the funding, expertise and oversight necessary to safely manage this infrastructure and prevent disaster at a national scale.

#### On conveyance of excess property

On one point the Friends is aligned with the Corps: We agree that real property surrounding the Upper Lock can be conveyed to the City of Minneapolis or its designee, per WRDA 2020, concurrent with the rest of the disposition study.<sup>18</sup> The Corps cannot hold revitalization of this site hostage by improperly bundling the entire federal project into one land conveyance.

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<sup>16</sup> Video recording, Upper St. Anthony Falls Lock and Dam Disposition Public Meeting, March 3, 2021, <https://www.youtube.com/watch?v=2cgYIASinw0>, at 1:07:45.

<sup>17</sup> Video recording, Upper St. Anthony Falls Lock and Dam Disposition Public Meeting, March 3, 2021, <https://www.youtube.com/watch?v=2cgYIASinw0>, at 46:40.

<sup>18</sup> Video recording, Upper St. Anthony Falls Lock and Dam Disposition Public Meeting, March 3, 2021, <https://www.youtube.com/watch?v=2cgYIASinw0>, at 54:10.

We join Senator Klobuchar, Senator Smith and members of Congress, though, in urging the Corps to “collaborate closely with the City of Minneapolis on a timeline to expedite the partial disposition and conveyance of the property...within the next year.”<sup>19</sup> To do so, the Mississippi Valley Division must expedite its implementation guidance.

We also urge the Corps disposition study and environmental review to include the Section 106 National Historic Preservation Act coordination and analysis, and recognize that no matter which alternative is selected, the real property at the Upper St. Anthony Falls may be disposed of to different parties over the course of several years. By recognizing that a complete disposition is unlikely at one time, the Corps will be in a position to comply with the expedited partial disposition of the real property, as required by WRDA 2020. This incremental disposition approach is also consistent with the approach the Army routinely uses to dispose of real property in compliance with a decision by a Base Closure and Realignment Commission.

The City is aligned with Friends of the Falls on the objective of partial conveyance to the City, and the parties are working in concert to advance that objective with the Corps of Engineers.

The Corps must also immediately address seepage and other observable issues at the Upper Lock. Despite current Congressional direction to maintain the structure, the Corps has not funded basic maintenance, and the structure has fallen into a state of disrepair. The Corps confirmed at its March 3 public meeting that it intends to dispose of the property in “as is” condition.<sup>20</sup> This proposal is utterly unacceptable; the Corps must identify funds to repair the property and make it safe for visitors prior to conveyance.

#### Proposed course of action, modified alternative

We provide these comments in an effort to ensure the Corps will maintain its role at the Upper Lock. Not only do we believe the Corps has the appropriate expertise to own and manage public infrastructure of this magnitude, but we believe the Corps is the right partner to operate beside the Friends, the City of Minneapolis and Indigenous partners as we work to create a community gathering place at the Falls.

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<sup>19</sup> See *Exhibit E*.

<sup>20</sup> Video recording, Upper St. Anthony Falls Lock and Dam Disposition Public Meeting, March 3, 2021, <https://www.youtube.com/watch?v=2cgYIASinw0>, at 38:15.

***The Corps should continue to own and maintain all property required for flood mitigation and all remaining property that the City or its designee does not take. The Corps should stop seeking deauthorization of its navigation mission and look for opportunities to bolster and prioritize its recreation mission.***

This modified alternative would meet the Study's planning objectives and receive appropriately 'high' ratings for Completeness, Effectiveness, Efficiency and Acceptability. The National Economic Development analysis, when taking into account the remaining navigation function and recreational benefit, would demonstrate a substantial positive benefit cost ratio and critical federal interests. Though all costs to the Corps would not be eliminated, multiple partners, including the Friends, will share costs and provide access to new funding sources.

In closing

Thank you for the opportunity to comment on the draft disposition study and express our interest in the future of the Upper St. Anthony Falls Lock & Dam.

We urge the Army Corps to quickly convey excess property to the City of Minneapolis or its designee for public use, and to recommend a modified alternative to Congress in lieu of its current proposal.

We intend to work collaboratively with the Corps to revitalize the Upper Lock and fulfill the community's vision for the central riverfront.

Sincerely,



**Mark Andrew**

President, Friends of the Falls  
612-306-5063



**Kjersti Duval**

Project Director, Friends of the Falls  
612-836-8266

cc: Jeff Johnson, City of Minneapolis  
Paul Reyelts, Chair of the Board, Friends of the Falls  
Mark Wilson, Vice Chair of the Board, Friends of the Falls

## Exhibit A

1. *Upper Mississippi River Basin Commission, Water and Land: Future Perspectives and Plans. April 25, 1978.*<sup>1</sup> The Upper Mississippi River Basin Commission's Water and Land: Future Perspectives and Plans deals directly with the Minneapolis metropolitan area and discusses many aspects of the urban Mississippi river, including outdoor recreation and hydroelectric generation. Prepared by the State of Minnesota, the United States Department of Agriculture, the Corps, the United States Department of the Interior, the United States Environmental Protection Agency, and the United States Department of Housing and Urban Development, it describes all standards, data, and methodology for the study of water and land use.

2. *U. S. Fish and Wildlife Service. Canadian Wildlife Service. 1986. North American Waterfowl Management Plan. Department of the Interior. Environment Canada. May 1986.*<sup>2</sup>

3. *Minnesota Department of Natural Resources. Undated. Minnesota Department of Natural Resources Canoe and Boating Route Program. St. Paul, Minnesota. 39 Pamphlets.*<sup>3</sup>

4. *Mississippi National River and Recreation Area, Comprehensive Management Plan (1995).*<sup>4</sup> Congress established the Mississippi National River and Recreation Area (the "MNRRA") in 1988 and charged the Secretary of the Interior with coordinating efforts to enhance the 72-mile section of the Mississippi River corridor. The St. Anthony Falls are invaluable portion of the MNRRA and represent a nationally significant historical, recreational, scenic, cultural, natural, economic and scientific resource.

5. *Mississippi National River and Recreation Area, Strategic Plan (2008-2012).*<sup>5</sup> This plan provides strategic goals for heightening the visibility and the position of the Mississippi River for enjoyment, recreation, and education.

6. *Minneapolis Park and Recreation Board, Central Mississippi Riverfront Regional Park Master Plan (2015).*<sup>6</sup> This plan provides the regional park boundary, which encompasses the St. Anthony Falls.

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<sup>1</sup> Upper Mississippi River Basin Commission, Water and Land: Future Perspectives and Plans (Accession No. 20090207-1214) (April 25, 1978).

<sup>2</sup> See Federal Energy Regulatory Commission, Office of Energy Projects, List of Comprehensive Plans, at 50 (Oct. 2016); Department of the Interior, Environment Canada, North American Waterfowl Management Plan, at 10 (1986), <https://www.fws.gov/migratorybirds/pdf/management/NAWMP/OriginalNAWMP.pdf>.

<sup>3</sup> See Federal Energy Regulatory Commission, Office of Energy Projects, List of Comprehensive Plans, at 49 (Oct. 2016).

<sup>4</sup> Dep't of the Interior, Mississippi River Coordinating Commission and National Park Service, Comprehensive Management Plan: Mississippi River and Recreation Area (1995), <https://www.nps.gov/miss/learn/management/loader.cfm?csModule=security/getfile&PageID=3202395>.

<sup>5</sup> Mississippi National River and Recreation Area, Strategic Plan (2008-2012), <https://www.nps.gov/miss/learn/management/upload/MNRRA-StrategicPlanfinal.doc>.

<sup>6</sup> Minneapolis Park and Recreation Board, Central Mississippi Riverfront Regional Park Master Plan (2015), [https://www.minneapolisparks.org/\\_asset/d6kv9t/central\\_riverfront\\_masterplan\\_approved.pdf](https://www.minneapolisparks.org/_asset/d6kv9t/central_riverfront_masterplan_approved.pdf).

7. *Metropolitan Council, Regional Parks Policy Plan 2030 (June 12, 2013).*<sup>7</sup> This plan discusses the Regional Parks system and provides regional park expansion plans through 2030.

8. *The St. Anthony Falls Heritage Board, The St. Anthony Falls Interpretive Plan (2009).*<sup>8</sup> This Interpretive Plan provides guidance for the preservation and interpretation of historic features on the Minneapolis riverfront.

9. *The St. Anthony Falls Heritage Board, Changing Relationships to the Power of the Falls: An Interpretive Vision for the West Bank of St. Anthony Falls (2014).*<sup>9</sup> This visioning document advances the work of the organization's 2009 Interpretive Plan. A similar plan was released in 2013 relating to the East Bank.

10. *City of Minneapolis, Historic Mills District Master Plan, (Published in 1988, update released in 2001).*<sup>10</sup> This plan provides the urban design plan and standards for the Historic Mill District, the neighborhood that abuts the site for the Falls Initiative.

11. *City of Minneapolis, The Minneapolis Plan for Sustainable Growth, Chapter Seven: Open Space and Parks (2009).*<sup>11</sup> This plan provides maps of existing parks that are centered around or near the proposed Falls Initiative, including regional parks, regional trails, open spaces in the City, and proposed park and trail facilities.

12. *City of Minneapolis, Downtown: Public Realm Framework Plan (2016).*<sup>12</sup> This plan outlines the City's objective for coordinating public and private works in the downtown area.

13. *Meet Minneapolis, Destination Transformation 2030 (2017).*<sup>13</sup> The non-profit Meet Minneapolis and City of Minneapolis jointly released the city's first tourism master plan. The plan identifies eight initiatives for 2030.

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<sup>7</sup> Metropolitan Council, Regional Parks Policy Plan 2030 (June 12, 2013), <https://metro council.org/Parks/Publications-And-Resources/POLICY-PLANS/ParksPolicyPlanJuly2012-pdf.aspx>.

<sup>8</sup> The St. Anthony Falls Heritage Board, The St. Anthony Falls Interpretive Plan (2009), [http://www.mnhs.org/places/safhb/about\\_plan.php](http://www.mnhs.org/places/safhb/about_plan.php).

<sup>9</sup> The St. Anthony Falls Heritage Board, Changing Relationships to the Power of the Falls: An Interpretive Vision for the West Bank of St. Anthony Falls (2014), [https://www.mnhs.org/places/safhb/pdf/West\\_Bank\\_Vision.pdf](https://www.mnhs.org/places/safhb/pdf/West_Bank_Vision.pdf).

<sup>10</sup> City of Minneapolis, Historic Mills District Master Plan (Published in 1988, update released in 2001), available at [http://www.ci.minneapolis.mn.us/cped/planning/cped\\_update\\_historic\\_mills](http://www.ci.minneapolis.mn.us/cped/planning/cped_update_historic_mills).

<sup>11</sup> City of Minneapolis, The Minneapolis Plan for Sustainable Growth, at Chapter Seven: Open Space and Parks (2009), [http://www.minneapolismn.gov/www/groups/public/@cped/documents/webcontent/convert\\_286387.pdf](http://www.minneapolismn.gov/www/groups/public/@cped/documents/webcontent/convert_286387.pdf).

<sup>12</sup> City of Minneapolis, Downtown: Public Realm Framework Plan (2016), <http://www.minneapolismn.gov/www/groups/public/@cped/documents/webcontent/wcmssp-180843.pdf>.

<sup>13</sup> Meet Minneapolis, Destination Transformation 2030 (2017), <https://www.minneapolis.org/about-us/destination-transformation-2030/>.

14. *Mississippi National River and Recreation Area, Alternative Transportation Plan (2011)*.<sup>14</sup> This plan discusses, among other things, the plan for a continuous trail along the Mississippi River in the Twin Cities metro area.

15. *Minnesota Parks and Trails Legacy Plan: Parks and Trails of State and Regional Significance, A 25-Year Long-Range Plan for Minnesota (2011)*.<sup>15</sup> This plan makes trail development and land acquisition within a park or trail boundary a high-priority.

16. *The Minneapolis Downtown Council, Intersections: Downtown 2025 Plan (2011)*.<sup>16</sup> This plan calls for enhancing and emphasizing the Minneapolis central riverfront as the City's "green focal point" through collaborative efforts between the business sector, the Minneapolis Park and Recreation Board, and other partners.

17. *City of Minneapolis, Critical Area Plan (2006)*.<sup>17</sup> This plan identifies critical resources in the City's river corridor, including the Stone Arch Bridge and the St. Anthony Falls Lock and Dam.

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<sup>14</sup> Mississippi National River and Recreation Area, Alternative Transportation Plan (2011), [https://www.nps.gov/miss/learn/news/upload/FINAL-Transportation-Implementation-Plan\\_02-01-11-2.pdf](https://www.nps.gov/miss/learn/news/upload/FINAL-Transportation-Implementation-Plan_02-01-11-2.pdf).

<sup>15</sup> Minnesota Parks and Trails Legacy Plan: Parks and Trails of State and Regional Significance, A 25-Year Long-Range Plan for Minnesota (2011), [http://www.legacy.leg.mn/sites/default/files/resources/parks\\_trails\\_legacy\\_plan\\_0.pdf](http://www.legacy.leg.mn/sites/default/files/resources/parks_trails_legacy_plan_0.pdf).

<sup>16</sup> The Minneapolis Downtown Council, Intersections: Downtown 2025 Plan (2011), generally and at 74 [http://assets.ngin.com/attachments/document/0023/6032/10377\\_PlanBook\\_forWeb\\_opti-1.pdf](http://assets.ngin.com/attachments/document/0023/6032/10377_PlanBook_forWeb_opti-1.pdf).

<sup>17</sup> City of Minneapolis, Critical Area Plan (2006), [http://www.minneapolismn.gov/www/groups/public/@cped/documents/webcontent/convert\\_265379.pdf](http://www.minneapolismn.gov/www/groups/public/@cped/documents/webcontent/convert_265379.pdf).

## Exhibit B

In its launch years, Friends of the Falls convened a coalition of stakeholders from over two dozen local organizations. Many took formal action to endorse the coalition statement:

*“We support the St. Anthony Falls Upper Lock as the centerpiece of an iconic civic and cultural destination, reflective of our shared history, for the use and enjoyment of all.”*

Supporting entities include:



## **Exhibit C**

(Document attached)



Resolution No. 2018R-098

City of Minneapolis

File No. 2018-00319

Author: Johnson

Committee: EDRS, IGR

Public Hearing: None

Passage: Apr 13, 2018

Publication: APR 21 2018

RECORD OF COUNCIL VOTE				
COUNCIL MEMBER	AYE	NAY	ABSTAIN	ABSENT
Bender	X			
Jenkins				X
Johnson	X			
Gordon	X			
Reich				X
Fletcher	X			
Cunningham				X
Ellison				X
Warsame	X			
Goodman	X			
Cano	X			
Schroeder	X			
Palmisano	X			

## MAYOR ACTION

☒ APPROVED☐ VETOED

MAYOR

APR 17 2018

DATE

Certified an official action of the City Council

ATTEST

CITY CLERK

Presented to Mayor: APR 13 2018

Received from Mayor: APR 17 2018

Approving the redevelopment plan of the Upper St. Anthony Falls Lock and Dam and the surrounding area ("The Falls"), as well as the prohibition of development of any hydroelectric generating facilities on the Upper St. Anthony Falls Lock and Dam, and the proposed principles and objectives for federal legislation.

Whereas, in 2014, the U.S. Army Corps of Engineers (the "USACE") was directed by an Act of the United States Congress to close the Upper St. Anthony Falls Lock and Dam to navigation by Section 2010 of the Water Resources Reform and Development Act of 2014; and, on June 9, 2015, it was closed to navigation; and

Whereas, in October, 2015, the USACE announced its intent to begin a disposition study for the Upper St. Anthony Falls Lock and Dam pursuant to Section 216 of the Flood Control Act of 1970 (84 Stat. 1830); and

Whereas, the Upper St. Anthony Falls Lock and Dam continues to be used for flood risk management, public tours, and as a launching point for emergency water rescues; and

Whereas, the Upper St. Anthony Falls Lock and Dam is a unit of Mississippi National River and Recreation Area ("MNRRA"), which was established by Congress in an act of November 18, 1988 and identified as a nationally significant historical, recreational, scenic, cultural, natural, economic and scientific resource (16 U.S.C. 460zz et. seq.); and

Whereas, Friends of the Lock and Dam, a nonprofit with 501c3 status, in cooperation with other local stakeholders and community partners, has developed a vision for the Upper St. Anthony Falls Lock and Dam as described in "The Falls: St. Anthony Falls Lock and Dam Park and Visitor Center" ("The Falls") which is responsive to decades of public planning consistently recommending the creation of an iconic visitor center and attraction at St. Anthony Falls; and

Whereas, The Falls redevelopment vision is entirely congruent with the recommendations and adopted plans of the City and other key stakeholder entities, including the City's recent *Destination Transformation 2030* plan; the Minneapolis Park and Recreation Board's *Central Mississippi Riverfront Regional Park Master Plan*; the Downtown Council's *Intersections: Downtown 2025* plan; the National Parks Conservation Association's *Transforming the Lock* plan; and the St. Anthony Falls Heritage Board's *Changing Relationships to the Power of the Falls – West Bank* plan, as well as numerous other long range plans for the area; and

Whereas, Friends of the Lock and Dam is working with a broad coalition of interested parties to advance legislation for inclusion in the next Water Resources Development Act ("WRDA") bill to further The Falls initiative and support the outcomes described in the other adopted plans described herein; and

Whereas, the City of Minneapolis is seeking \$1.5 million of state bonds for predesign and design of the Upper St. Anthony Falls redevelopment, and Friends of the Lock and Dam have committed to matching bonding funds 2 to 1 (\$3 million private funds) for predesign, and design of The Falls; and Friends of the Lock and Dam has already raised \$5 million in private contributions to support these efforts; and

Whereas, the City Council has previously directed Intergovernmental Relations, Community Planning & Economic Development, City Attorney and Public Works staff to work with representatives of Friends of the Lock and Dam, USACE, Minneapolis Park and Recreation Board, and other interested parties to examine options for the future of the Upper St. Anthony Falls Lock, including examining different ownership and operational structures that could meet the state constitutional and statutory requirements for the receipt of state bond funds and other public financing support; and

Now, Therefore, Be It Resolved by The City Council of The City of Minneapolis:

That the City Council recognizes the Upper St. Anthony Falls Lock and Dam and surrounding area as a nationally significant historical, recreational, scenic, cultural, natural, economic and scientific resource.

Be It Further Resolved that the City Council approves and supports the implementation of The Falls initiative, and reaffirms its direction to staff to work with representatives of Friends of the Lock and Dam, USACE and other interested parties to examine options to implement The Falls initiative.

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.

Be It Further Resolved that the City Council supports and commits the City to work toward outcomes described in principle for WRDA legislation attached hereto as Exhibit A, contained in Legislative File No. 2018-00319 in the Office of the City Clerk.

**Exhibit D**

(Document attached)

# United States Senate

WASHINGTON, DC 20510

January 8, 2019

Mr. R.D. James  
Assistant Secretary of the Army (Civil Works)  
108 Army Pentagon  
Washington, DC 22202

Lieutenant General Todd T. Semonite  
Chief of Engineers/Commanding General  
441 G Street, NW  
Washington, DC 20314

Dear Mr. James and Lt. Gen. Semonite:

We write to you to clarify Congressional intent with respect to Section 1225 of the America's Water Infrastructure Act of 2018, which became law on October 23, 2018. The provision directs the Army Corps of Engineers to expedite completion of a study and report on the feasibility of certain modifications in carrying out the disposition of the Upper St. Anthony Falls Lock and Dam (Upper Lock).

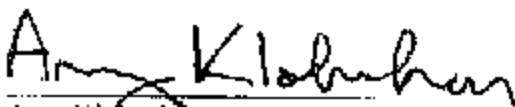
After the Upper Lock was closed to navigation on June 9, 2015, the City of Minneapolis began exploring plans to develop a visitor center and recreational destination at the landmark site. The Minneapolis City Council passed a resolution in support of implementing this plan in coordination with the Friends of the Lock and Dam. This project is supported by a broad coalition of public, non-governmental, and non-profit organizations in order to preserve the area as a historical, recreational, scenic, cultural, economic, and scientific resource.

For this reason, it was our intent in this legislation for the Corps to undertake a disposition study solely for the Upper Lock under Section 216 of the Flood Control Act of 1970. It was also our intent that the disposition study for the Upper Lock be conducted separately from the disposition study for the Lower St. Anthony Falls Lock and Dam and Lock and Dam 1, to allow the Upper Lock's disposition to proceed on an expedited basis.

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 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.

Thank you for your work to implement the America's Water Infrastructure Act of 2018. We look forward to working with you to expedite the disposition study for the Upper Lock consistent with Section 1225 of the law.

Sincerely,



Amy Klobuchar  
United States Senator



Tina Smith  
United States Senator

**Exhibit E**

(Document attached)

Congress of the United States  
Washington, DC 20515

March 1, 2021

The Honorable John Whitley  
Acting Secretary of the Army  
108 Army Pentagon  
Washington, D.C. 22202

Dear Acting Secretary Whitley:

We write to express significant concern about the decision by the St. Paul District of the Army Corps of Engineers (Corps) to continue to push for full disposal of the Upper St. Anthony Falls Lock and Dam. We urge you to collaborate closely with the City of Minneapolis on a timeline and process which will facilitate the partial disposition and conveyance of the property at the Upper Lock, as directed in Section 356 of the Water Resources Development Act (WRDA) of 2020, within the next year.

On January 7, 2021, the Corps issued a public statement accompanying the release of the draft disposition study for the Upper St. Anthony Falls Lock and Dam which states in part that *“WRDA 2020 does not change the Corps’ recommendation for complete disposal of the federal project at Upper St. Anthony Falls nor its obligation to complete the disposition study.”*

Section 356 of WRDA 2020 – which was signed into law on December 27, 2020 - requires the Secretary of the Army to convey the real property at the Upper St. Anthony Falls Lock and Dam to the City of Minneapolis, Minnesota, or its designee “as soon as practicable.” The same section envisions the Corps continuing to operate and maintain the Upper St. Anthony Falls lock under its existing authority.

The Corps is seeking to improperly bundle the entire federal project into one land conveyance despite Federal law requiring the expedited transfer of part of the real property to the City of Minneapolis or its designee. We are frustrated that the St. Paul District has taken this position not only because full disposition is inconsistent with the expedited conveyance in Section 356, but also because it has been advised of Congressional intent in this matter previously.

A January 8, 2019, letter to the Corps from Senators Klobuchar and Smith stated the expectation that, *“the Corps would cooperate with the City of Minneapolis to develop a plan in which the Corps would continue to own, operate and maintain the Upper Lock for flood control and water supply management and divest to the City a portion of the real property surrounding the Upper Lock.”* Our commitment to this goal is unchanged.

The draft disposition study has already identified all the components of the Upper St. Anthony Falls Lock and Dam which are compatible for a partial disposition, making expedited conveyance possible. We urge the Corps to collaborate closely with the City of Minneapolis on a timeline and process which will facilitate the partial disposal and conveyance of the property at the Upper Lock within the next year, consistent with Section 356.

We look forward to a prompt response, and expeditious transfer of the identified real property.

Sincerely,



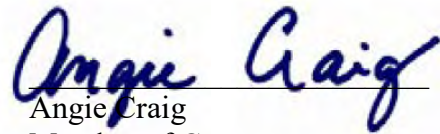
Amy Klobuchar  
United States Senator



Tina Smith  
United States Senator



Ilhan Omar  
Member of Congress



Angie Craig  
Member of Congress



Betty McCollum  
Member of Congress



Dean Phillips  
Member of Congress

## Exhibit F

### Letters to the Editor, Star Tribune

<https://www.startribune.com/readers-write-jury-trials-upper-st-anthony-falls-lock-and-dam-covid-vaccinations/600032706/>

LETTERS

## Readers Write: Jury trials, Upper St. Anthony Falls Lock and Dam, COVID vaccinations

An essential tool of justice.

edition 10/20/21 - 1/11/24



### UPPER ST. ANTHONY FALLS

#### Another factor: Adjacent land

So the Army Corps of Engineers wishes to abandon the lock at St. Anthony Falls so someone else can manage the city's water supply, prevent flooding and maintain the lock in perpetuity? ("No takers are found for Mpls. lock, dam," March 9.) Even though this action is in clear violation of federal directives? And no qualified entity exists?

Lost in the conversation about the Corps' baffling effort to abandon the lock and dam is a critical question: Should the federal government be allowed to let the Upper Lock decay at a key location on our city's riverfront, or should the Corps cooperate with the community and dispose of a few unwanted acres adjacent to the lock so it can be repurposed for public use?

It is mind-boggling that it has taken six years, multiple federal laws and unanimous pressure from involved Minnesota members of Congress to advance the simple conveyance of a site the size of a postage stamp.

Many have weighed in on the value of repurposing the Upper Lock, with ideas like a Native American interpretive center, a marina, green space, walking trails, a visitor center and space for meditation.

The Army Corps' intent to find a new owner and walk away from the lock — without first conveying this adjacent real estate — would guarantee this unique river site lies fallow for many years.

Friends of the Falls, the Native American Community Development Institute, justice advocates and the general public await an outcome that protects the public interest and empowers the community to determine the best future of this site.

**Mark Andrew, Minneapolis**

*The writer is president of Friends of the Falls.*

...

Contrary to a recent article, the Upper St. Anthony Falls Lock is open for business and a vital hub of activity.

Since the lock was closed in 2015, the U.S. Army Corps of Engineers no longer serves navigation at the site; however, National Park Service rangers at Mississippi National River and Recreation Area have given hundreds of public tours there. Visitors can experience the only major waterfall on the Mississippi from an observation deck while learning about the history of our nation's iconic river. And these tours are popular. Once the park service opened the doors to the public, there was an immediate tenfold increase in visitors.

People clearly want to experience the river. Yet the Corps wants to walk away and is not even funding upkeep in the process. The lock is still critical to the water supply for nearly a million people and local flood control mitigation. Letting this building deteriorate while it tries to find a new owner jeopardizes safety and public enjoyment of the river.

And there is no other viable owner. The Corps built the structure and has the expertise and budget to maintain it, so should continue that responsibility.

The Corps must stay as a valued community partner, and Congress should support it by expanding its role at the lock to protect the region's water supply and ensure continued recreational opportunities for all.

**Christine Goepferl, St. Paul**

*The writer is associate director at the National Parks Conservation Association.*



## Exhibit G

### Letter to the Editor, Star Tribune

<https://www.startribune.com/readers-write-drinking-water-from-the-mississippi-river-speed-limits-the-benefits-of-jury-trials/600032271/>

LETTER

## Readers Write: Drinking water from the Mississippi River, speed limits, the benefits of jury trials

Don't gamble with our water supply.

MARCH 11 (G) 11:00AM



The Upper St. Anthony Falls Lock and Dam in Minneapolis.

I'm deeply concerned about the Army Corps of Engineers' plan to divest itself of responsibility for the Upper St. Anthony Falls lock. (No takers are found for Mpls. lock, dam,\* March 9). The lock maintains upstream water levels that ensure sufficient drinking water for nearly 1 million Twin Cities metro residents.

Minneapolis leaders have made it clear that the city doesn't want to own the lock. There's a real risk that a private owner, not accountable to the public, might pursue ownership.

Should a new owner's negligence cause the lock to fail, damage to our water supply could be felt within days. Homes, hospitals, schools, airports and even fire hydrants could be without water. Our government leaders would scramble to respond, but it's not a given that they could compel a private lock owner to cooperate or take responsibility.

The Upper St. Anthony Falls lock is also crucial for flood and invasive species management. Again, a yet-undefined private owner (if one exists) might not have the wherewithal to provide these essential functions.

Congress recognizes this threat. In December 2020, it passed the Water Resources Development Act, which states that the Corps should continue to manage the lock and does not have the authority to transfer lock ownership. The divestment plan defies congressional direction.

The recent energy crisis in Texas is a cautionary tale about privatizing essential utility infrastructure. Minnesota needs to resist any efforts to take us down a similar path. The Corps is the appropriate entity to own and maintain the lock.

**Colleen O'Connor Toberman, Minneapolis**

The writer is river corridor director for Friends of the Mississippi River.

 **StarTribune**

## **Exhibit H**

(Document attached)

December 14, 2020

TO: The Honorable Pete Stauber

FROM: John F. Edman, Director  
Explore Minnesota

RE: Restoration of Upper Lock at St. Anthony Falls

Dear Congressman Stauber,

As Minnesota's primary tourism marketing agency whose mission is to inspire consumers and facilitate their travel to and within the state of Minnesota, Explore Minnesota supports the planned restoration of land at the Upper Lock at St. Anthony Falls. The Minneapolis Riverfront area, with its St. Anthony Falls and Stone Arch Bridge, are important landmarks and tourism assets to our state.

The Mississippi River and the Great River Road are the cornerstone of Minnesota's tourism product and attract visitors from around the world. We support the preservation and enhancement of the Upper Lock on the Mississippi River as a cultural and recreational destination for both residents and visitors.

We stand in support of the efforts of the National Park Service, City of Minneapolis and community stakeholders as they secure support and funding to realize this project. Through their efforts, they ensure that this vital area of the Mississippi River will be accessible to future generations of Minnesotans and to the many visitors we welcome to our state every year.

cc: Friends of the Falls  
Terry Mattson, Chair, Explore Minnesota Public Policy Committee  
Patrick Tanis, Outreach Director, Office of Governor Walz

John F. Edman | Director | Explore Minnesota  
121 7th Place East, Suite 360, St Paul, MN 55101 | P: 651-757-1844 | M: 651-238-4975 | F: 651-296-7095  
[www.exploreminnesota.com](http://www.exploreminnesota.com) | [john.edman@state.mn.us](mailto:john.edman@state.mn.us)



**From:** [Gary Meyer](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] USAF lock and dam disposition  
**Date:** Monday, March 15, 2021 2:33:04 PM

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Giving the Upper St Anthony Falls Lock and Dam to a private entity is a bad idea not only because it leaves the management and maintenance of an important Mississippi River structure in the hands of private individuals, but also because it sets a bad precedent for the disposition of the Lower Falls Lock and Dam.

The area immediately below the falls is a unique natural feature where the Mississippi River canyon takes form right in the heart of downtown Minneapolis. A walk into the canyon from a location below the Third Avenue bridge deck to a point under the Tenth Avenue bridge deck is the best way to appreciate how much depth the canyon acquires in this short distance and why Minneapolis was settled here to take advantage of the potential energy that this change in depth represents.

Twenty years ago it was possible to descend into the canyon by walking between the canyon wall and the fence surrounding the lower lock and dam. After 9/11 the Army Corps erected a small spur fence that blocked this path, and, after Brookfield Power (another private entity) was allowed to install a turbine in the lower lock, an enormous obstructing gate was constructed on the upstream end of the Corps' facility.

To the extent that it is possible, the area immediately below the falls (ideally on both sides of the river) should be made accessible to the public so that the falls and its accompanying natural features can be fully appreciated.

Gary Meyer



**From:** [George Bentley](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 7:05:53 PM

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Dear Engineers U.S. Army Corps,

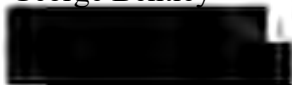
I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
George Bentley





March 18, 2021

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

Re: Comments on the Draft Integrated Disposition Report and Environmental Assessment for the Upper St. Anthony Falls Lock

Dear District Engineer:

On behalf of the National Parks Conservation Association (NPCA), we thank you for the opportunity to comment on the Draft Integrated Disposition Report and Environmental Assessment (EA) for the Upper St. Anthony Falls Lock (USAF lock) in Minneapolis.

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 and over 20,000 in Minnesota to preserve our nation's natural, cultural, and historic heritage for future generations.

St. Anthony Falls and the natural and historic resources in the area surrounding it are among the most important nationally and internationally significant resources within the Mississippi National River and Recreation Area (MNRRA). These are the resources Congress explicitly directed the National Park Service (NPS) to preserve, protect and enhance for the benefit of the American people.<sup>1</sup> Any adverse effects to these resources could constitute an impairment of this park unit under the Organic Act.<sup>2</sup> Additionally, park rangers currently manage tours of the USAF lock 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 MNRRA resources, NPS' role at the lock going forward and national park visitors' use and enjoyment of the site.

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

<sup>2</sup> 16 U.S.C. 1 2 3, and 4.

### **The Corps Should Recommend Partial Disposition**

The Corps should recommend Partial Disposition, Alternative 2 (with modifications), with a partial conveyance to the City of Minneapolis or its designee with the rest of the site retained by the Corps. This alternative more fully aligns with the language and congressional intent of the Water Resources Development Act of 2020 and 2018. A modified Alternative 2 also supports continuation of the navigation mission at the USAF lock and recognizes that the Corps has a federal interest in continuing to own and manage the site. Finally, is supported by Section 216 of the Flood Control Act of 1970, under which the current study is being conducted, because it benefits public interest by furthering the larger community visions for expanded riverfront access and recreational opportunities at the lock.

The Corps should recommend a modified Alternative 2, which does the following:

- The Corps keeps everything the City or its designee does not take.
- The Corps acknowledges that it still has a navigation mission based on how the dams above and below the river prevent mass amounts of sediment from pouring into pool 2.
- The Corps recommends to Congress that they explore adding water supply as a second primary mission.
- The Corps recommends making their recreation mission more robust, with the goal of getting more funding for this arena.

### ***Partial Disposition is Supported by WRDA 2020 directives***

Section 356 (f) of WRDA 2020 directs conveyance “as soon as practicable” of real property at the Upper St. Anthony Falls Lock and Dam to the City of Minneapolis or its designee. For any property not conveyed, “Ownership rights to the Upper St. Anthony Falls Lock and Dam shall not be conveyed under this subsection, and the Secretary shall retain all rights to operate and maintain the Upper St. Anthony Falls Lock and Dam.” This language directs the Corps to partially convey some of the land at the lock to the City and to retain the rest – a partial disposition.

However, the EA ignores those directives. On January 7, 2021, the Corps issued a public statement that “WRDA 2020 does not change the Corps’ recommendation for complete disposal of the federal project at Upper St. Anthony Falls nor its obligation to complete the disposition study.”

In response, the congressional authors of WRDA 2020 sent the Corps a letter on March 1, 2021. It clearly states that “Section 356 of WRDA 2020...requires the Secretary of the Army to convey the real property at the Upper St. Anthony Falls Lock and Dam to the City of Minneapolis...The same section envisions the Corps continuing to operate and maintain the Upper St. Anthony Falls lock under its existing authority.” The congressional intent was that the Corps would retain long-term ownership of and responsibility for the lock and dam elements the City or its designee does not take.

In order to meet the requirements of WRDA 2020, the Corps should recommend Partial Disposition under Alternative 2 with modifications.

### ***Partial Disposition is Supported by WRDA 2018 Directives***

The EA notes that “[t]he TSP is consistent with the requirements of Sections 1168 and 1225 of WRDA 2018... As per Sections 1168 and 1225, it was not the objective of the study for the Corps to develop measures to enhance or improve recreation opportunities, the human environment and the natural environment, however, the TSP is conducive to the new owner and outside stakeholders developing the site to accomplish these objectives” (EA at v).

However, Section 1225 explicitly directed the Corps to include “plans for— (1) carrying out modifications to the Upper St. Anthony Falls Lock and Dam to— (A) preserve and enhance recreational opportunities and the health of the ecosystem; and (B) maintain the benefits to the natural ecosystem and human environment...”

The Corps has ignored this directive. Instead, the Corps relies on some other unidentified entity to pursue such plans after the Corps transfers the property to them. The Corps is not only ignoring the law but speculating that some other entity will follow those directives to prioritize recreation, ecosystem health and the human and natural environments. Yet a future entity will not be bound by those WRDA directives.

In order to meet the directives of WRDA 2018, the Corps should recommend a modified Alternative 2 as outlined above. This Alternative ensures the Corps becomes a partner in the future use of the site with the City or its designee and can work to ensure a plan is developed that meets the WRDA 2018 objectives.

### ***USAF Lock still serves a Navigation Mission***

The Corps is recommending Full Disposition because it asserts the lock no longer serves the navigation mission. However, the USAF lock is key to downstream navigation. A dam failure, the study says, “would have profound impacts on water turbidity and sediment load that would continue for many decades. The sediment influx would end up in dredge shoals in Pool 2 and would likely result in increased dredging” (EA at 18). Because the USAF Lock, two Corps dam sections and the cutoff wall preserve the dam and reservoir at St. Anthony Falls, it is in the interest of downstream navigation to make sure these structures do not fail. If they did, the Corps and the federal government would have to spend millions more in dredging for decades. Therefore, the USAF lock still serves a navigation mission and that should be accounted for in the EA.

### ***Federal Interest at the USAF Lock***

Even though the USAF lock still serves navigation, the Corps also has a federal interest in the future of the USAF lock. At the public meeting on March 3, the Corps said that for there to be a

federal interest, there must be a currently authorized federal mission, but this is not the case. The federal interest, as demonstrated by the Corps' detailed economic analysis for the National Economic Development (NED) plan, is based on whether there are national economic benefits from the project (EA at 53-55). There are such benefits that should necessitate authorizing an expanded mission at the USAF lock.

Federal appropriations and Corps work saved St. Anthony Falls. The Corps built the cutoff wall under the river and the two roll dams and plugged the cavities in the sandstone caused by the Eastman Tunnel collapse. Because of the cutoff wall, Minneapolis and St. Paul water works can supply over one million Twin Cities residents with water, as well as the businesses, institutions and health services that rely on them. The reservoir also supplies the Minneapolis-St. Paul International Airport, which sees over 40 million people pass through annually. Preserving the dams at St. Anthony Falls for water supply should rank as one of the St. Paul District's most important projects.

The EA should recommend a modified Alternative 2 and seek an expanded mission because there is a federal interest in maintaining the water supply of the largest metropolitan area in the region and largest on the Mississippi River.

### ***Partial Disposition Supports Public Interest***

Section 216 of the Flood Control Act of 1970 allows the Corps to review existing projects "*when found advisable due [to] significantly changed physical or economic conditions, and to report thereon to Congress with recommendations on the advisability of modifying the structures or their operation, and for improving the quality of the environment in the overall public interest*" (EA at 2).

The changed physical and economic conditions for the USAF lock have led to the current study, but the law does not limit the analysis to the currently authorized primary purpose. The Corps can consider whether, due to the changed conditions, there are other reasons to recommend modifications to the project that benefit the overall public interest.

A modified Alternative 2 benefits the public interest as evidenced by the economic investments in the downtown riverfront and numerous resolutions, rules and planning studies that promote expanded riverfront access and the need for substantial investment in riverfront parks and amenities. These include the following:

- 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 (Phase I and Phase II);
- 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; and
- State of Minnesota - Mississippi River Corridor Critical Area, Minn. Rules Ch. 6106.

Alternative 2 with modifications ensures the future of the site benefits the overall public interest.

### **The Tentatively Selected Plan Should be Rejected**

The Tentatively Selected Plan (TSP) – Full Disposition, Alternative 1a – should be rejected because it is contrary to congressional direction and intent as described above. It also fails to meet planning objectives because it is largely opposed by the surrounding community. Finally, the TSP is based on inadequate analysis of measurement criteria and environmental impacts.

#### ***EA Fails to meet Planning Objectives***

The EA states that two planning objectives “are the basis for formulation of alternative plans.” One of those objectives is to “[s]upport future visions for continued use of USAF Lock and Dam by stakeholders and the public” (EA at 22). As demonstrated by stakeholder comments at the public meeting, letters to the editor published in the Star Tribune in response to recent media<sup>3</sup> and the letter sent to the Corps from members of the Minnesota congressional delegation (dated 3/1/21), many stakeholders object to deauthorization and disposal other than per WRDA 2020, meaning one of the two planning objectives is not met. The TSP is also contrary to the planning objectives of the community as outlined in several studies and plans listed above. This should lead to a substantive revision of the EA’s conclusions and recommendations to accurately reflect stakeholder interests and ultimately lead to a rejection of the TSP.

#### ***EA Fails to Properly Assess Measurement Criteria***

“Completeness, effectiveness, efficiency, and acceptability are the four evaluation criteria specified for the evaluation and screening of alternative plans. Alternatives considered in any planning study should meet minimum subjective standards of these criteria to qualify for further consideration and comparison with other plans” (EA at 54). As discussed below, the Corps needs to reassess how it evaluated each of these measures and revise the ratings and comments in Table 4-6, which should lead to an overall rating of Low, not High, for Alternative 1a.

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<sup>3</sup> <https://www.startribune.com/readers-write-drinking-water-from-the-mississippi-river-speed-limits-the-benefits-of-jury-trials/600032271/>; <https://www.startribune.com/readers-write-jury-trials-upper-st-anthony-falls-lock-and-dam-covid-vaccinations/600032706/?refresh=true>

### Completeness

“The plan must provide and account for all necessary investments needed to ensure the realization of a successful disposition. Environmental risks, needed real estate acquisition preparations, O&M costs, and potential transferees should be considered. Completeness is also assessed based on the willingness of an entity to take over the facilities, and the ease of conveyance for the government to take the necessary steps to transfer the facilities” (EA at 43).

Under WRDA 2020, the City of Minneapolis or its designee will acquire all the land adjacent to the lock. In addition, WRDA 2020 grants the City or its designee the reserved rights of entry, use of and construction on any property they do not take. As a result, WRDA 2020 has made it much less desirable for another entity to want to take any property offered under the TSP. So the “willingness” for a new entity to “take over the facilities” has become more remote. Also, occupation of the land adjacent to the lock and the reserved rights would likely increase the funding needed from Congress to entice a new owner, making the “ease of conveyance” more difficult, especially given the objections of key members by the Minnesota congressional delegation. The EA does not account for these changes in the analysis. For Alternative 1a, the rating should drop from High to Low for this Measure.

### Effectiveness

“The extent to which the measure achieves the planning objectives and avoids planning constraints” (EA at 43).

As demonstrated by stakeholder comments at the public meeting, media letters and congressional letter, most, if not all, stakeholders object to deauthorization and disposal other than per WRDA 2020. Therefore, none of the action alternatives meet the Effectiveness Measure as they do not satisfy one of the planning objectives. The Corps needs to change the ratings in Table 4-6 per the comments below. In particular, Alternative 1a needs to be reduced from High to Low for this measure. And the comment under 1a in the table that “this alternative is compatible with future visions for the site” must be removed as it is inaccurate, further justifying reducing this measure to Low.

### Efficiency

“The extent to which the measure is cost effective. Efficient plans would require the least cost to ensure the realization of a successful disposal” (EA at 43).

As stated under the Completeness Measure, WRDA 2020 made it far less likely a willing entity will come forward because of the restrictions in place, and if they did, they would likely demand greater financial compensation. Under Alternative 1a, the rating for this measure needs to be reduced from Moderate to Low.

### Acceptability

“Evaluation of whether the measure is acceptable to stakeholders, including the state and federal resource agencies, local governments, non-profit organizations, and the public, and the

extent to which each measure could be implemented concordantly with any of the known future visions for the area” (EA at 43).

As stated above, stakeholders do not support deauthorization and disposal. Consequently, the Corps needs to change the ratings in Table 4-6 for Alternative 1a from High to Low. Also, the Corps needs to remove the statement that “[t]his alternative better accounts for future use at the site...” This alternative is in opposition to future visions for the site.

Given the above analysis, the Corps needs to reconsider its ratings for all the action alternatives. In particular, Alternative 1a should have an overall Low rating and, therefore, is not an acceptable alternative.

### ***EA Fails to Fully Evaluate Environmental Effects***

The EA asserts that “While it can be argued that each action alternative is a step towards realizing a different future vision for USAF, identifying the environmental effects of this would be largely speculative” (EA at 66). In stating this, the EA recognizes that effects could occur but does not identify what those effects will be. Yet the EA then asserts there will be no effects from any of the proposed action alternatives if implemented: “conditions described for each resource would not change under any of the alternatives,” and “the proposed action would not result in any physical changes to the environment” (EA at 66, 96). These assertions are simply not true.

The Corps’ primary objective is, in fact, to end the current conditions under which it owns, operates, and maintains the lock as a part of the 9-Foot Channel Project and is open to many other uses as long as they can leave. The current condition of the USAF is that it is a navigation structure with limited visitor services. If Congress deauthorizes the navigation and recreation missions and transfers Corps property to a non-federal entity, both actions will certainly lead to changes to the “physical, ...biological, cultural, and sociological characteristics of the project study area” and to the lock and related land and infrastructure (EA at 66). Changes will undoubtedly occur, whether we know what those changes are or not. The EA cannot predetermine there will be no effects. This is fundamentally a pre-decisional action.

The new conditions would be dramatically different. Without federal ownership, many of the federal laws, regulations and Executive Orders presented in the study will no longer apply, substantially weakening future environmental reviews. The new owner will use the site in new and different ways that could be both positive or negative depending on the owner, but change will occur either way that effects the lock and all that surrounds it.

Furthermore, by selecting Alternative 1a, the Corps hopes to achieve a specific outcome, and no further review of alternative outcomes will then be possible. Under Section 5, Affected Environment and Environmental Consequences of the Alternatives, the EA states that “[t]his section provides a description of the existing conditions and regulatory setting for each of the resources that could be affected by implementing any of the alternatives as identified in

Chapter 4” (EA at 66). The EA speaks directly to “implementing” one of the alternatives. Each alternative and its potential effects must be thoroughly vetted against the others. But for this EA it states that the effects that could come from implementing the action alternatives are unknown so there is no need to consider the effects. This is contrary to the purpose of releasing and analyzing several alternatives before the preferred alternative is selected and is also inherently pre-decisional.

The EA defines the current or “No Action” conditions, but it has not examined the foreseeable conditions from deauthorization and disposal. The EA should examine impacts from deauthorization and disposal, which would likely include the following:

- Much of the federal review authority will go away.
- The new owner(s) will not use lock and related property for navigation and will not need to use it for flood mitigation.
- Recreation use will be deauthorized, and, as the Corps repeatedly states, recreational use will increase.
- New amenities will be added to the site with greater recreation.
- New uses of the buildings and facilities will occur with increased recreation or for other uses.

### ***EA Fails to Analyze Impacts on Historic Properties***

In the Draft Finding of No Significant Impact (FONSI), the Corps asserts that: “Pursuant to section 106 of the National Historic Preservation Act of 1966, as amended, the U.S. Army Corps of Engineers determined that the recommended plan would have no potential to cause effects on historic properties.” This statement is unfounded. The Corps has not initiated the Section 106 process, nor has it evaluated the effects deauthorization and disposal could have on the known and potentially unknown historic sites in the area, including the USAF Lock and Dam and the St. Anthony Falls Historic District. The Corps cannot claim “no potential to cause effects” when it has done nothing to evaluate the potential effects.

The EA states that “[t]he proposed action is in partial compliance with this law” (EA at 94). To support this claim, the EA states: “Preliminary, informal, discussions with the MNSHPO, Native American groups, various agencies, NGOs, and other stakeholders have been ongoing for several years. Formal coordination and consultation with the aforesaid parties will occur following selection of an alternative and initiation of a federal undertaking” (EA at 94).

We know of no formal consultation with the Mississippi National River and Recreation Area or any of the other parties mentioned that has specifically addressed the federal actions. Preliminary, informal meetings and contacts do not count as compliance with Section 106. Under 36 CFR §800.3, the regulations describe how to initiate the Section 106 process. Since the Corps has not followed this subsection, it has not initiated the process. Subsection 800.4 defines the process for identifying historic sites, and Section 800.5 details how to evaluate potential impacts of federal actions on any sites identified. The Corps has not started a review under either subsection. Consultation is required at each step, and the Corps has not officially

begun to identify and engage the interested parties. The Corps cannot determine there is “no potential to cause effects” when it has not met any of the steps required by the Section 106 implementing regulations within 36 CFR Part 800. The Corps will need to negotiate a Programmatic Memorandum of Agreement with all interested parties that will, in part, define a process by which the Corps would transfer any property to a non-federal entity.

The Corps’ assertion with regard to compliance with Section 106 is, therefore, false and the FONSI must be corrected. The Corps must conduct a formal Section 106 review before it can determine whether the federal actions have the potential to affect historic properties. Given the historic significance of the sites at St. Anthony Falls, significant effects could require an environmental impact statement. To know if this is the case, the Corps must initiate and complete the Section 106 process before rating or selecting alternatives and before signing a FONSI.

The above comments also apply to *Executive Order 11593: Protection and Enhancement of the Cultural Environment*. Until the Corps has completed the Section 106 process, they will not have met the requirements of this Executive Order.

In Section 7.9 *Executive Order 13175 Consultation and Coordination with Indian Tribal Governments*, the EA asserts that the Corps has completed “preliminary, informal discussions...” As with Section 106, these discussions do not count as formal consultation under this Executive Order. Formal and official consultation must begin and must inform the process for selecting alternatives, not occur after the Corps has selected its TSP.

### ***EA Fails to Address Federal Agency Concerns***

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.”<sup>4</sup> Because the EA asserts that there will be no environmental effects from full disposition, there is no evaluation of the impacts on the seven resource types identified in the park’s enabling legislation. NPS submitted comments during the scoping phases of this EA raising concerns about protection of these resources. The EA provides no assurances that these resources will not be diminished with a full disposition alternative.

Additionally, NPS pointed out during the scoping phase that as a federal agency, it will lose substantial oversight of development at the lock if it is deauthorized and disposed of to a non-federal entity. The EA does not address the NPS comments in the draft and should include an analysis of this loss of federal oversight.

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<sup>4</sup> Public Law 100-696, Section 701(a), 102 Stat. 4599, Nov. 18, 1988.

### ***EA Fails to Fully Analyze Deauthorization***

Deauthorization is an action with potential effects that the EA needs to address separate from disposal. Deauthorization allows transferring the property out of federal control, which leads to actions that will not need to meet rigorous federal laws, regulations and policies for review and approval. It does not matter who the new entity is or what they plan to do; details are not necessary to recognize that there is potential for adverse effects to the human environment from deauthorization. Therefore, the EA must identify those possibilities and evaluate them. Only deauthorization makes the action alternative possible.

### ***EA Fails to Analyze Mitigation for Adverse Environmental Effects***

The EA determines that “[n]o adverse environmental effects are anticipated for the TSP. Therefore, no mitigation is identified.” (p. 89) The EA has not assessed the potential effects and therefore, it cannot be determined what mitigation is needed or not. Many of the impacts of deauthorization are not speculative, nor are the most likely consequences of disposal under Alternative 1a or the other action alternatives. Proposing a specific alternative fixes it in place, and therefore, the EA must address any impacts from doing so, which means before deauthorization and recommendations for disposal. Waiting until after the TSP is approved and deauthorization happens dramatically narrows the potential for discussing mitigation later.

### ***EA Fails to Evaluate Impacts on Water Supply***

As previously stated, a serious examination of all the national and international connections that would be disrupted by a failure of the cutoff wall or the surface damming structures at St. Anthony Falls must be a part of the EA NED analysis. For example, a loss of water to the airport would reverberate nationally and internationally. A serious examination of all the national and international connections that would be disrupted by a failure of the cutoff wall or the surface damming structures at St. Anthony Falls must be a part of the NED analysis. The EA does not mention the St. Paul water supply in the consideration of dam removal and overall consequences of a dam failure at St. Anthony Falls. As the EA notes, the river would cut down the channel for 30 miles upstream. The St. Paul water intake is only about nine miles upstream and would undoubtedly be in jeopardy. The EA need to examine this concern.

### ***EA Fails to Fully Analyze Recreational Impacts***

The EA states: “Under all alternatives, recreational use is anticipated to increase in association with the City of Minneapolis’ plan to create a ‘...comprehensive recreational, touristic, and interpretive experience’ at the site” (EA at 87). However, there is no basis to conclude the effects would be different across alternatives. Yet deauthorization and disposal could adversely affect those recreation plans if the property goes to an entity not willing to work with the City and its partners.

### ***EA Fails to Evaluate Safety***

The EA does not consider the impacts of a cutoff wall failure in this section. Regardless of who owns and is responsible for the cutoff wall, the Corps built it and should consider the consequences of its condition and potential failure as an essential part of this study.

### **Current Operations and Maintenance**

While outside the purview of the EA, it should be noted that the Corps is jeopardizing the future of the site through neglect. If the USAF lock is not deauthorized and there is no willing taker, the Corps has said the site will start deteriorating since the site is not a priority. But at the public meeting, we learned that some elements are already deteriorating, and the report talks about maintaining the site in a “fix as fail” mode. Given the USAF lock’s prominent location downtown Minneapolis and at one of the most visited sites on the whole Mississippi River, the Corps should not allow the lock to deteriorate. In addition, allowing a site eligible for the National Register to deteriorate is considered neglect and is an adverse under Section 106 of the National Historic Preservation Act.

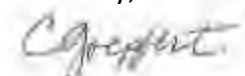
### **Conclusion**

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 and residents alike can experience the power of the falls and learn about the area’s history. The Corps is a valued partner in this endeavor.

We urge the Corps to recommend a partial disposition under Alternative 2 with modifications as it is in the “overall public interest” per Section 216. It allows a portion of real estate to be transferred to Minneapolis to realize the community’s vision and the remaining structures can continue to be expertly managed by the Corps to carry out navigation and water supply missions.

We thank you for the opportunity to submit comments.

Sincerely,



Christine Goepfert  
Associate Director, Midwest Region

### **Minnesota Field Office**

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



March 16, 2021

District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
[mplslocksdisposition@usace.army.mil](mailto:mplslocksdisposition@usace.army.mil)

Dear Jonathan Sobiech and Nan Bischoff:

Please consider this letter a formal comment in response to the Upper St. Anthony Falls Lock and Dam Disposition Study draft report, released January 20, 2021.

### **Our Organization**

Green Minneapolis is a non-profit conservancy with the mission to advance the vibrancy of downtown Minneapolis through parks and greening.

Our vision is to grow a green future for downtown, with tree-lined streets and active public spaces that enrich quality of life, create a healthier environment and connect people through place.

Minneapolis is the economic engine for this region and our state, and therefore it is essential that Minneapolis be a compelling, welcoming and vibrant place to live, work and play.

We believe that excellent public spaces and public infrastructure are essential to creating the kind of environment that enables our businesses large and small to attract and retain the top talent they need to compete in a global marketplace.

### **Support for Partial Disposal, Public Use**

In previous comments to the Army Corps, Green Minneapolis stated its support of Senators Klobuchar and Smith's guidance on the Upper St. Anthony Falls Lock and Dam, particularly that the reuse of the Upper Lock must reflect the public interest and be consistent with the vision adopted by the City of Minneapolis in its Resolution 2018R-098, which states, in part, "That the City Council recognizes the Upper St. Anthony Falls Lock and Dam and surrounding area as a nationally significant historical, recreational, scenic, cultural, natural, economic and scientific resource."

Green Minneapolis continues to support revitalization efforts of excess land at the Upper Lock. The Upper Lock has stood as a gray, imposing eyesore at a key location on our riverfront for far too long.



We commend Congress for advancing their directive in Section 356 of WRDA 2020, signed into law on December 27, 2020, which requires the Secretary of the Army to convey the real property at the Upper St. Anthony Falls Lock and Dam to the City of Minneapolis, Minnesota, or its designee “as soon as practicable.”

**We ask the Army Corps to expedite its Implementation Guidance for WRDA 2020 and convey land surrounding the Upper Lock to the City of Minneapolis or its designee for public use within the next year.**

**Opposition to Full Disposal**

**We are opposed to the Army Corps recommendation for Alternative 1a: complete deauthorization and disposal of the Upper Lock combined with offering a monetary incentive to the new owner.**

This recommendation is in clear conflict with Section 356 of WRDA 2020, which indicates that Congress envisions the Corps continuing to operate and maintain the Upper St. Anthony Falls lock under its existing authority. It is concerning the Corps continues to try to abandon its maintenance and operating responsibilities at the Lock despite clear Congressional direction.

Furthermore, the Army Corps’ asserts that Alternative 1a is highly acceptable to stakeholders, despite having no known support from regional or local government entities, non-profits, or the general public.

The Upper Lock must continue to be held in the public domain and maintained in the federal interest.

Sincerely,

David A. Wilson  
Chair, Board of Directors  
Green Minneapolis

**From:** [Greg Hoseth](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] St. Anthony Falls disposition  
**Date:** Wednesday, March 17, 2021 7:34:43 AM

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We are just a tiny operation on the Mississippi River north of St. Anthony Falls. We give people tours at the lock. The area has so much history.

We would like to make our suggestion to the disposition. In our opinion, if the lock is no longer going to be used then we would be in favor of the federal government getting out of the lock business and restore the area to what it was before the lock and then leave. Remove the lock, put the balance of the dam back in place including replacing the wood that is on top of the current dam with material that would be better suited to water like concrete. Take out the metal structure on the Stone Arch Bridge and replace it with the same or similar stone like it was previously. Remove all the round barge tie offs.

There is no reason to be spending millions of dollars annually to do nothing. All the infrastructure in the river is blight.

I would offer one other proposal. Turn the lock into a HydroElectric plant. If the blight has to stay then make it useful. By the way, we are all electric and one is solar electric.

[mplswatertaxi.com](http://mplswatertaxi.com)

*Greg Hoseth*



**From:** [Gregory Rasmusson](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 5:56:30 PM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Gregory Rasmusson



**From:** [James Marsden](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 6:30:05 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
James Marsden



**From:** [Janet Neihart](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 2:56:03 AM

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Dear Engineers U.S. Army Corps,

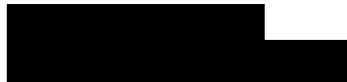
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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Janet Neihart



**From:** [Janice Karpel](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 8:26:17 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Janice Karpel



**From:** [Jennifer Goepfert](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Wednesday, March 17, 2021 10:55:45 AM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Jennifer Goepfert



**From:** [Jennifer Krinke](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 6:03:05 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Jennifer Krinke



**From:** [JOANNA HEILING](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 11:00:08 PM

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Dear Engineers U.S. Army Corps,

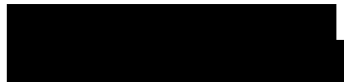
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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
JOANNA HEILING



**From:** [Joann Nesser](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 11:25:43 PM

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Dear Engineers U.S. Army Corps,

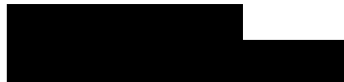
I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Joann Nesser





March 9, 2021

The Honorable John Whitley  
Acting Secretary of the Army  
108 Army Pentagon  
Washington, D.C. 22202

Dear Acting Secretary Whitley:

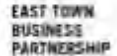
As leaders of civic and business organizations in Minneapolis, we write to affirm the importance of federal infrastructure at St Anthony Falls to our community, to voice our support for the strategic direction set by federal legislation last year regarding the Upper St. Anthony Falls Lock and Dam, and to express serious concern with a disconnect between that strategy and recent actions by the St. Paul District of the Army Corps of Engineers (Corps). In full alignment with our congressional leadership, we urge you to collaborate closely with the City of Minneapolis on a timeline and process which will facilitate the partial disposition and conveyance of the property at the Upper Lock, as directed in Section 356 of the Water Resources Development Act (WRDA) of 2020, within the next year.

St. Anthony Falls is a sacred space for local native tribes, the birthplace of Minneapolis, our city's greatest natural wonder, and the only waterfall on the great Mississippi River. Its significance is both local and national in scale. After the Upper St. Anthony Falls Lock and Dam closed to navigation in 2015, dialogue about how this infrastructure and its surroundings can and should evolve in a new era gained a new urgency. Since that time, a consensus emerged between key stakeholders that a partial disposition of the site – in which the Corps retains ownership of the infrastructure necessary to operate the lock itself under its existing authority, and local partners take ownership of the remainder of the property and responsibility to improve that property for public use and enjoyment – is the best possible outcome.

This approach was codified into federal law through the WRDA action last year. Section 356 of WRDA 2020 – which was signed into law on December 27, 2020 – requires the Secretary of the Army to convey the real property at the Upper St. Anthony Falls Lock and Dam to the City of Minneapolis, Minnesota, or its designee “as soon as practicable.” The same section envisions the Corps continuing to operate and maintain the Upper St. Anthony Falls lock under its existing authority.

The St. Paul District of the Army Corps of Engineers issued a public statement earlier this year indicating that they intend to pursue complete disposition of the property at the Upper St. Anthony Lock and Dam. This is in clear conflict with Section 356 of WRDA 2020.

The difference between partial and full disposition is not slight nor a matter of semantics. Through partial disposition, the federal government, local government, and community partners work together in roles each are uniquely well-suited to perform. The Corps' real property and maintenance responsibilities are stream-lined while they continue to operate infrastructure in alignment with their mission and core services. The City of Minneapolis accepts ownership of the remaining property, a site of strategic importance for outdoor recreation, cultural preservation, and other significant local public interests. Civic organizations support community engagement, planning, design, and fundraising for future improvements to the site as a public gathering place centered around the lock. In a full disposition scenario, federally-designed and operated flood control and water supply infrastructure is sold on the open market, our community risks a purchase of a critical parcel with a land use that is incompatible with decades of



riverfront planning and improvements, and years of groundwork building a vision for improving the site while dramatically improving public engagement and awareness of the critical infrastructure the Army Corps of Engineers performs is squandered. The vast difference in public interests being served in these two scenarios led to federal action last year, it remains compelling today, and now it has the force of law.

We affirm our community's broad-based commitment to the partial disposition strategy, and we ask for your leadership in carrying out the steps described in Section 356 of WRDA 2020.

Sincerely,

Steve Cramer, President & CEO  
mpls downtown council & Downtown Improvement District

Kevin Lewis, President & CEO  
Building Owners and Managers Association of Greater Minneapolis

Melvin Tennant, President & CEO  
Meet Minneapolis

Jonathan Weinhagen, President & CEO  
Minneapolis Regional Chamber of Commerce

Carina Aleckson, Board President  
East Town Business Partnership

**From:** [Karen Crowley](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 5:37:30 PM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Karen Crowley



**From:** [Kari Fosse](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 12:50:07 AM

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Dear Engineers U.S. Army Corps,

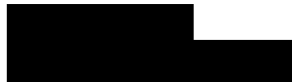
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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Kari Fosse



ST ANTHONY FALLS HERITAGE BOARD  
704 SOUTH SECOND STREET • MINNEAPOLIS MINNESOTA • 55401

March 12, 2021

District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
mplslocksdisposition@usace.army.mil

Dear Jonathan Sobiech and Nan Bischoff:

The Saint Anthony Falls Heritage Board submits this statement in response to the request for public comment regarding the USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft report, first released December 16, 2020, and re-issued January 20, 2021. At its February 12, 2021 meeting the Heritage Board voted to send a letter of support for partial disposition of the lock.

The Minnesota Legislature in 1988 created the St. Anthony Falls Heritage Zone and St. Anthony Falls Heritage Board (Minnesota Statutes, Chapter 138.761-766) for the purpose of providing interpretive resources for the public within the St. Anthony Falls Heritage Zone encircling the Minneapolis central riverfront, an area rich in natural, scenic, recreational, and historic elements. The Heritage Board consists of 22 members, including representatives from the City of Minneapolis, Minneapolis Park and Recreation Board, Hennepin County, Minnesota Historical Society, Minneapolis Heritage Preservation Commission, Minnesota State Historic Preservation Office, Minnesota State Legislature, and Hennepin History Museum.

Over the years the Heritage Board has funded, guided, and spurred many initiatives and interpretive efforts along the Minneapolis Riverfront. Partner members of the Heritage Board and others in the public and private sectors have worked diligently to create a series of destinations within the Heritage Zone for the public to enjoy while learning about Minnesota's past.

The Heritage Board has supported a comprehensive approach to Minneapolis riverfront development that has been expressed in its interpretive plan *Power of the Falls: Renewing the Vision for St. Anthony Falls Heritage Zone* (2009), in which the Upper St. Anthony Falls Lock is a significant historic resource in the St. Anthony Falls Heritage Zone.

Presently, the lock creates a barrier to public access to the Mississippi River and St. Anthony Falls, but with proper redevelopment could be a centerpiece of the visitor experience with access to the river not seen in 150 years. Its location at a transportation nexus and nearby other visitor attractions such as Water Works Park, the Stone Arch Bridge, Mill Ruins Park, and Mill City Museum make its development as a visitor center crucial to the continued revitalization of the Minneapolis central riverfront.

Letter to District Engineer, St. Paul District, Corps of Engineers  
March 12, 2021  
Page 2

On July 10, 2017, the Heritage Board joined a coalition of non-profit organizations, cultural advocates and associations in adopting the vision statement:

"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 City of Minneapolis, Minneapolis Park & Recreation Board, the Minnesota Legislative Citizen Commission on Natural Resources, and private partners are standing by, ready to implement a multimillion-dollar series of development projects on the Minneapolis Central Riverfront that would be possible with partial disposition, while a full disposition of the property would interfere with these projects.

The St. Anthony Falls Heritage Board recognizes the recreation, tourism, and interpretive opportunities of the Upper St. Anthony Falls Lock and Dam, as well as the importance of the U.S. Army Corps of Engineers continuing its ownership and flood management operations.

The Saint Anthony Falls Heritage Board therefore supports the partial conveyance of the Upper St. Anthony Falls Lock and Dam, as directed by Congress in the Water Resources Development Act of 2020, and urges the U.S. Army Corps of Engineers to reconsider its stated desire to fully dispose of the property.

Thank you for the opportunity to comment on the result of the Study and to express our vested interest in the future of this site.

If you have any questions regarding our comments, please contact Kent Whitworth at 651-259-3100 or [kent.whitworth@mnhs.org](mailto:kent.whitworth@mnhs.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "Kent Whitworth", with a stylized flourish at the end.

Kent Whitworth, Chair  
Saint Anthony Falls Heritage Board



## Wilderness Inquiry

March 1, 2021

District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
[mpsllocksdisposition@usace.army.mil](mailto:mpsllocksdisposition@usace.army.mil)

Dear Jonathan Sobiech and Nan Bischoff:

Wilderness Inquiry submits this statement in response to the request for public comment regarding the USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft report, first released December 16, 2020, and re-issued January 20, 2021. Wilderness Inquiry is a 501c3 organizations that provides water-based educational programs to Twin Cities students near the Lock and Dam. You may have seen our large 24-foot Voyageur Canoes on the River.

Wilderness Inquiry has long supported a comprehensive approach to riverfront development and thoughtful planning of parks, commercial districts and residential communities near our city's greatest natural asset – the Mississippi. Our goal is to provide as much access to the Mississippi River as possible. The Upper Lock at St. Anthony Falls is key to the revitalization of the Minneapolis central riverfront.

Wilderness Inquiry is opposed to the Army Corps' recommendation of full disposition of the Upper Lock with monetary incentive. We are aware of no non-federal entity willing and able to fully acquire the Lock and assume associated flood mitigation responsibilities. Furthermore, Lock operations and maintenance should not be in the hands of a private entity. Should anything go wrong, we do not have confidence that a private, non-government entity would have the wherewithal to manage and pay for repair and recovery.

Wilderness Inquiry urges the U.S. Army Corps of Engineers to abandon its stated recommendation to fully dispose of the property. The Corps should continue to own and maintain the Lock, reliably supporting water supply and providing flood mitigation responsibilities.

Excess land that is not necessary for these functions, however, should be quickly transferred to the City of Minneapolis or its designee for public use. This simple action was already directed by Congress in the Water Resources Development Act of 2020 and requires no further study.

Thank you for the opportunity to comment on the result of the Study and express our interest in the future of this site. If you have any questions regarding our comments, please contact me.

Sincerely,

Kim Keprios  
Executive Director  
[kim@wildernessinquiry.org](mailto:kim@wildernessinquiry.org)  
612-676-9402

**From:** [Kimberley Sonderegger](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Wednesday, March 17, 2021 12:54:28 PM

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Dear Engineers U.S. Army Corps,

As an archaeologist and historian, I am concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Thank you for your attention to this matter.

Regards,  
Kimberley Sonderegger



**From:** [Kristen Clements](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 4:07:21 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Kristen Clements

A black rectangular redaction box covering the signature area.

**From:** [Kurt Klussendorf](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Upper St. Anthony Falls Lock  
**Date:** Saturday, January 9, 2021 9:52:58 AM

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Saw an article regarding a possible transfer of ownership of this lock and dam in the 1/6/2021 Villager (myvillager.com).

We are in favor of returning the upper Mississippi to a wild, free-flowing state to the extent possible. We believe this would improve esthetic and recreation opportunities and serve to prevent invasive Asiatic carp from moving further north.

Thank you!

Kurt and Barb Klussendorf



**From:** [Larry Balfanz](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 10:34:45 PM

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Dear Engineers U.S. Army Corps,


I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Larry Balfanz



**From:** [Laura Merriam](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 6:33:03 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Laura Merriam



**From:** [Laura Powers](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 6:10:43 PM

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Dear Engineers U.S. Army Corps,

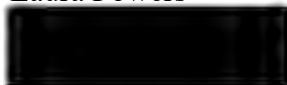
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The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Laura Powers



**From:** [Lisa Goodlander](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 5:42:28 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Lisa Goodlander

A black rectangular redaction box covering the signature area.



VIA EMAIL

District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
[mplslocksdisposition@usace.army.mil](mailto:mplslocksdisposition@usace.army.mil)

March 17, 2021

**Re: Comments of the St. Anthony Falls Alliance Regarding the Upper St. Anthony Falls Lock Disposition Study Draft Report Re-Issued January 20, 2021**

Dear Jonathan Sobiech and Nan Bischoff:

The St. Anthony Falls Alliance (SAFA) submits this letter in response to the request for public comment regarding the USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft report, first released December 16, 2020, and re-issued January 20, 2021.

Established in 2014 to facilitate a unified approach to protecting and enhancing the amenities and aesthetics of the Minneapolis central 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 comments dated October 19, 2019, SAFA asked the US Army Corps of Engineers ("the Corps") to consider and be consistent with the Minneapolis Park and Recreation Board's Master Plan for the Central Mississippi Riverfront Regional Park ("Regional Park") in its work on the Upper St. Anthony Falls Lock Disposition Study. Based upon the vision and goals of the Regional Park Master Plan, SAFA urged a focus on partial disposition and opportunities for coordination with the City and the Minneapolis Park and Recreation Board to further local adopted plans for the central riverfront.

SAFA is opposed to the Corps' recommendation of full disposition of the Upper Lock with monetary incentive because it risks the integrity of the lock structure and threatens implementation of the Regional Park Master Plan Vision to "connect people to the nature, culture, and spirit of the dynamic river landscape at the birthplace of Minneapolis." We

endorse the comments submitted by the City of Minneapolis and Friends of the Falls who also oppose full disposition of the Upper Lock.

### Integrity of the Upper Lock

SAFA is not aware of any public entity interested or capable of taking over the Corps' responsibilities for flood control and maintenance at the Upper Lock. Allowing a private entity to take over the Corps' responsibilities raises serious questions regarding the capacity of any non-government entity to maintain routine operations, much less the ability to fund and oversee any needed repairs should something go wrong. To preserve the integrity of the Upper Lock and its functions of supporting water supply and flood mitigation, the Corps should continue to own and maintain the Lock.

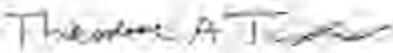
### Connecting People to the Falls

The lock structure itself, particularly the top of the lock walls, allows the public to get close to the Falls, and it is also key to interpreting the navigational history of the central riverfront. Land surrounding the facilities not required to fulfill flood control and maintenance functions is important to connect people to the river. This land should be transferred as soon as possible to the City of Minneapolis or its designee, as directed by Congress in the Water Resources Development Act of 2020. The Corps must not block meaningful public use of this site envisioned by Regional Park Master Plan goals to connect people to the natural and cultural resources of this area.

SAFA urges the Corps to abandon its stated recommendation to fully dispose of the property and work instead with the City of Minneapolis to ensure partial disposition that will support and enhance goals for improvements intended to make the lock and dam site a vibrant hub connecting people to the Mississippi River.

Thank you for the opportunity to submit these comments.

Sincerely,



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

**From:** [Mandie Flint](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 6:39:44 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Mandie Flint



**From:** [Mark Strobel](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Thursday, March 18, 2021 3:11:58 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Mark Strobel



**From:** [Mary Pierce](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 8:45:56 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Mary Pierce



**From:** [Mary Eide](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 7:20:35 PM

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Dear Engineers U.S. Army Corps,

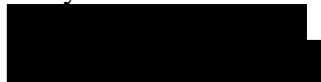
I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Mary Eide



**From:** [Matt Angell](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Restore the Mississippi River Gorge  
**Date:** Tuesday, February 9, 2021 3:59:07 PM

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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.

Sincerely,

Matt Angell

A large black rectangular redaction box covering the signature area.

**From:** [Matthew Mueller](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 23, 2021 7:18:32 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Matthew Mueller



**From:** [Megan O'Hara](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 9:08:01 AM

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Dear Engineers U.S. Army Corps,


I'm one of many Minnesotans concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public. Since the lock facility was built and maintained by public dollars, it is essential that this remain in the public realm.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Megan O'Hara



**From:** [Melissae Bletsian](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 6:51:56 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Melissae Bletsian



**From:** [Michael Erickson](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 4:32:12 AM

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Dear Engineers U.S. Army Corps,

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Regards,  
Michael Erickson



**From:** [Michael Heinsohn](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Thursday, March 18, 2021 6:14:13 AM

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Dear Engineers U.S. Army Corps,

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Michael Heinsohn



**From:** [Michelle Gobely](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 5:50:37 PM

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Dear Engineers U.S. Army Corps,

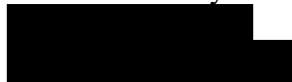
I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Michelle Gobely





March 17, 2021

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

Via [MplsLocksDisposition@usace.army.mil](mailto:MplsLocksDisposition@usace.army.mil)

Regarding: Complete disposal of Upper Saint Anthony Falls Lock and Dam

Dear Ms. Bischoff:

On behalf of Mississippi Park Connection, we are pleased to submit comments to the U.S. Army Corps of Engineers regarding the disposition of the Upper St. Anthony Falls Lock and Dam.

Mississippi Park Connection is the nonprofit, charitable partner to 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.

Mississippi Park Connection began as the local fund of the National Park Foundation, under the name Mississippi River Fund. Since our inception in 2003, we have contributed more than \$4 million to the National Park Service and its many partners in the community, improving the health of the Mississippi River and our community, enhancing recreation access, and providing on-river education experiences to more than 100,000 young people.

The National Park Service has a perpetuity mission for the community and for the river. Our goal at MPC is to help the community take the long view with regard to the river and our national park. What is the state of the river 50 years from now? 100?

### **Continued Mission and Partial Disposition at Upper St. Anthony**

We urge the corps to consider its other missions that are still vital to the upper lock, including flood mitigation, water supply and recreation. Partial *but not full* disposition also would allow other community partners, such as the City of Minneapolis and Friends of the Falls, to adaptively re-use the facility. This re-use honors our history, preserves the landmark, and provides connection to other premiere destinations in

the St. Anthony Falls Heritage Area. Partial disposition is also consistent with the 2020 WRDA bill and we urge the corps to convey lands adjacent to the Upper St. Anthony Falls lock to the City of Minneapolis, and provide additional licenses over the lock structures for recreation, tourism and interpretative purposes.

### **Full disposal of the property**

Leadership at the corps should embrace the responsibility that comes with building and owning the massive infrastructure of the lock and dam. While understandable that the corps desires to rid itself of the financial burden of a lock that is no longer used for navigation, the corps cannot rid itself of its responsibility. This responsibility extends to other corps projects too, including Lower St. Anthony Falls Lock and Dam as well as Lock and Dam #1.

Above all, the corps should recognize that the federal interest and the public interest are one and the same. When staff repeatedly assert that the lock is “no longer in the federal government’s interest,” one is left with the impression that the federal government is somehow removed from the interests of its citizenry. Passing off the stewardship of infrastructure to the citizens of Minneapolis is irresponsible. If there are aspects of the lock infrastructure that do not aid in flood mitigation or protection of water supply, and if no other entity wants to claim ownership, then the corps should remove the infrastructure.

We have a concern that abandoning the site and turning the property over to GSA will inevitably lead to crumbling, un-safe structures and urge the corps not to cease or cut back funding for maintenance until a lock has been removed or transferred to a new owner. We urge the corps to work proactively with city and community leaders to plan for its future.

We appreciate the opportunity to submit comments and are grateful for your commitment to community engagement.

Sincerely,



Barry Clegg  
Board Chair



Katie Nyberg  
Executive Director



## Minnesota Mississippi River Parkway Commission

56 33<sup>rd</sup> Avenue South, #283 • St. Cloud, Minnesota 56301

651-341-4196 • [info@MnMississippiRiver.com](mailto:info@MnMississippiRiver.com)

**Members of the House:** Emma Greenman (D-63B); Kristin Robbins (R-34A) **Members of the Senate:** David Senjem (R-25); Patricia Torres Ray (DFL-63) **State Agency Appointees:** Paul Hugunin – Agriculture, Marni Karnowski – Transportation, Lisa Havelka – Explore Minnesota Tourism, Grant Wilson – Natural Resources, David Kelliher – Historical Society **Regional Appointees:** Sally Fineday – Lake Itasca to Grand Rapids, Megan Christianson – Grand Rapids to Brainerd, Karl Samp – Brainerd to Elk River, John Anfinson – Elk River to Hastings, Jennifer Weaver – Hastings to Iowa Border **Member at Large:** Anne Lewis

Sent via email - [MplsLocksDisposition@usace.army.mil](mailto:MplsLocksDisposition@usace.army.mil)

March 17, 2021

Col. Karl Jansen, District Engineer  
U.S. Army Corps of Engineers St. Paul District  
ATTN: Regional Planning and Environment Division North  
180 Fifth Street East, Suite 700  
St. Paul, Minnesota 55101-1678

Dear Colonel Jansen,

The Minnesota Mississippi River Parkway Commission (MN-MRPC) would like to comment on the Upper St. Anthony Falls Lock and Dam Disposition Study draft report. Our comments focus on the mission of the MN-MRPC and how that mission relates to the potential opportunities and impacts coming from the Upper St. Anthony Falls Lock and Dam Disposition Study.

As established under Minnesota Statute 161.1419, the MN-MRPC's mission is to promote, preserve and enhance the resources of the Mississippi River Valley and to develop the highways and amenities of the Great River Road, which, in February 2021 received All-American Road status. The MN-MRPC promotes, supports, and advances actions, responsibilities, procedures, controls, operational practices, and strategies to maintain the intrinsic archaeological, cultural, natural, historic, recreational, and scenic qualities that support National Scenic Byway Designation. The MN-MRPC's interest in the Disposition Study relates to these intrinsic qualities.

The Great River Road/All-American Road runs adjacent to the Upper St. Anthony Falls Lock, and the nearby Mill City Museum is a designated Great River Road Interpretive Center. We know and appreciate that you are partnering with the Mississippi National River and Recreation Area on visitor services at the lock. The St. Anthony Falls Historic District features the Pillsbury A and Washburn A Mills, both of which are National Historic Landmarks, and the James J. Hill Stone Arch Bridge, a National Engineering Landmark. Given its connection to the history of Mississippi River navigation and the development of America's agricultural industry, Upper and Lower St. Anthony Falls Locks and Dams have been determined eligible for the National Register of Historic Places. With all the planning and projects already built to turn the St. Anthony Falls riverfront into a world-class visitor destination, the opportunities to inform and educate visitors about the Mississippi River and the region are immense. The Great River Road affords access to that interpretation. **We strongly encourage that you consider how your recommendations and decisions about the lock's future may affect the Great River Road's ability to continue this important and significant access** and that those considerations are included in the final Disposition Study.

The MN-MRPC encourages your consideration of comments submitted or being submitted by our member agencies. The **MN Department of Natural Resources** will be submitting comments separately and, to avoid any confusion, is **abstaining** from participation in this letter specific to the MN-MRPC.

The MN-MRPC includes representatives of the Minnesota Senate and House, the Minnesota Departments of Transportation, Natural Resources and Agriculture, the Minnesota Historical Society, Explore Minnesota Tourism, five regionally elected citizens and an at-large member. The National Park Service serves as a non-voting technical member. If you have questions or would like additional information, please contact the MN-MRPC office at 651-341-4196. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Senjem". The signature is fluid and cursive, with a large initial "D" and a stylized "S".

Senator David Senjem, Chair

**From:** [Nancy Kennedy](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 7:56:48 AM

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Dear Engineers U.S. Army Corps,

Please do not abandon the upper St. Anthony Falls lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Nancy Kennedy



**From:** [Nancy Loesch](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 12:20:40 AM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Nancy Loesch



**From:** [Natalie Stephens](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 8:29:33 PM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Natalie Stephens



**From:** [Nicholas Vorpahl](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 11:52:44 PM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.


The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Nicholas Vorpahl





March 15, 2021

District Engineer  
St. Paul District, Corps of Engineers  
Attn: Regional Planning and Environmental Division North  
180 Fifth Street East  
Minneapolis, MN 55101

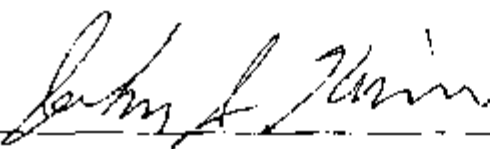
Re: St. Anthony Falls Lock and Dam Requested Comments


To Whom It May Concern:

Since the glaciers retreated the Mississippi River has been the major transportation artery in North America. It has been the lifeblood of Central Valley agriculture and exported nourishment for the rest of the world. The Corps of Engineers tamed the Mississippi around 1900. Hubert Humphrey extended its reach in the 1960s.

Recently, uses of the Mississippi River have been restricted. The locks were closed, fences erected and restaurants were torn down. Can this reversal endure?

Various interested parties need to work together to share and promote the River. This worked well on Nicollet Island and can do so for the Mississippi.

By:  BSME





VIA EMAIL

District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
[mpllocksdisposition@usace.army.mil](mailto:mpllocksdisposition@usace.army.mil)

March 1, 2021

**Re: Comments of the North Loop Neighborhood Association Regarding the Upper St. Anthony Falls Lock Disposition Study Draft Report Re-Issued January 20, 2021**

Dear Jonathan Sobiech and Nan Bischoff:

The North Loop Neighborhood Association (NLNA) this letter in response to the request for public comment regarding the USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft report, first released December 16, 2020, and re-issued January 20, 2021.

In comments dated October 19, 2019, SAFA asked the US Army Corps of Engineers ("the Corps") to consider and be consistent with the Minneapolis Park and Recreation Board's Master Plan for the Central Mississippi Riverfront Regional Park ("Regional Park") in its work on the Upper St. Anthony Falls Lock Disposition Study. Based upon the vision and goals of the Regional Park Master Plan, SAFA urged a focus on partial disposition and opportunities for coordination with the City and the Minneapolis Park and Recreation Board to further local adopted plans for the central riverfront.

NLNA is opposed to the Corps' recommendation of full disposition of the Upper Lock with monetary incentive because it risks the integrity of the lock structure and threatens implementation of the Regional Park Master Plan Vision to "connect people to the nature, culture, and spirit of the dynamic river landscape at the birthplace of Minneapolis." We endorse the comments submitted by the City of Minneapolis and Friends of the Falls who also oppose full disposition of the Upper Lock.

Integrity of the Upper Lock

NLNA is not aware of any public entity interested or capable of taking over the Corps' responsibilities for flood control and maintenance at the Upper Lock. Allowing a private entity to take over the Corps' responsibilities raises serious questions regarding the capacity of any non-government entity to maintain routine operations, much less the ability to fund and oversee any needed repairs should something go wrong. To preserve



the integrity of the Upper Lock and its functions of supporting water supply and flood mitigation, the Corps should continue to own and maintain the Lock.

#### Connecting People to the Falls

The lock structure itself, particularly the top of the lock walls, allows the public to get close to the Falls, and it is also key to interpreting the navigational history of the central riverfront. Land surrounding the facilities not required to fulfill flood control and maintenance functions is important to connect people to the river. This land should be transferred as soon as possible to the City of Minneapolis or its designee, as directed by Congress in the Water Resources Development Act of 2020. The Corps must not block meaningful public use of this site envisioned by Regional Park Master Plan goals to connect people to the natural and cultural resources of this area.

NLNA urges the Corps to abandon its stated recommendation to fully dispose of the property and work instead with the City of Minneapolis to ensure partial disposition that will support and enhance goals for improvements intended to make the lock and dam site a vibrant hub connecting people to the Mississippi River.

Thank you for the opportunity to submit these comments.

Sincerely,

David N. Crary  
Vice President NLNA,

**From:** [Patricia Lemm-Tabor](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Wednesday, March 17, 2021 7:06:24 AM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Patricia Lemm-Tabor



**From:** [Pat Whebbe](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 10:26:07 PM

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Dear Engineers U.S. Army Corps,

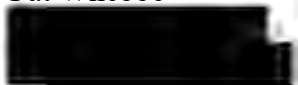
I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Pat Whebbe





District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
[mpllocksdisposition@usace.army.mil](mailto:mpllocksdisposition@usace.army.mil)

Dear Jonathan Sobiech and Nan Bischoff:

The Native American Community Development Institute (NACDI) submits this letter in response to the U.S. Army Corps of Engineers Upper St. Anthony Falls Lock and Dam Disposition Study draft report, released January 20, 2021.

Founded in 2007, NACDI works to address the growing challenges and opportunities facing the urban Indigenous community. We help Native people create the future they envision. Our work is founded on the belief that all American Indian people have a place, purpose and a future *strengthened* by sustainable community development.

NACDI has a contract relationship with Friends of the Falls. We are the organization's community engagement partner, helping the staff and board build authentic, reciprocal and long-term relationships with First Nations people. Together, we are creating a framework that lets Indigenous Peoples guide decision making and develop a true shared vision for Owámmiyomni, the Falls.

We support the City of Minneapolis and Friends of the Falls' efforts to create a community gathering place at the Upper Lock centered on Native voices. And we commend Congress for directing the Army Corps to convey excess property at the site to the City or its designee for public use "as soon as practicable" (Section 356, Water Resources Development Act of 2020, signed into law on December 27, 2020).

**NACDI urges the Army Corps to expedite its implementation guidance for WRDA 2020 and quickly convey requested property to the City of Minneapolis or its designee.** It is crucial that we can communicate to Tribal Leadership, the Indigenous community and the public at large that there is an expeditious path to site control in order to advance concept designs and operations assessments for the project.

**NACDI also urges the Army Corps to abandon its recommendation of Alternative 1a, or full disposal of the Upper Lock with monetary incentive to a new owner. We are strongly opposed to full disposition of the property.**



NACDI Page 2

We are aware of no non-federal entity with the expertise and capacity to fully acquire the Lock and assume associated flood mitigation responsibilities. And while the Army Corps seeks such a buyer, it restricts the City and Friends of the Falls' ability to engage the community, secure funding for future improvements and successfully revitalize adjacent property.

Furthermore, Lock operations and maintenance should not be in the hands of a private entity. Should anything go wrong, we do not have confidence that a private, non-government entity would have the wherewithal to manage and pay for repair and recovery.

The Army Corps built the Lock on Dakota homeland. It further desecrated the sacred Falls and Spirit Island, sites that are sacred to Indigenous Peoples. And now the Corps is looking to abandon the property. The Corps must accept its ongoing maintenance responsibility and support the community's efforts to honor and reinstate this Native land.

Sincerely,

Robert Lilligren, President & CEO  
Native American Community Development Institute  
(White Earth Ojibwe)  
1414 East Franklin Avenue  
Minneapolis, MN 55404  
612-284-1091  
[rlilligren@nacdi.org](mailto:rlilligren@nacdi.org)  
[www.nacdi.org](http://www.nacdi.org)



NACDI Page 3

**NACDI Board of Directors:**

**Executive Committee:**

**Chair:** Sam Olbekson/Architect, Cunningham Group/Tribal Affiliation: White Earth Band of Ojibwe

**Secretary:** Christine McDonald/American Indian Community Specialist, City of Minneapolis/Tribal Affiliation: Lac Courte Oreilles Band of Lake Superior Chippewa

**Treasurer & Finance Committee Chair:** Beverly Busyhead/Propel Nonprofits (formerly)/Tribal Affiliation: Eastern Band of Cherokee Indians

**Board of Directors:**

Joe Hobot/President & CEO American Indian OIC/Tribal Affiliation: Hunkpapa Lakota

Peter McLaughlin/4<sup>th</sup> District Hennepin County Commissioner/No Tribal Affiliation

Mihailo Temali/CEO Neighborhood Development Center/No Tribal Affiliation

Heid Erdrich/Community Artist and Poet/Tribal Affiliation: Turtle Mountain Anishinaabe

Deanna Standing Cloud/Program and Community Network Director, Tiwahe Foundation/Tribal Affiliation: Red Lake Ojibwe

**From:** [Robert Milligan](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 3:50:11 PM

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Dear Engineers U.S. Army Corps,

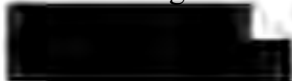
I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Robert Milligan

A black rectangular redaction box covering the signature area.

**From:** [Rudy Niemiec](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 6:41:33 PM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

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Regards,  
Rudy Niemiec





VIA EMAIL

District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
[mplslocksdisposition@usace.army.mil](mailto:mplslocksdisposition@usace.army.mil)

March 17, 2021

**Re: Comments of the St. Anthony Falls Alliance Regarding the Upper St. Anthony Falls Lock Disposition Study Draft Report Re-Issued January 20, 2021**

Dear Jonathan Sobiech and Nan Bischoff:

The St. Anthony Falls Alliance (SAFA) submits this letter in response to the request for public comment regarding the USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft report, first released December 16, 2020, and re-issued January 20, 2021.

Established in 2014 to facilitate a unified approach to protecting and enhancing the amenities and aesthetics of the Minneapolis central 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 comments dated October 19, 2019, SAFA asked the US Army Corps of Engineers ("the Corps") to consider and be consistent with the Minneapolis Park and Recreation Board's Master Plan for the Central Mississippi Riverfront Regional Park ("Regional Park") in its work on the Upper St. Anthony Falls Lock Disposition Study. Based upon the vision and goals of the Regional Park Master Plan, SAFA urged a focus on partial disposition and opportunities for coordination with the City and the Minneapolis Park and Recreation Board to further local adopted plans for the central riverfront.

SAFA is opposed to the Corps' recommendation of full disposition of the Upper Lock with monetary incentive because it risks the integrity of the lock structure and threatens implementation of the Regional Park Master Plan Vision to "connect people to the nature, culture, and spirit of the dynamic river landscape at the birthplace of Minneapolis." We

endorse the comments submitted by the City of Minneapolis and Friends of the Falls who also oppose full disposition of the Upper Lock.

### Integrity of the Upper Lock

SAFA is not aware of any public entity interested or capable of taking over the Corps' responsibilities for flood control and maintenance at the Upper Lock. Allowing a private entity to take over the Corps' responsibilities raises serious questions regarding the capacity of any non-government entity to maintain routine operations, much less the ability to fund and oversee any needed repairs should something go wrong. To preserve the integrity of the Upper Lock and its functions of supporting water supply and flood mitigation, the Corps should continue to own and maintain the Lock.

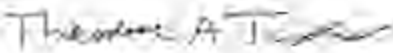
### Connecting People to the Falls

The lock structure itself, particularly the top of the lock walls, allows the public to get close to the Falls, and it is also key to interpreting the navigational history of the central riverfront. Land surrounding the facilities not required to fulfill flood control and maintenance functions is important to connect people to the river. This land should be transferred as soon as possible to the City of Minneapolis or its designee, as directed by Congress in the Water Resources Development Act of 2020. The Corps must not block meaningful public use of this site envisioned by Regional Park Master Plan goals to connect people to the natural and cultural resources of this area.

SAFA urges the Corps to abandon its stated recommendation to fully dispose of the property and work instead with the City of Minneapolis to ensure partial disposition that will support and enhance goals for improvements intended to make the lock and dam site a vibrant hub connecting people to the Mississippi River.

Thank you for the opportunity to submit these comments.

Sincerely,



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

**From:** [Scott Smith](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Lock 1 ownership  
**Date:** Sunday, February 21, 2021 9:22:58 PM

---

Hello ACoE,

Please maintain ownership of our beloved lock and dam #1.

I have lived in NE MPLS for 28 years. We have spent many many hours boating on the upper Mississippi. Until 2015 we used the lock and dams from the water and from the bridge. You guys have done such a great job maintaining the lock and dam. The people working the lock always gave us good advice and knew the river in that area so well. We raised our kids in this area and have always enjoyed the seasons on the river near the dam. Please keep up the good work.

If you want to share the responsibility of the ownership please consider selling off the land around the lock and dam and continue running and maintaining the structure. Someday, the carp problem might be solved and we will have access to the lock systems again.

Thanks for all the years of recreation and a well maintained piece of Minneapolis history. We need and want you to stay in NE MPLS!

-Scott Smith



**From:** [Seymour Gross](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 5:36:47 PM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Seymour Gross



**From:** [Stephen Wernersbach](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 8:08:41 PM

---

Dear Engineers U.S. Army Corps,

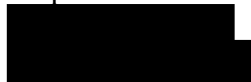
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Regards,  
Stephen Wernersbach





March 18, 2021

St. Paul District, U.S. Army Corps of Engineers  
Nan Bischoff, at 651-290-5426  
MplsLocksDisposition@usace.army.mil  
ATTN: Regional Planning and Environment Division North  
180 5th St. E., Suite 700  
St. Paul, MN 55101  
651-290-5426

Subject: St. Anthony Falls Disposition Public Comments

Dear Ms. Bischoff,

These are my comments on the St. Anthony Falls disposition. Please include in the public record.

As a Master of Business Administration student at the Vienna School of Economics, in Vienna, Austria in September of 2009, I learned that the way cities and communities form, is generally of great cultural and heritage interests to society. Revealing the reason communities exist is a source of identity and enormous community pride. That founding story can be a source of heritage festivals and tourism as it commonly is in Europe.

I was born and raised on a family farm, in Lac Qui Parle County. When I returned to the United States from Vienna, I decided to learn the story of Minneapolis, Minnesota. What I discovered is St. Anthony Falls is the reason Minneapolis and the Twin Cities metro exists as it does today. Minneapolis's streets, roadways, buildings, culture, businesses, and architecture are all were all shaped and defined by St. Anthony Falls.

As industrialization and economic interest pushed aside Native Americans who had lived at St. Anthony Falls forever, and dismissed the interests of non-privileged working class, St. Anthony Falls was overrun and destroyed.

The natural question is: what if history could be undone?

What if St. Anthony Falls could be restored to what it looked like to Native Americans before Father Hennepin arrived? Would that be even worth considering or doing? Based on learning in my MBA studies at Vienna University, home of 14 Nobel laureates, the Austrian School of Economics and alumni including Joseph Schumpeter, Fredrick Hayek, and Sigmund Freud, I decided to figure it out.

Figure 1 below shows an artist's rendering of St. Anthony Falls, and there are several other historic paintings of this type. But that example is sufficient for this discussion. The harsh industrialized appearance of St. Anthony Falls today clearly bears no resemblance to the wonder of what once was.



Figure 1



Table 2 below is a list of the largest waterfalls in the world ranked by river flow and water fall width. By this measure, St. Anthony Falls is the 17<sup>th</sup> largest waterfall worldwide. Clearly having a showcase natural resource, the 17<sup>th</sup> largest waterfall in the world, restored to its unaltered natural wonder is worth serious discussion. And to be located the city center of the Twin Cities metro would be an interesting proposition. No other community worldwide could have such a spectacular place.

The Twin Cities, a world class community, is home to 4 million people and is the 16<sup>th</sup> largest Combined Statistical Area in the United States. But beyond that, can a business case be made to quantify the net economic benefit of restoring St. Anthony Falls?

To answer that question, please refer to Table 1 below. It is a peer group list of waterfalls with the size, flow, height, and natural appearance. Also included in the table is the population located regionally, nationally, and the travel distance to the waterfall. When we travel to places, we make decisions on where to travel based on a budget. Having a remarkable natural attraction located in the center of a world class city is interesting to visitors. Because if they travel to the natural attraction located in the center of 4 million people, as a bonus, they can visit many other attractions at extremely low travel cost. This fact is important.

Next, annual visitors to each waterfall were obtained from legitimate sources of information. For example, the visitor data from Sioux Falls was obtained from the Director of Parks in Sioux Falls, South Dakota. The National Park Service provided data from visitors to Yosemite Falls. The City of Niagara Falls provided data on visits to Niagara Falls.

Following that, an index was created to rank the appearance of what St. Anthony Falls looks like now and how much more appealing it could be if a world class landscape architect designed and

**STEVEN R. GRESETH, M.B.A., P.E.**



restored St Anthony Falls to look like it does in the picture above. All the industrial blight would be gone forever.

Lastly, based on that restored and remarkable appearance, and the width of the St Anthony Falls, the average flow of the Mississippi River, the height of the St Anthony Falls, and proximity of major urban centers to St. Anthony Falls, how many visitors would be attracted? Based on the peer group, the answer is 6 million visitors per year.

Based on visitor spending data provided by the National Park Service the net economic impact of those 6 million visitors is \$1,064,000,000 per year.

The Disposition Study provided by the Corps of Engineers says that a stilling basin would be required to dissipate the energy from a restored St Anthony waterfall as shown in the picture above. Such a basin would require deep foundations for proper support. I agree with that.

What I do not agree with is, dismissing the benefits of restoring St Anthony Falls based only on speculated costs and before quantifying the benefits.

If the deep foundations and reconstruction St Anthony Falls costs \$500 million, the payback in year one is a \$500 million. If it costs \$1 billion, the payback is in one year. Based on current discount rate of 4% the net present value of the annual benefit of \$1,064,000,000 per year is \$25 billion.

Certainly, these substantial economic benefits merit deeper analysis and discussion of the possibilities. To calibrate this model and to record the increase in visitors, the 56-foot-wide lock chamber could renovated as shown in figure 2 below.

Soil placed in large planters a top the 10-foot-wide walls and vines draped down would mask the 400-foot-long lock chamber walls. Verdant maple, pine and oak trees greening the space to conceal the unnatural and non-artistic nature of the concrete sepulcher.

To gain the full cultural benefits of the site, the blighted, harsh nature of the current lock structure would need to be addressed, greatly enhanced, and transformed. After a few years of study, and design, the next phase of reconstruction could begin to restore the 2,000-foot arched St Anthony Falls - spanning the entire Mississippi River.

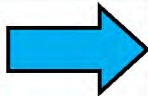
Table 1

Parameter	North American Waterfall Peer Group								
	Yosemite Falls	St. Anthony Falls	Horseshoe Falls, Canada	American Falls, New York	Cumberland Falls	Falls of the Ohio	River Falls, Wisconsin	Rideu Falls, Ottawa, Canada	Big Sioux Falls
Existing Waterfall Height (ft)	2,425	49	167	167	68	23	32	37	25
Average River Flow (cfs)	1,700	16,000	45,997	18,753	3,600	128,000	102	650	1,050
Existing Falls or River Width (ft)	93	900	2,600	1,060	125	700	170	500	100
Current Natural Setting	92	6	70	70	95	10	6	55	85
Current Waterfall Index	31,893,136	991,877	50,071,927	20,413,939	1,662,760	2,407,505	12,778	318,695	231,746
MSA Size & Regional Proximity Factors	3.20	123	6.02	6.02	2.48	54	40	33.52	9.30
Mean Population Center Distance	1,889	587	886	886	541	379	600	1,080	599
Model Match Factor	29	29	29	29	29	29	29	29	29
Current Tourists Per Year	2,281,512	500,000	20,601,093	8,398,907	1,000,000	400,000		3,000,000	1,000,000
Model Estimate of Current Tourism	1,567,844	6,050,018	9,882,852	4,029,163	220,975	5,865,271	24,704	287,323	104,491
Local Resident Visitor Contribution	60%	60%	60%	60%	60%	60%	60%	60%	60%
Non Local Domestic Visitors	28%	28%	28%	28%	28%	28%	28%	28%	28%
International Visitor Contribution	12%	12%	12%	12%	12%	12%	12%	12%	12%
Local Resident Spending / Person / Day	\$ 6.50	\$ 6.50	\$ 6.50	\$ 6.50	\$ 6.50	\$ 6.50	\$ 6.50	\$ 6.50	\$ 6.50
International Spending / Person / Day	\$ 202	\$ 202	\$ 202	\$ 202	\$ 202	\$ 202	\$ 202	\$ 202	\$ 202
Domestic Spending / Person / Day	\$ 42	\$ 42	\$ 42	\$ 42	\$ 42	\$ 42	\$ 42	\$ 42	\$ 42
Current River & Waterfall Tourist Spending Per Year	\$ 91,032,341	\$ 19,950,000	\$ 821,983,607	\$ 335,116,393	\$ 39,900,000	\$ 15,960,000	\$ 15,960,000	\$ 119,700,000	\$ 39,900,000
Seasonal & Tourism Reduction above 265k cfs Ohio River flow	0%	0%	0%	0%	0%	42%		0%	0%
Waterfall Height (ft)	2,425	60	175	175	68	37	32	37	25
Future Falls or River Width (ft)	93	1,900	2,600	1,060	125	11,320	170	500	100
Future Natural Setting	92	88	70	70	95	88	88	70	85
Future Waterfall Index	424,398	168,890	616,505	314,548	46,304	519,349	4,603	15,132	10,562
Future Tourists	2,281,512	26,669,706	20,601,093	8,398,907	1,000,000	9,915,341	23,730	3,000,000	1,000,000
Future Tourist Spending; Park Visitors, Rafting, Fishing, Kayaking, Theater, Music, Culture	\$ 91,032,341	\$ 1,064,121,287	\$ 821,983,607	\$ 335,116,393	\$ 39,900,000	\$ 395,622,107		\$ 119,700,000	\$ 39,900,000
Future Net	\$ 91,032,341	\$ 1,064,121,287	\$ 821,983,607	\$ 335,116,393	\$ 39,900,000	\$ 344,622,107		\$ 119,700,000	\$ 39,900,000
Reduction in Hydro Power	\$ -	\$ -	\$ -	\$ -	\$ -	(\$35,040,000)		\$ -	\$ -
Net Economic Improvement per Year		\$ 1,064,121,287							



Table 2

Worlds Largest Waterfalls						
Rank	Name	Flow c.f.s.	Width ft	Flow x Width	River Name	Country - City
1	Livingstone, Chutes de	1,240,000	15,840	19,641,600,000	Congo River	Congo
2	Khone, Chutes de	410,000	35,376	14,504,160,000	Mekong River	Laos
3	Inga Falls	1,500,000	5,000	7,500,000,000	Congo River	Congo
4	Guaíra, Salto del	470,000	15,840	7,444,800,000	Rio Paran	Brazil
5	Boyoma Falls	600,000	4,500	2,700,000,000	Lualaba River	Congo
6	Par, Salto	125,000	18,400	2,300,000,000	Rio Caura	Venezuela
7	Falls of the Ohio	128,000	11,320	1,448,960,000	Ohio River	Louisville - USA
8	Celilo Falls	191,215	6,300	1,204,654,500	Columbia River	USA
9	Urubupunga, Salto do	97,000	6,600	640,200,000	Rio Paran	Brazil
10	Iguacu, Salto de	61,660	8,858	546,184,280	Rio Igua	Argentina / Brazil
11	Patos e Maribondo, Saltos dos	53,000	6,600	349,800,000	Rio Grande	Brazil
12	Niagara Falls	85,000	3,948	335,580,000	Niagara River	USA / Canada
13	Kongou Falls	31,783	10,500	333,721,500	Ivindo River	Gabon
14	Victoria Falls	38,430	5,700	219,051,000	Zambezi River	Zimbabwe / Zambia
15	Cauvery Falls	33,000	2,784	91,872,000	Cauvery River	India
16	Williamette Falls	30,849	1,550	47,815,950	Willamette River	USA
17	<b>St Anthony Falls</b>	16,800	1,800	30,240,000	<b>Mississippi River</b>	<b>Minneapolis - USA</b>
18	Virginia Falls	35,300	850	30,005,000	South Nahanni River	Canada
19	Ruacana Falls	10,000	2,280	22,800,000	Cunene River	Namibia / Angola
20	Sandstone Falls	7,847	1,500	11,770,500	New River	USA



**STEVEN R. GRESETH, M.B.A., P.E.**



*Figure 2*



Once the wonder of St. Anthony Falls is revealed again, and all the public has equal standing as a stake holder, I believe that the electric utility would relinquish their upstream claim to the site so that the entire area around St Anthony Falls could be restored to appear natural once again, as it did 300 years ago.

Based on this study, I believe the best entity to own the St. Anthony Falls site is the City of Minneapolis, Hennepin County, or the State of Minnesota. Local ownership of St. Anthony Falls and the awareness that St. Anthony Falls is the sole reason for the existence of the Twin Cities metro will ensure that the site is preserved, celebrated as culturally significant, and shared to maximize the greatest good for the greatest number of people.

Thank you very much for the opportunity to provide input to such a significant and culturally important place.

Very sincerely yours,

*Steven R. Greseth*

Steven R. Greseth

cc.

President Joe Biden

Governor Tim Walz

Senator Amy Klobuchar

Senator Tina Smith

U.S. Representative Ilhan Omar

U.S. Representative Betty McCollum

U.S. Representative Dean Phillips

Minnesota State Legislature

City Council of Minneapolis

Hennepin County Commissioners

Minneapolis Park and Recreation Board

Friends of the Falls

American Currents, Konrad Schmitt

**From:** [Stu Farnsworth](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 6:28:52 PM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Stu Farnsworth



**From:** [Sue Olson](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 8:24:11 PM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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Regards,  
Sue Olson

A black rectangular redaction box covering the signature area.

**From:** [Susan Imker](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 12:50:06 PM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

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Regards,  
Susan Imker



**From:** [Susie Marty](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 4:40:50 AM

---

Dear Engineers U.S. Army Corps,

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For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Susie Marty



**From:** [Sydney Foster](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 5:17:56 AM

---

Dear Engineers U.S. Army Corps,

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With Current threats to the health of our waters, especially with Line 3 potentially crossing the Mississippi, the safety of our water sources is a real threat to our health and safety.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

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Regards,  
Sydney Foster



**From:** [Tanya Koester](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 16, 2021 8:39:12 AM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

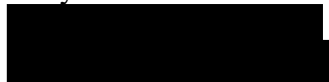
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Look

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Regards,  
Tanya Koester



**From:** [Teresa Schneider](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Tuesday, March 23, 2021 1:47:00 AM

---

Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Teresa Schneider



**From:** [Teresa Weum](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 10:19:50 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. I believe it is beneficial that it continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Teresa Weum



**From:** [Timothy Donovan](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 6:20:42 PM

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Dear Engineers U.S. Army Corps,

I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Timothy Donovan



**From:** [David Tinjum](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Army Corps Disposition Study for the Upper Lock  
**Date:** Monday, March 15, 2021 5:57:09 AM

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To whom it may concern,

It is mind-boggling that it has taken 6 years, multiple federal laws and unanimous pressure from involved Minnesota members of Congress to advance the simple conveyance of a site the size of a postage stamp.

Many have weighed in on the value of repurposing the Upper Lock, with ideas like a Native American interpretive center, a marina, green space, walking trails, a visitor center and space for meditation.

The Army Corps' intent to find a new owner and walk away from the Lock - without first conveying this adjacent real estate - would guarantee this strategic river site lies fallow for many years.

Friends of the Falls, the Native American Community Development Institute, justice advocates and the general public await an outcome that protects the public interest and empowers the community to determine the best future of this site.

I would like the US Army Corps of Engineers to continue owning and maintaining portions of the Upper St. Anthony Falls lock.

Respectfully,

David Tinjum

Publisher, Mill City Times



March 17, 2020

District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
Saint Paul MN 55101

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

**RE: Upper St. Anthony Falls Lock and Dam Disposition Study Draft Report**

Dear Jonathan Sobiech and Nan Bischoff:

Thank you for the opportunity to comment on the USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft report, reissued January 20, 2021. The Minneapolis Parks Foundation and our stakeholders have a vested interest in the future of the Upper St. Anthony Falls Lock and Dam (USAF) with the imminent opening of the Water Works Park Pavilion and expansion of Mill Ruins Park. As such, we are opposed to the Army Corps' intention to recommend full disposition of the USAF and urge USACE to instead adopt a partial disposition. We support the direction outlined by Congress through the Water Resources Development Act (WRDA) for a partial disposition to ensure public access on and around the site, while maintaining maintenance and operations of the dam to maintain safe water levels in the pool above the Dam and Falls.

Water Works Park Pavilion and expansion of Mill Ruins Park is a \$30 million transformative community-led and philanthropically funded park project that will bring significant new historic, cultural, and recreational amenities to the central riverfront adjacent to the USAF; The Water Works 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 phase 1 opens to the public within weeks of the date of this letter.

As an independent, community-supported nonprofit that helps transform human life through parks and public space, the Parks Foundation urges the Army Corps to prioritize:

- **Public ownership of vital infrastructure.** One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport and other essential entities depend on the Upper lock for its water supply. If the Corps were to absolve itself of any responsibility for the lock, the threat to our community's basic infrastructure would be catastrophic. Because the lock and dam are so closely related, and because the implication of a failure of operations is so great, it is unrealistic to expect that a non-federal agency would assume this responsibility.
- **Public access to vital amenities and natural resources.** Any future action at USAF should prioritize the community's desire to connect with the Mississippi River, St. Anthony Falls, the only natural waterfall on the River, and the Stone Arch Bridge, one of the most visible and iconic destinations in Minnesota. 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.

For these reasons, it is our opinion that the USACE pursue partial disposition of land around the USAF and nonessential features of the Upper Lock at St. Anthony Falls to another public or nonprofit partner. We respectfully ask the USACE to follow the direction outlined by Congress in the 2020 Water Resources to update its draft recommendations. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Tom Evers".

Tom Evers - Executive Director

**From:** [sory tavage](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Upper st Anthony lock  
**Date:** Tuesday, January 26, 2021 5:43:05 PM

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Hi,

I'm not sure if this is the place to submit my small 2 cents, but here it is...

I'm a Minneapolis local and boat owner. I currently have a larger vessel located in inver grove heights and all is boat owners talk about is we wish the lock was open to explore past the lock in Minneapolis. With new developments happening, I think this would be extremely beneficial to have recreational traffic once again! As someone who has used this lock as a child and seen it open and watched large boats travel through Minneapolis it is something I miss very much. There are thousands of boater that wish for the opening of the lock and support this thought after all of the research that has been done. We just wish to have a voice and the last thing I would like to see is the destruction or repurpose of the lock that does not account for boaters.

Thanks,  
~Tony

Sent from my iPhone

**From:** [Toya López](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Cc:** [info@thefalls.org](mailto:info@thefalls.org)  
**Subject:** [Non-DoD Source] Upper Anthony Falls Lock and Dam Disposition Comment  
**Date:** Thursday, March 18, 2021 6:35:08 PM

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Dear Jonathan Sobiech and Nanette Bischoff:

I'm writing in response to the Upper St. Anthony Falls Lock and Dam Disposition Study draft report, issued January 20, 2021.

I am opposed to the Army Corps' recommendation to fully dispose of the Upper Lock. I understand that commercial navigation is no longer a main function of the facility, but infrastructure of this magnitude should be managed in the public interest by a public entity, rather than sold to the highest bidder. There IS an ongoing federal interest in this site.

At its public meeting on March 3, I was alarmed to hear that an Army Corps representative said it would not be a federal concern – only a local and regional one- if there was a water shortage or flood damage due to a failure of the Upper Lock and Dam. The Army Corps cannot abandon its maintenance responsibilities and simply 'hope' a responsible party will come forward to take its place.

The Army Corps must continue to own and maintain the Lock. It should also comply with WRDA 2020 and transfer surrounding property to the City of Minneapolis or its designee for public use.

Sincerely,

Toya López

A member of the Elliot Park Neighborhood, Inc. Board of Directors

Building, Land Use and Housing Committee

A member of the City of Minneapolis, Community Environmental Advisory Committee

**Toya López, MHA, ISSP-SA, LEED Green Associate**

[Director of Operations](#)

[Health Professionals for a Healthy Climate](#)

[Redacted Signature]



Please consider the environment before printing this e-mail

**From:** [Tracy Ottenstroer](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Support for the Corps to keep the Upper St. Anthony Falls Lock  
**Date:** Monday, March 15, 2021 7:35:12 PM

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Dear Engineers U.S. Army Corps,

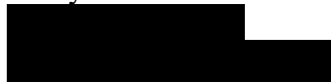
I'm concerned about the future of the Upper St. Anthony Falls Lock in Minneapolis. This critical lock serves many essential functions as well as being a recreational asset in our community. It must continue to be owned and maintained for the benefit of the public.

The U.S. Army Corps of Engineers built the lock structure, has the expertise to operate it and therefore should continue to own and manage the lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam for all of our safety. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport, depend on the lock for its water supply. The Corps should not absolve itself of these critical management responsibilities and walk away. No other viable owner exists that would keep the site for public use and benefit.

The site also sits next to the only major falls on the Mississippi River in an area that sees over two million visitors a year within the Mississippi National River and Recreation Area. There is widespread community support for increased public use and river access at this site. To further that goal, the Corps should transfer the surrounding land not needed for lock operations to the City of Minneapolis to ensure continued public access.

For these reasons, I urge the Corps to abandon its proposal to walk away from the site. Instead, the Corps should transfer some of the land for public access while retaining permanent ownership of the remaining property.

Regards,  
Tracy Ottenstroer



# UNIVERSITY OF MINNESOTA

*Crookston • Duluth • Morris • Rochester • Twin Cities*

**Planning, Space, and Real Estate**  
*University Services*

*451 Donhowe Building  
319 15<sup>th</sup> Avenue SE  
Minneapolis, MN 55455  
Office: 612-625-5345*

March 18, 2021

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

Nan Bischoff  
St. Paul District  
U.S. Army Corps of Engineers  
ATTN: Regional Planning and Environment Division North  
180 5th St. E., Suite 700  
St. Paul, MN 55101

Ms. Bischoff,

The University of Minnesota (the University) appreciates the opportunity to comment on the “Upper St. Anthony Falls Lock and Dam Section 216 Disposition Study: Draft Integrated Disposition Report and Environmental Assessment,” revised January 2021 (the Study). The broadest possible objective of the study, to better understand how the disposition of the dam can contribute positively to the human and recreational environments around the Mississippi River, is commendable. However, the University has serious concerns with the Study’s Tentatively Selected Plan (TSP), “Alternative 1a, Complete Deauthorization and Disposal combined with a monetary incentive for expediting the disposal,” due to these primary reasons:

1. **transfer of ownership** to an entity/organization with unknown qualifications and capacity to operate and maintain the property; and
2. **potential adverse effects** to University facilities during flood flows due to any changes in operation of the upper lock’s Tainter gate which historically has mitigated flood impacts.

To respond to both concerns, the University requests that the Corps include in the terms of conveyance of the property and facilities a covenant or similar requirement obligating the receiving party or parties to continue to operate the upper lock Tainter gate for flood mitigation purposes, or to otherwise provide mitigation acceptable to affected parties; and to maintain the property consistent with Corps standards to ensure adequate structural stability and function.

Following is more detail regarding University concerns.

## **Transfer of Ownership**

Consistent with letters of comment from other stakeholders in 2018 and 2019, the University recognizes the Corps as uniquely qualified to own, maintain and operate the lock. The study does not indicate whether prospective new owner/s would be required to demonstrate technical competence and financial capacity to maintain and operate the lock reliably. The proposed transfer of ownership raises concerns of potential serious risks to the University’s St. Anthony Falls Laboratory (SAFL).

Such concerns would be addressed if transfer of ownership were considered only after these steps are completed:

- 1) A rigorous process to certify that a prospective receiving party is qualified technically and financially to operate and maintain the lock indefinitely; and

2) Consultation with adjacent property owners including the University, Xcel Energy, Minneapolis Park & Recreation Board and the City of Minneapolis.

### **Potential Adverse Effects During Flood Flows**

The lock, specifically the operation of the upper lock Tainter gate, serves an important function in managing flood flows to mitigate impacts to adjacent properties and structures. Regardless of future ownership of the property, that function should continue or otherwise be mitigated given the significant impact that could be experienced by those adjacent to the property as well as the Upper and Intermediate Pools. If the Corps does dispose of the property, the receiving party or parties should be obligated to continue to maintain and operate the lock's Tainter gate to mitigate flood flows and related impacts on properties up- and downriver. Though the Corps' central mission in the study area is navigation, passage of extreme floods has been an essential function and in fact is the reason this lock has an adjustable Tainter gate. Flooding in the basement level of SAFL would be exacerbated should additional flood flow be allowed across the horseshoe dam and under the historical Stone Arch Bridge footprint, which excludes the truss section.

The origin and operation of the upper lock Tainter gate is summarized in the *Water Control Manual, Upper and Lower St. Anthony Falls Locks and Dams*, (USACE, Mat 2004):

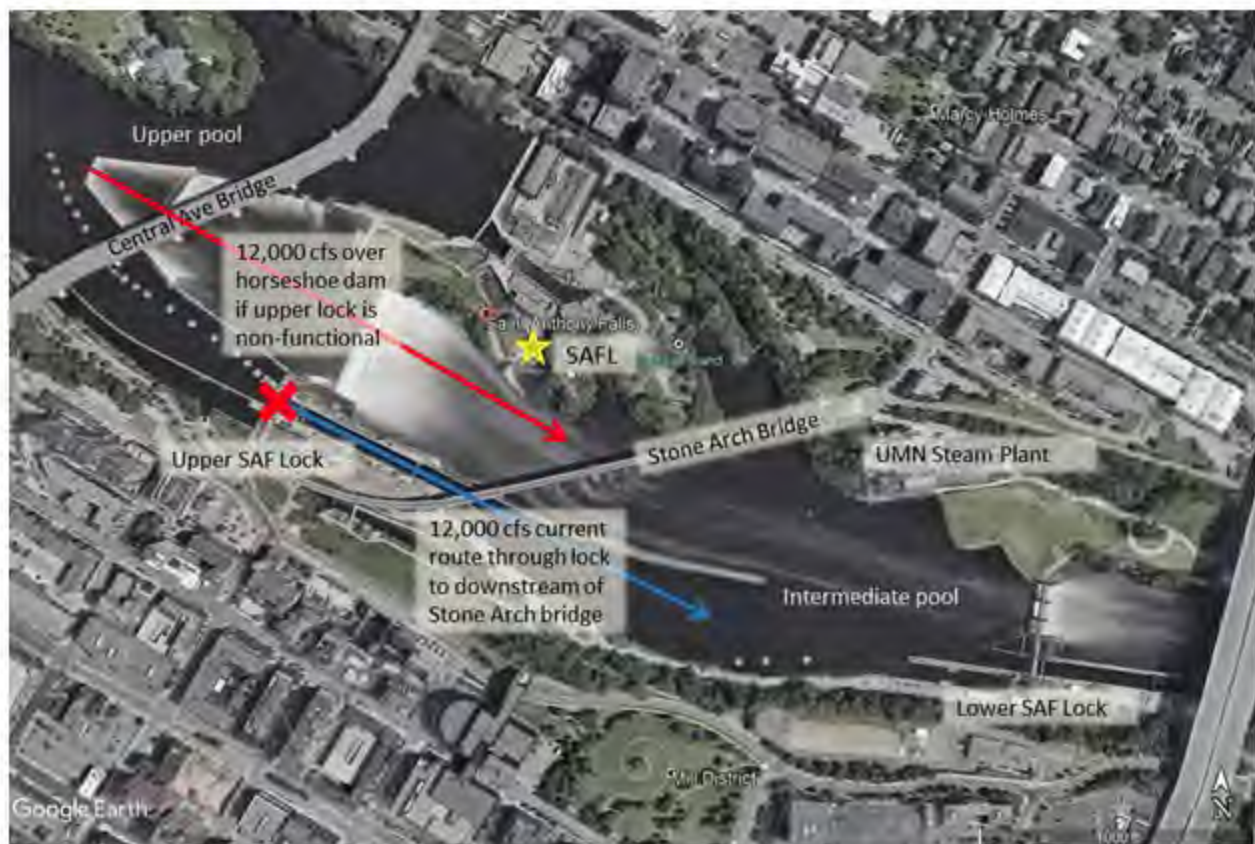
***“Upper Lock Tainter Gate. To increase depths and reduce cross currents in the lock approach, a portion of the horseshoe dam was raised. This removed some of the flow capacity of the dam. The lock Tainter gate was introduced to the design plan to replace the lost flow capacity. ... Although not used very often, the continued maintenance and/or rehabilitation of the upper lock Tainter gate is necessary to provide a means of helping discharge flood waters during extreme events. The loss of spillway capacity at the horseshoe dam as a result of the construction of the lock as well as the loss of discharge capacity of Wasteways No. 1 and 2 require that the lock be used to discharge a portion of the river flow during extreme flood events.”*** (emphasis added)

The modified linear section of the horseshoe dam discussed below is located adjacent to the upstream approach to the upper lock. The requirement of the upper lock Tainter gate to mitigate lost horseshoe dam capacity because of navigation should impose constraints on transfer of ownership.

Continued competent operation of the lock's Tainter gate to discharge flood flows is essential to managing flood flow and levels in the Intermediate Pool. In addition to increased bank erosion, an increase in pool elevation and/or flow due to changes at either the upper or the lower lock and dam could result in additional backwater into the basement level of SAFL, which would damage research facilities and reduce research space. An example to illustrate the impacts is taken from the *Water Control Manual* cited above.

In the 1965 flood of record, the Tainter gate was activated and approximately 12,000 cubic feet per second (cfs) passed through the upper lock out of a total peak flow of 91,000 cfs (pp. 4-5, *Water Control Manual, Upper and Lower St. Anthony Falls Locks and Dams*, USACE, May 2004). If the upper lock Tainter gate were not operated during this flood event, this additional 12,000 cfs flow would have passed over the horseshoe dam (see Figure 1 below, red arrow), with the result of: a) raising flood levels and thus lowering the margin of flood protection in the Upper Pool, as noted in the quote above from the *Water Control Manual*, and; b) raising water levels in the portion of the Intermediate Pool between the main

spillway apron and the Stone Arch Bridge that is directly adjacent to SAFL, thereby increasing flood elevations in the basement of the SAFL building in extreme events. Although SAFL's basement's floor elevation (752.7 feet) is above the historical high Intermediate Pool elevation of 751.4 as measured at the Lower St. Anthony Fall Lock, the basement generally floods above 30,000 cfs. This is caused by water surface slope and back water from the Stone Arch Bridge.



**Figure 1.** If the upper lock Tainter gate does not function during flood flows (red X), the Upper Pool elevation will rise and significantly more flow will pass over the horseshoe dam. This will raise water levels at SAFL's outlet channel (star) in the upstream portion of The Intermediate Pool above the Stone Arch Bridge, exacerbating flood impacts to SAFL's basement level and outlet structures in large events.

### University facilities in the study area

Following are descriptions of University facilities adjacent to the Upper Pool and/or the Intermediate Pool. As described above, these would be at increased risk of adverse effects during flood flows in those pools if flood mitigation functions historically fulfilled by lock operations were to cease.

#### Saint Anthony Falls Laboratory

St. Anthony Falls Laboratory (SAFL) at 2 Third Street SE is an internationally recognized water hydraulics research laboratory located on the northeast bank of the St. Anthony Falls (the Falls) and

adjacent to both the Upper Pool and the Intermediate Pool. Research and research training at SAFL is intimately tied to the Mississippi River. Funding for this research is provided by federal, state and University sources. SAFL played an important role in the original design of the subject property by hosting the physical model studies of both the navigation and filling/emptying systems of the Upper St. Anthony Falls and Lower St. Anthony Falls locks.

The sole source of river water for SAFL operations is an intake structure that constitutes a small portion of the spillway dam structure. Flows of up to 300 cubic feet per second are used for mission-critical research. **Changes in functional capacity or operational protocols at the lock, without appropriate modification, would alter the elevation of water in the Upper Pool could damage SAFL's intake structures and ability to fulfill its research mission and may require an update to local flood risk assessments and associated flood protections measures and protocols.** 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 the intermediate pool elevation due to changes at either the upper or the lower lock and dam could divert additional backwater into SAFL, which would damage research facilities and reduce research space without modifications.**

#### District energy and steam heat production and distribution

The Twin Cities campus operates two energy plants within the study area: The Southeast Steam Plant at 600 Main Street SE is adjacent to the Intermediate Pool; the Main Energy Plant at 1180 Main Street SE is adjacent to Pool 1 between the Lower St. Anthony Falls Lock and Dam and Lock and Dam No. 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 level increases resulting from operational changes at the locks could cause river water and/or groundwater to enter these tunnels.

#### **Other University facilities adjacent to river pools beyond the scope of the current study**

The following University facilities are adjacent to Pool 1 between the Lower St. Anthony Falls Lock and Dam and Lock and Dam No. 1. This information is provided as context for the Study as well as for the anticipated disposition studies for the Lower St. Anthony Lock and Dam and Lock and Dam No. 1.

#### 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 provides 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. For such use it is critical that flows in Pool 1 are kept within a safe range below 30,000 cfs.

#### Elmer L. Andersen Library Caverns

The University's Elmer L. Andersen Library at 222 21st Avenue South includes archival storage caverns that 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 caverns are accessed via West River Parkway and were designed to avoid flooding during a 500-year flood; a groundwater drain and pump system installed around the perimeter prevents flooding from groundwater

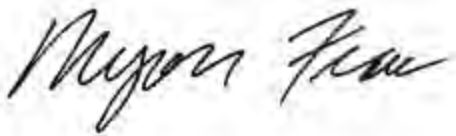
flow based on the river's conditions. Changes to flood levels in Pool 1 could increase risk of damage to these rare and valuable collections due to water infiltration into the caverns.

#### 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 Pool 1. Changes to flood levels or flows in Pool 1 could impact the structural stability and function of this critical infrastructure.

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. 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,

A handwritten signature in black ink, appearing to read "Myron Frans".

Myron Frans  
Senior Vice President for Finance and Operations

A handwritten signature in black ink, appearing to read "Matt Kramer".

Matt Kramer  
Vice President of University Relations

**From:** [Vachel Hudson](#)  
**To:** [DLL-CEMVP MPLS LOCKS Disposition](#)  
**Subject:** [Non-DoD Source] Lock Dam  
**Date:** Thursday, March 18, 2021 6:46:48 PM  
**Attachments:** [Outlook-ktweoopf.png](#)

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To whom this may concern,

I urge the Army Corps to continue to own the Lock Dam and urge them to sell any property around the Lock to the residents of Minneapolis!

**Vachel Hudson | Housing & Financial Capabilities Manager**

**Wealth Development**

Urban League Twin Cities

2100 Plymouth Avenue North, Minneapolis, MN 55411

612.302.3141 | [vhudson@mul.org](mailto:vhudson@mul.org) or [vhudson@ultcmn.org](mailto:vhudson@ultcmn.org)



**Urban League**  
Twin Cities



District Engineer, St. Paul District, Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
[mplslocksdisposition@usace.army.mil](mailto:mplslocksdisposition@usace.army.mil)

Dear Jonathan Sobiech and Nan Bischoff:

Webber-Camden Neighborhood Organization submits this statement in response to the request for public comment regarding the USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft report, first released December 16, 2020, and re-issued January 20, 2021.

My name is Sheree Breedlove, and I am the Chair of Webber-Camden Neighborhood Organization. I am writing this letter on behalf of and with the support of the WCNO Board.

WCNO has long supported a comprehensive approach to riverfront development and thoughtful planning of parks, commercial districts and residential communities near our city's greatest natural asset – the Mississippi.

The Upper Lock at St. Anthony Falls is key to the revitalization of the Minneapolis central riverfront. It will enhance the livability of neighborhoods both up and down river, including in our neighborhood of Webber-Camden.

The Falls is also an imminently sacred site to the Dakota people and other Indigenous communities. The area has been desecrated from the first days of European settlement and industrialization. Now closed to commercial navigation, the Lock presents an opportunity to acknowledge this painful history and create a place and program centered on Native voices.

Webber-Camden Neighborhood Organization is opposed to the Army Corps' recommendation of full disposition of the Upper Lock with monetary incentive.

With over one million Twin Citians relying on the Upper Pool for water supply, including the City of Minneapolis, City of Saint Paul and the Minneapolis Airport Commission, we cannot leave vital oversight of this infrastructure to unproven parties. It would be a regional and federal disaster to lose the St. Anthony Falls reservoir due to a failure of the dam or the cutoff wall that exists under the river – and the Lock is intrinsically tied to the dam.

The Corps should continue to own and maintain the Lock, reliably supporting water supply and providing flood mitigation responsibilities.



Excess land that is not necessary for these functions, however, should be quickly transferred to the City of Minneapolis or its designee for public use. This simple action was already directed by Congress in the Water Resources Development Act of 2020 and requires no further study.

The USACE must not stand in the way of meaningful public use of this site in line with historic preservation, neighborhood and Congressional goals for the Falls.

Thank you for the opportunity to comment on the result of the Study and express our interest in the future of this site. Protecting our water supply is important: we don't want another Flint, Michigan.

If you have any questions regarding our comments, please contact Patricia Deinhart-Bauknight at [patricia@wcno.org](mailto:patricia@wcno.org).

Sincerely,  
Sheree Breedlove.



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

101 East Fifth Street  
Suite 2000  
Saint Paul, MN 55101

651-222-2193  
[www.fmr.org](http://www.fmr.org)  
[info@fmr.org](mailto:info@fmr.org)

Col. Karl Jansen, District Engineer  
St. Paul District, US Army Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101

March 18, 2021

Dear Colonel Jansen:

We appreciate the opportunity to comment on the Upper St. Anthony Falls (USAF) Lock and Dam Disposition Study draft report.

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 its 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.

In this context, we hoped to see the draft disposition report sufficiently address the significance of the USAF Lock, and the Corps' ongoing ownership and management of it, to the Minneapolis riverfront. Instead, the draft report dismisses the Corps' essential role at St. Anthony Falls and proposes a full disposal that is in direct opposition to stakeholder preference and Congressional direction. The proposal would place the Minneapolis-St. Paul region at enormous risk of harm to its water supply, recreation, and river navigation.

We strongly oppose the Corps' proposal for full deauthorization and disposal of the USAF Lock. This alternative does not meet the report's planning objectives, insufficiently evaluates the risks and constraints, and disregards Congressional direction. We urge the Corps to revise its report to account for these shortcomings, and we urge the Corps to select a modified Alternative 2 (partial deauthorization and disposal) as the Tentatively Selected Plan (TSP).

Our comments are outlined below as follows:

- Comments on specific elements of the draft report
- Report conflicts with Congressional direction in WRDA
- The federal interest in retaining ownership of the USAF lock
- Recommendation: modified Alternative 2

## **2.4 Planning Objectives**

The Corps states that two planning objectives "are the basis for formulation of alternative plans." One of those objectives is to "Support future visions for continued use of USAF Lock and Dam by stakeholders and the public." (p. 22) Based on the stakeholder comments made at the March 3 public meeting and other stakeholder statements of which we are aware, the majority (if not all) of stakeholders object to deauthorization and disposal other than what was directed by the 2020 Water Resources Development Act (WRDA).

Given this, the Corps' report does not meet one of its two planning objectives. This should lead to a substantive revision of its conclusions and recommendations to accurately reflect stakeholder interests.

## **3.4 Existing Safety Evaluation**

We are concerned that the Corps does not consider the impacts of a cutoff wall failure in this section. Regardless of who owns and is responsible for the cutoff wall, the Corps built it and should consider the consequences of its condition and potential failure as an essential part of this study. The Corps should also address the cutoff wall under Section 6.5 (Risk and Uncertainty) for all alternatives.

## **4.5 Evaluation of Alternatives**

We disagree with how the Corps evaluated alternatives against the four evaluation criteria (completeness, effectiveness, efficiency, and acceptability). The ratings should be reassessed as discussed below. We believe that this will lead to a Low rating for Alternative 1a.

Completeness: “The plan must provide and account for all necessary investments needed to ensure the realization of a successful disposition. Environmental risks, needed real estate acquisition preparations, operations and maintenance costs, and potential transferees should be considered. Completeness is also assessed based on the willingness of an entity to take over the facilities, and the ease of conveyance for the government to take the necessary steps to transfer the facilities.” (p. 43)

For Alternative 1a, this measure’s rating should drop from High to Low. WRDA 2020 makes it significantly less likely that a willing entity will step forward to take over the lock facilities that are not conveyed to the City of Minneapolis or its designee. WRDA 2020 grants the City or its designee the reserved rights of entry, use of, and construction on any property they don’t take, reducing the appeal for another party to take over these remaining facilities.

These reserved rights would also likely require an increased level of funding from Congress to attract a new owner, making the “ease of conveyance” more difficult. Leaders of Minnesota’s Congressional delegation have stated their objections to Alternative 1a; we do not anticipate that they would authorize conveyance nor provide the needed funding to a new owner. These realities should be accounted for.

Effectiveness: “The extent to which the measure achieves the planning objectives and avoids planning constraints.” (p. 43)

Based on the stakeholder comments made at the March 3 public meeting and other stakeholder statements of which we are aware, the majority (if not all) of stakeholders object to deauthorization and disposal other than what was directed by WRDA 2020. Therefore, Alternative 1a does not meet the Effectiveness Measure as it does not satisfy one of the planning objectives.

The ratings and comments in Table 4-6 should be revised to reflect this lack of effectiveness in meeting the planning objectives. Comments that disposal (beyond what is directed in WRDA 2020) is compatible with future visions for the site should be removed. Alternative 1a needs to be reduced from High to Low for this Measure.

Efficiency: “The extent to which the measure is cost effective. Efficient plans would require the least cost to ensure the realization of a successful disposal.” (p. 43).

As stated under the Completeness Measure, WRDA 2020 made it far less likely a willing entity will come forward to take ownership of a property over which they have so little control. Even if an entity were to step forward, the incentive payment would likely need to be very large. Under Alternative 1a, the rating for this Measure needs to be reduced from Moderate to Low as the current rating does not account for this large incentive payment.

Acceptability: “Evaluation of whether the measure is acceptable to stakeholders, including the state and federal resource agencies, local governments, non-profit organizations, and the public, and the extent to which each measure could be implemented concordantly with any of the known future visions for the area.” (p. 43)

As stated above, stakeholders clearly, and almost unanimously, oppose deauthorization and disposal. The rating for Alternative 1a should be changes from High to Low. Also, the report should not state that “This alternative better accounts for future use at the site.” This alternative is in clear conflict with planned uses at the site.

Given the above analysis, the Corps needs to reconsider its ratings for all the action alternatives. In particular, Alternative 1a should have an overall Low rating and, therefore, is not an acceptable alternative. The statements under the TSP with regard to the Measures are incorrect.

## **5. Environmental Consequences of the Alternatives**

This section of the report incorrectly conflates “unknown effects” with “no effects.” The report states: “While it can be argued that each action alternative is a step towards realizing a different future vision for USAF, identifying the environmental effects of this would be largely speculative.” (p. 66) This statement is a recognition that there will be effects. Yet the Corps then asserts there will be “no effects” from any of the proposed action alternatives. How can the Corps, while stating that there will be effects but not knowing what those effects could be, come to a determination of “no effect”?

The report states that nothing about the current “conditions described for each resource would not change under any of the alternatives,” and “the proposed action would not result in any physical changes to the environment.” (p. 66, 96) This is incorrect.

If Congress deauthorizes the navigation and recreation missions and transfers Corps property to a non-federal entity, this will lead to changes to the “physical, ...biological, cultural, and sociological characteristics of the project study area.” (p. 66) The Corps is incorrect in stating that there will no effects.

The new conditions could be substantially different; a new owner may use the lock in new ways. Without federal ownership, many of the federal laws, regulations, and Executive Orders that currently impact the Lock will no longer apply, substantially weakening future environmental reviews. By selecting Alternative 1a, the Corps hopes to achieve a specific outcome, and no further review of alternative outcomes will be possible. That means that the Corps should not avoid a full environmental review now.

The Corps has done a thorough job of defining the current conditions or the No Action conditions, but it has not examined the clearly foreseeable conditions from deauthorization and disposal. We know that with deauthorization and disposal:

- Much of the federal review authority will go away, which will lead to actions that will not need to meet rigorous federal laws, regulations, and policies for review and approval.
- The new owner(s) will not use the Lock and related property for navigation and will not need to use it for flood mitigation.
- Recreation use will be deauthorized, and, as is stated several times in the report, recreational use will increase.
- New recreational amenities will be added to the site.
- New uses of the existing buildings will increase recreation or other activities.

We support the Corps' completion of a Section 106 review under the National Historic Preservation Act and negotiation of a Programmatic Memorandum of Agreement (PA) to address potential future uses. In this, the Corps is acknowledging that it must address "speculative" outcomes, as that is what a PA does. At a minimum, the same level of anticipation or speculation could be applied to the National Environmental Policy Act (NEPA) review.

On p. 66, the Corps speaks directly to "implementing" one of the alternatives. This is no different than implementing the preferred alternative for a levee alignment. Each alternative and its potential effects must be thoroughly vetted against the others. But for this EA, the Corps claims that because it does not know the effects that could come from implementing the action alternatives, it does need to consider the effects and may do so later. This, again, violates the idea of adequately weighing the impacts of different alternatives before the preferred alternative is selected and is inherently predecisional.

## **6. Tentatively Selected Plan**

### **Implementability**

"Complete deauthorization and disposal with an incentive is considered the most implementable alternative, provided that an entity fitting the qualifications and public uses intended by Congress, provides a statement during or shortly after the public review period." (p. 88)

We disagree. Given our earlier comments, Alternative 1a is not the “most implementable alternative” for the following reasons:

- The Corps has not adequately assessed the impacts of each alternative under NEPA, so it can’t conclude which action alternative is the most implementable.
- WRDA 2020 changed crucial elements of future site use and control, which the Corps did not factor into its assessment.
- Key members of the Minnesota Congressional delegation are adamantly opposed to deauthorization and disposal (beyond what will be transferred to the City or its designee per WRDA 2020) and have clearly stated Congress’ intent to the Corps.

Without addressing these issues, the Corps cannot state that Alternative 1a is the most implementable. In fact, given known Congressional opposition it may be impossible.

### Recreation

Under its review of Recreation on p. 87, the Corps states: “Under all alternatives, recreational use is anticipated to increase in association with the City of Minneapolis’ plan to create a ‘...comprehensive recreational, touristic, and interpretive experience” at the site.’ However, there is no basis to conclude the effects would be different across alternatives.”

This is not accurate. Deauthorization and disposal could adversely affect those recreation plans if the property goes to an entity not willing to work with the City and its partners or properly maintain the property it owns. Since the Corps does not know the identity of a prospective entity that has not yet come forward to take the remaining property it cannot know whether that entity would intend to use the property in a manner that is consistent and compatible with future recreational uses.

### Mitigation for Adverse Environmental Effects

Corps determines that “No adverse environmental effects are anticipated for the TSP. Therefore, no mitigation is identified.” (p. 89) However, the Corps hasn’t assessed the potential effects and cannot, therefore, know what mitigation is needed or not.

Again, the Corps cannot put off such an analysis because they claim it is speculative. Many of the impacts of deauthorization are not speculative, nor are the most likely consequences of disposal under Alternative 1a or the other action alternatives. Proposing a specific alternative fixes it in place and impacts must be assessed and addressed before that happens. Waiting until after the TSP is approved and deauthorization happens will severely limit mitigation options.

## **7. Compliance with Environmental Statutes**

Under many of the acts mentioned in Section 7, the Corps asserts there will be no impacts but offers no analysis to support this assertion. There are two problems with this approach. First,

as we have demonstrated elsewhere, the Corps has not evaluated the potential impacts of the action alternatives, claiming to do so would be speculative. Second, even if no impacts would occur, the Corps still needs to explain how they came to this conclusion.

#### **Appendix H. Draft Finding of No Significant Impact (FONSI)**

In the Draft FONSI, the Corps asserts that: “Pursuant to section 106 of the National Historic Preservation Act of 1966, as amended, the U.S. Army Corps of Engineers determined that the recommended plan would have no potential to cause effects on historic properties.” (p. 5)

This statement is unfounded and is another example of the Corps conflating “unknown effects” with “no effects.” The Corps has not initiated the Section 106 process, nor are we aware of any other evaluation of potential effects on historic properties. How can the Corps be sure of “no potential to cause effects” without an evaluation?

We are also not aware of formal consultation with MNRRA, Native American groups, or other important stakeholders. “Preliminary, informal discussions” (as cited on p. 94) do not count as compliance with Section 106.

The Draft FONSI must be corrected to reflect that impacts to historic properties have not yet been assessed. Until this assessment is complete, it is premature to declare “no significant impacts” and premature to determine a TSP.

#### **Report Conflicts with Congressional Direction**

##### **WRDA 2018**

Section 1225 of WRDA 2018 requires that the Corps include “plans for carrying out modifications to the Upper St. Anthony Falls Lock and Dam to (A) preserve and enhance recreational opportunities and the health of the ecosystem; and (B) maintain the benefits to the natural ecosystem and human environment.” (p. 4-5)

The Corps, however, has declared its intentions not to comply with this directive because, “it was not the objective of the study for the Corps to develop measures to enhance or improve recreation opportunities, the human environment and the natural environment, however, the TSP is conducive to the new owner and outside stakeholders developing the site to accomplish these objectives.” (p. v)

Despite being told they “shall” do so, the Corps has ignored this directive. Instead, it continually states that some other entity and unnamed stakeholders can pursue such plans after the Corps transfers the property to the new entity or entities. The Corps is speculating here by presuming they will find a new owner and assuming that new owner will have recreation, the human environment, or the natural environment as priorities. So, the Corps insists it cannot examine the environmental impacts of potential new uses saying to do so

would be speculative, but then it attempts to avoid a Congressional directive by speculating what might happen after deauthorization and disposal.

In choosing not to comply with WRDA 2018, the Corps missed an opportunity to provide the public and Congress with a preferred alternative that most stakeholders want.

#### WRDA 2020

As discussed above, the draft report does not adequately account for the Congressional directives in WRDA 2020, particularly how the City's ownership of some Lock property will affect outcomes for the remaining property.

Section 356 of WRDA 2020 also clearly states, "Ownership rights to the Upper St. Anthony Falls Lock and Dam shall not be conveyed under this subsection, and the Secretary shall retain all rights to operate and maintain the Upper St. Anthony Falls Lock and Dam."

On March 1, six leaders of Minnesota's Congressional delegation reiterated their intent in a letter to Acting Secretary Whitley: "We are frustrated that the St. Paul District has taken this [full disposal] position not only because full disposition is inconsistent with the expedited conveyance in Section 356, but also because it has been advised of Congressional intent in this matter previously.

"A January 8, 2019, letter to the Corps from Senators Klobuchar and Smith stated the expectation that, 'the Corps would cooperate with the City of Minneapolis to develop a plan in which the Corps would continue to own, operate and maintain the Upper Lock for flood control and water supply management and divest to the City a portion of the real property surrounding the Upper Lock.' Our commitment to this goal is unchanged."

The Corps believes that Congress will authorize deauthorization and disposal, and will appropriate an incentive payment for a yet-unidentified new owner. Congress has been clear that it has no intention to do so. As stated above, this has clear implications for the report's assessment of alternatives and should be addressed in the final report.

#### **The Federal Interest: Recreation, Water Supply and Navigation**

We want to address the distinction between a federal interest in the future of the USAF Lock and Dam, and the federal interest in its current navigation mission. At the March 3 public meeting, the Corps said that for there to be a federal interest, there has to be a currently authorized federal mission. This is not the case. The federal interest, as demonstrated by the Corps' detailed economic analysis for the National Economic Development (NED) plan, is based on whether there are national economic benefits from the project, as yet authorized or not. We believe there are such benefits, both from what is currently authorized and from what should be.

Further, Section 216 of the Flood Control Act of 1970 allows the Corps to review existing projects “*when found advisable due [to] significantly changed physical or economic conditions, and to report thereon to Congress with recommendations on the advisability of modifying the structures or their operation, and for improving the quality of the environment in the overall public interest.*” (p. 2)

The changed physical and economic conditions for the USAF Lock & Dam have led to the current study, but the law does not limit the analysis to the currently authorized primary purpose. The Corps can consider whether, due to the changed conditions, there are other reasons for reporting to Congress “*with recommendations on the advisability of modifying the structures or their operation, and for improving the quality of the environment in the overall public interest.*” We strongly support modifying the structures and operations to support new, nationally significant uses. We also believe that there is still a navigation interest for the Corps to stay at St. Anthony Falls.

By staying at the USAF Lock in partnership with the key stakeholders and by modifying the structures and their operations at the site, the Corps can help improve “the quality of the environment in the overall public interest.” The public interest is readily apparent in the disposition report, based on the economic investments in the downtown riverfront - public and private - and in the series of planning studies that call for substantial investment in riverfront parks and amenities, as evidenced by the opening of Water Works Phase I later this year.

We believe the Corps should advise Congress that there still is a federal interest in staying at the lock given the nationally significant needs and opportunities being proposed by Friends of the Falls and due to the water supply needs of the largest metropolitan area in the region and largest on the Mississippi River. These needs and opportunities - including benefits to NED - greatly exceed the site’s value gained from navigation.

#### Recreation and Cost-Sharing

At the March 3 public meeting, the Corps stated that everyone wanted them to continue owning the Lock, but no one was willing to share in the costs. This is not true. Friends of the Falls has secured a \$2.8 from the State of Minnesota and is willing to match that with \$2.5 million of private funding, totaling \$5.3 million. In addition, the National Park Service (NPS) is already sharing some costs and has taken over visitor management responsibilities and through NPS funding sources could bring more federal funding to the site. Mississippi Park Connection has also helped fund key improvements and interpretation at the site and will be an important funding partner going forward.

With a robust and nationally significant visitor facility at the Lock, millions more in funding will become available. While not covering all the Corps’ maintenance costs, these

partnerships will certainly reduce those costs. For these reasons, the Corps needs to substantially reconsider its economic calculations for staying at the Lock.

### Water Supply

Federal appropriations and Corps work saved St. Anthony Falls. The Corps built the cutoff wall under the river and the two roll dams and plugged the cavities in the sandstone caused by the Eastman Tunnel collapse. Because of the cutoff wall, Minneapolis and St. Paul Water Works can supply over one million Twin Cities residents with water, as well as the businesses, institutions and health services that rely on them. The Minneapolis-St. Paul International Airport also depends on this water supply to serve the 40 million passengers who travel through the airport each year. A loss of water to the airport would reverberate nationally and internationally; a massive number of flights would have to be diverted to other airports. A serious examination of all the national and international connections that would be disrupted by a failure of the cutoff wall or the surface damming structures at St. Anthony Falls must be a part of the Corps NED analysis.

The Corps did not mention the St. Paul water supply in their consideration of dam removal and overall consequences of a dam failure at St. Anthony Falls. As the report states, the river would cut down the channel for 30 miles upstream. The St. Paul water intake is only about nine miles upstream and would therefore be in jeopardy. The Corps needs to examine this concern before finalizing their study.

### Downstream Navigation Functions

A dam failure, the study says, “would have profound impacts on water turbidity and sediment load that would continue for many decades. The sediment influx would end up in dredge shoals in Pool 2 and would likely result in increased dredging.” (p. 18) Since the USAF Lock, two Corps dam sections and the cutoff wall preserve the dam and reservoir at St. Anthony Falls, it is in the interest of downstream navigation to make sure these structures do not fail. If they did, the Corps and the federal government would have to spend millions more in dredging for decades. The only way for the Corps to ensure that the USAF Lock is properly maintained to support downstream navigation is to retain ownership.

### **Recommendation: Modified Alternative 2**

In light of all of these comments, we believe that the Corps must stay at St. Anthony Falls and embrace a modified Alternative 2. Under the modified alternative, the Corps would keep all the remaining property the City or its designee does not take. The Corps would not seek deauthorization of its navigation mission but would recommend adding water supply as second primary mission and bolstering its recreation mission.

A modified Alternative 2 would meet both planning objectives, and when put through the assessment of planning measures, it would lead to defensible ratings. The NED analysis,

when it takes into account the water supply mission and the remaining navigation function, would demonstrate a substantial positive benefit cost ratio and critical federal interests.

The Corps has been interpreting its first study objective, “reduce the federal investment for ownership and operations, maintenance, repair, rehabilitation, and replacement of USAF Lock and Dam over the next 50 years” to mean that it must eliminate all costs. Alternative 2 would not do that. It would, however, lead to substantial federal cost reduction by having multiple partners who will bring substantial funding to the site. The Corps would also have access to new funding sources, especially if Congress authorizes water supply as another primary mission and the Corps increases its recreational presence.

Add to this the value of the water supply mission. Preserving the dams at St. Anthony Falls would rank as one of St. Paul District’s most important projects. What other Corps project serves the needs of well over one million people, an international airport through which over 40 million people pass each year, and the multiple businesses and institutions of the major regional hub with national and international connections? The Corps worries about \$7 million in maintenance costs over the next 50 years. The long-term and multiple cost benefits of Corps built and owned structures at St. Anthony Falls dwarf this amount, and the return on investment is significantly greater than some other Corps projects.

In conclusion, **we urge the Corps to revise the draft disposition study to address these comments and to recommend a modified Alternative 2 as the Tentatively Selected Plan.**

We also urge the Corps to continue maintenance of the Lock throughout this period. At the March 3 public meeting, we learned that some elements are already deteriorating. Given the Lock’s prominent location downtown Minneapolis and at one of the most visited sites on the whole Mississippi River, how can the Corps allow the Lock to deteriorate? In addition, allowing a site eligible for the National Register to deteriorate is considered neglect and is an adverse under Section 106 of the National Historic Preservation Act.

Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "Whitney L. Clark". The signature is fluid and cursive, with the first name being the most prominent.

Whitney L. Clark  
Executive Director



**Robert Olson**  
Manager, Operations  
1414 West Hamilton Avenue  
P.O. Box 8  
Eau Claire, WI 54702-0008  
Phone: 715-737-2692

U.S. Army Corps of Engineers  
ATTN: Nanette Bischoff (PM-B)  
Minneapolis Locks Disposition  
180 5th St. E., Suite 700  
St. Paul, MN 55101

RE: Public Comment on the Disposition Study of the upper St. Anthony Falls Lock and Dam

Dear Ms. Bischoff:

The lock and dam are critical pieces of infrastructure which affect millions of people and multiple states. The Army Corp of Engineers created the complex Mississippi River lock system, and Xcel Energy would respectfully opine that the Army Corp of Engineers is likely the only party which has the knowledge and resources to ensure the system operates for the benefit of those many stakeholders. Xcel Energy does not rely on the operation of the lock and dam for the operation of its hydroelectric generation plant and would not be interested in acquiring these facilities.

Thank you for the opportunity to review and comment on the Disposition Study.

Respectfully submitted,

Robert Olson

CC:  
James M. Zyduck, Director Renewable Operations



March 15, 2021

**District Engineer, St. Paul District, Corps of Engineers**

ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101  
mplslocksdisposition@usace.army.mil

**RE: USACE UPPER ST. ANTHONY FALLS LOCK AND DAM DISPOSITION STUDY DRAFT REPORT**

Dear Jonathan Sobiech and Nan Bischoff:

Cedar-Riverside Community Council (CRCC) is submitting the following comment in response to the *USACE Upper St. Anthony Falls Lock and Dam Disposition Study draft* - issued January 20, 2021.

The CRCC exists to serve the Cedar-Riverside Neighborhood and our mission is to serve the residents, businesses, workers, and youth who live and experience our neighborhood every single day. The CRCC is proud to be recognized by the City of Minneapolis as the official neighborhood organization giving VOICE to these neighborhood constituencies.

CRCC constituents are the residents, businesses, workers, students, nonprofits, and large institutions in Cedar-Riverside, the most diverse neighborhood in Minneapolis. As a formal neighborhood organization, we work in close partnership with our constituents to improve access to resources, promote neighborhood priorities, and identify solutions.

**Public Use of Surrounding Property**

One of our community goals is to remove the real and perceived boundaries between Cedar-Riverside, the riverfront, and the central business district. To that end, we support efforts to increase public access and better connect Bohemian Flats, Mill Ruins Park, the Stone Arch Bridge, Water Works, the Upper Lock, and other key sites along the central riverfront.

The Upper St. Anthony Falls Lock and Dam has sat vacant for far too long. Our Board of Directors, staff, and constituents recognize the recreation, tourism and interpretive opportunities of this site, and we support efforts to increase public use.

We also acknowledge and respect the site's significance as homeland to the Dakota and other Indigenous communities.

**Maintenance, Flood Control & Water Supply**

Our community is equally concerned with the ongoing maintenance and operation of the Upper Lock. We are concerned about increased likelihood of flood damage due to climate change, and we – like the entire City of Minneapolis - rely on the reservoir above the lock for drinking water. Both Congress and the Army Corps must acknowledge that flood mitigation and water supply ARE in the federal interest.

**Our Position**

We believe it is possible to have improved public access and a well-maintained, trustworthy Lock.

**We are opposed to the Army Corps' recommendation to fully dispose of the Upper Lock and provide a monetary incentive to the new owner.**

CRCC strongly urges the U.S. Army Corps of Engineers to pursue partial disposition - and abandon its desire to fully dispose of the property.

The Army Corps should continue to own and maintain the Lock itself. The Army Corps should also expedite WRDA 2020 implementation guidance and convey excess, surrounding property to the City of Minneapolis or its designee for public use.

**Respectfully – and on behalf of the *CRCC Board of Directors and our Neighborhood,***



**ZEV RADZIWILL**

*President, Board of Directors  
Cedar Riverside Community Council  
president@cedarriversidenrp.org  
(612) 338-5578*

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**FARTUN DEL, VICE PRESIDENT**

**SISCO OMAR, SECRETARY**

**AHMED MUSSA, TREASURER**

**MOHAMED ADAN**

**HAWO GUREY**

**HALIMO HASSAN**

**HODAN ALI**

**LEE JORDAN**

**MARY MELLEN**

**MOHAMED SALAD**

**ALI SALEH**

**RUSSOM SOLOMON**

**KADER H. ALI**

Col. Karl Jansen, District Engineer  
St. Paul District, US Army Corps of Engineers  
ATTN: Regional Planning and Environmental Division North  
180 Fifth Street East  
St. Paul, MN 55101

March 18, 2021

Dear Colonel Jansen,

I would like the US Army Corps of Engineers to continue owning and maintaining portions of the Upper St. Anthony Falls lock. The Corps' presence is crucial for maintaining drinking water supply, managing flood risk, and monitoring the integrity of the lock and dam. One million Twin Cities residents, along with the Minneapolis-St. Paul International Airport and other essential entities depend on the Upper lock for its water supply. If the Corps were to absolve itself of any responsibility for the lock, the threat to our community's basic infrastructure would be catastrophic.

I also support transferring the land surrounding the lock, as well as parts of the structure that are not essential to continue lock operations, to the City of Minneapolis or another entity for public use. There is widespread community support for increased public use and river access at this site; transferring ownership of unused Army Corps property can fulfill these local goals while reducing the Corps' ongoing maintenance responsibilities. The disposition of this "excess" land should be completed as quickly as possible.

For these reasons, I urge the Army Corps to abandon its proposal for full disposition. Instead, the Corps should expedite the transfer of some land for public access while retaining permanent ownership of the remaining property.

Signed,

1. Jim Adams



2. Betsy Adamson



3. Maria Ahlgren



4. Rita Aigner



5. Irene Alderson



6. Karen Alexander



7. Nicolas Allinder



8. Cindy Anderson



9. Michael Anderson



10. Cary Anderson



11. Janet Anderson



12. Michael Anderson



13. Anita Anderson



14. Cindy Angerhofer



15. Martha Archer



16. Grant Armour



17. Catherine Asher



18. Neely Atha



19. Nicholas Badham



20. Eldree Baer



21. Michael Bahr



22. Christina Banks



23. Lisa Barry



24. Bob Bartlett



25. Barbara Batchelor



26. Ann Beane



27. Carol Bechtel



28. Craig Beddow



29. Tom Beer



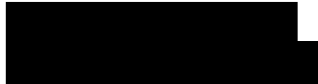
30. Elizabeth Belfiore



31. Lisa Bergerud



32. Fred Bertschinger



33. Michele Bevis



34. Witney Bjerke



35. Lois Bjorlie



36. Nancy Bjornson



37. Jason Bobsein



38. Julia Bohnen



39. Melissa Boman



40. Diane Borgmann



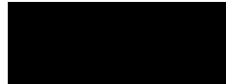
41. Jamila Boudlali



42. Rex Boutelle



43. Joseph Boyle



44. Kathryn Bradley



45. Rebecca Branch



46. Steve Brandt



47. Erika Brask



48. Gretchen Bratvold



49. Lois Braun



50. Aviva Breen



51. Laura Bretheim



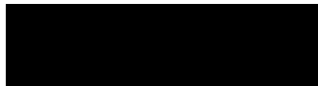
52. Sara Brice



53. Owen Brown



54. Lauren Brown



55. Sue Brown



56. Carole Bruinsma



57. Laurie Bruno



58. Jean Buckley



59. Brock Bucklin



60. Marc Burgett



61. Donna Butler



62. Jane Byron



63. Richard Carlson



64. Christopher Carlson



65. Carolyn Carr



66. Alex Carroll



67. Chad Caruthers



68. Cynthia Case



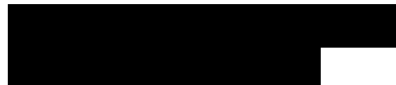
69. Melissa Cathcart



70. Bruce Center



71. Andrea Chatfield



72. Chris Chookiatsirichai



73. April Christensen



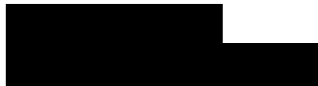
74. Gary Christenson



75. John Christianson



76. Bruce Cibuzar



77. Whitney Clark



78. Tom Clarke



79. Katherine Clayton



80. Marc Clements



81. Kate Clover



82. Pat Combs



83. Linda Comstock



84. Lea Coon



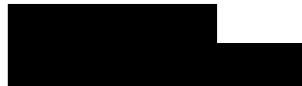
85. Mehroo Cooper



86. Chuck Coskran



87. Jim Cox



88. Dave Crawford



89. Barbara Crosby



90. John Crosby, Sr.



91. Jared Cruz



92. Audrey Cullen



93. Amy Cusick



94. Mariann Cyr



95. Sandra Daly



96. Mark Davidson



97. Grace Davies



98. Kay Dawson



99. Alice De la Cova



100. Janna de Lue



101. Janette Dean



102. Larry Decker



103. Mary Ann Deeg



104. Bryan Deiman



105. Keira Deiman



106. Leah Deiman



107. Sara DeKok



108. Daina Deprez



109. Melia Derrick



110. Mike DeRusha



111. Ashok Dhariwal



112. Robert Dietz



113. Amy Dietz



114. Steve Dietz



115. Carol Dines



116. Katherine Doerr



117. Larry Dole



118. Britta Dornfeld



119. Sophie Downey



120. Shirin Downey



121. Brendan Downey



122. Tom Drude



123. Tru Dunham



124. Rosa Dunn



125. Tom Dunnwald



126. Sophie Durbin



127. Matt Edman



128. Eli Effinger-Weintraub



129. Greg Eklund



130. Lucy Elliott



131. Jack Enblom



132. Janice Engberg



133. Susan Engel



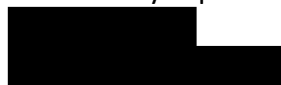
134. Stacy Enzmann



135. Scott Erickson



136. Shirley Espeland



137. Sean Esslinger



138. Mike Etlicher



139. Carol Evans-Smith



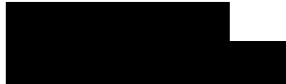
140. Heidi Farnham



141. Megan Fatheree



142. Kimberly Feilmeyer



143. Gretchen Fernelius



144. David Fettig



145. John Finazzo



146. Mary Firestone



147. Richard Fish



148. Shawne FitzGerald



149. Elizabeth Fleck



150. Rayna Fox



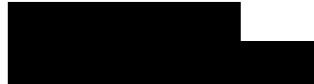
151. Doreen Frankel



152. Brad Frederiksen



153. Dan Freese



154. Mary Frei



155. Bruce Freidson



156. Chris Frethem



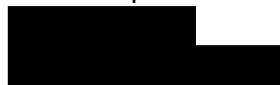
157. Gail Frethem



158. Robert Fried



159. Philip Friedlund



160. Johnathan Gamez



161. Nancy Gardner



162. Cecilie Gardner



163. Kathryn Gaylord



164. Cindee Geach



165. Jane Gerber



166. Barbara Gibson



167. Mark Gilbert



168. James Gleckner



169. Barbara Goldner



170. Melissa Gonzalez



171. David Goon



172. Steve Gray



173. Vincent Graziano



174. Fred Green



175. Daniel Green



176. Greg Greene



177. Jean Greenwood



178. Robinlyn Gregory-Kennedy



179. Evan Griggs



180. J. Grogan



181. Thomas Gross



182. Ella Grote



183. Gayl Gustafson



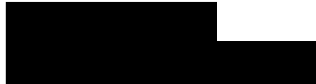
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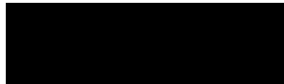
185. Wendy Haan



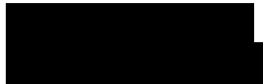
186. Linnea Hadaway



187. Janet Hagen



188. Gina Hahn



189. Michael Hahn



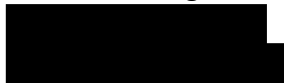
190. Nils Halker



191. Molly Hall



192. Sue Halligan



193. Dean Hamilton



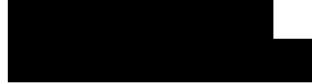
194. Suzanne Hansen



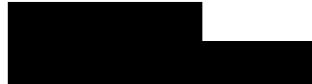
195. Kay Hanson



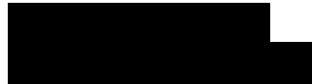
196. Paige Hanson



197. Reid Hanson



198. Philip Harder



199. Ian Harding



200. Cindy Harloff



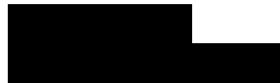
201. Nancy Harms



202. Cynthia Harrison



203. Cathleen Hauenstein



204. Kate Haugen



205. M.L. Haywood



206. Jenny Heck



207. Fitzie Heimdahl



208. John Helland



209. Mark Hendrickson



210. Brandon Henke-Fiedler



211. Michelle Hensley



212. John Herman



213. William Herzog



214. Sharon Hilberer



215. Dhaivyd Hilgendorf



216. Peg Hinz



217. Elizabeth Hinz



218. Meg Hirman



219. Judith Hoffman



220. Jared Hoffman



221. Gail Hofmann



222. Diane Hofstede



223. Kris Hogquist



224. David Hohle



225. Samuel Hojnacki



226. Jeanine Holden



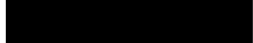
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228. Joshua Houdek



229. Lindsey Howell



230. Jennifer Hsia



231. Michael Huber



232. Patricia Huberty



233. Joan Hughes



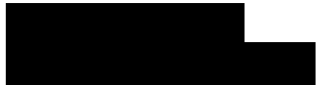
234. Maxine Hughes



235. Jake Hurwitz



236. Robert Hyrkas



237. Josh Iniguez



238. Erinn Jagiela



239. Carolyn Jahns



240. Jennefer James



241. Elsie Jamin-Maguire



242. Stephanie Japs



243. Richard Jensen



244. Alyssa Jensen



245. Darynne Jessler



246. Kathy Johannes



247. Ardes Johnson



248. Christopher Johnson



249. Birgit Johnson



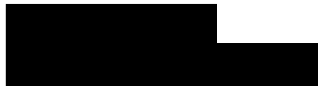
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251. Wade Johnson



252. Kirsten Johnson



253. Sandra Johnson



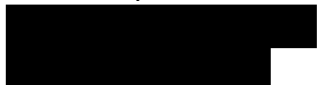
254. Nathaniel Johnston



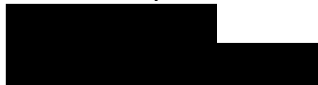
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256. Kathy Jones



257. Wendy Jonson



258. Catherine Jordan



259. Ellen Joseph



260. Peter Joyce



261. Andrew Judson



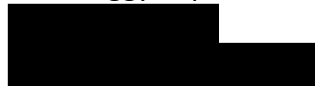
262. Mitchell Kall



263. Jeannie Kant



264. Peggy Kaproth



265. Amal Karim



266. Pamela Kaufman



267. John Kaul



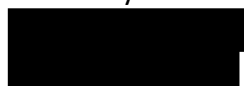
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269. Forrest Kelley



270. Gary Kelzenberg



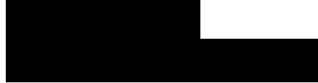
271. Brad Kern



272. Heather Kieweg



273. Thomas Kilbury



274. Hannah Jo King



275. Elaine Klaassen



276. Stuart Knappmiller



277. Barbara Knox



278. Colleen Knuth



279. Nathan Knutson



280. Lauren Koch



281. John Koepke



282. Lauren Kofsky



283. Waverly Konynenbelt



284. Linda Krach



285. Michael Kramer



286. Ron Kroese



287. Susie Kuller



288. Sarah Kunkem



289. Jeanne LaBore



290. Blakely LaCroix



291. Greg Lais



292. Lynette Lamb



293. Karl Lambert



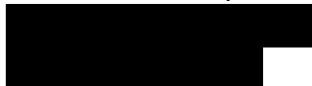
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295. Josie Larimer



296. James LaRoy



297. Lynn Larson



298. Karen Larson



299. Gregg Larson



300. Charles Laubersheimer



301. Matthew Laue



302. Thomas Law



303. Mary H Leary



304. Peter Leete



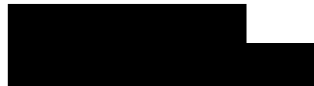
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306. David Lind



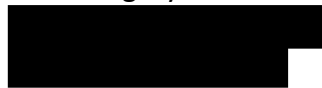
307. Ruth Lindh



308. Lanny Linehan



309. Gregory Littler



310. Jim Lovestar



311. Anne Lowe



312. David Lucas



313. Mark Lucker



314. Gary Lundquist



315. Ethan Lynch



316. Mary Kay Lynch



317. PJ MacGillis



318. Kathryn Mack



319. Carol Mack



320. Mary Maguire



321. Darrell Majkrzak



322. Catherine Malave



323. Maria Malik



324. Joelyn Malone



325. Barry Maloney



326. Tahera Mamdani



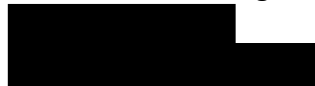
327. Nina Manzi



328. B Katherine Maple



329. Laurence Margolis



330. Ann Marie



331. Leslie Martin



332. Brian C Martinson



333. Jeffrey Masco



334. Carol Masters



335. June Mathiowetz



336. Carol McCarty



337. Kathrine McCaustland



338. William McDonald



339. Mike McGhie



340. Cynthia McKeen



341. John McKenzie



342. Pat McPeak



343. Sonja Meintsma



344. Sahil Merchant



345. Ben Merchant



346. Elizabeth Merryman



347. Jan Mershon



348. Thomas Mevissen



349. Gary Meyer



350. Kristen Meyer



351. Linda Michie



352. Scott Miller



353. Steven Miller



354. Sarah Miller



355. Dan Miller



356. Robert Milligan



357. Brian Moe



358. Cindy Moews



359. Anne Molleeus



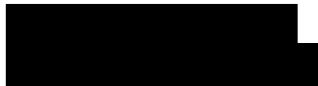
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361. Karen Moon



362. Deborah Moore



363. Sherri Moore



364. Natalie Morrigan



365. Paul Moss



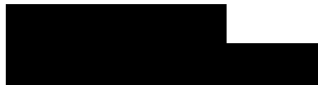
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367. Joseph Muldoon



368. Linda Muldoon



369. Thomas Mundahl



370. Sarah Murray



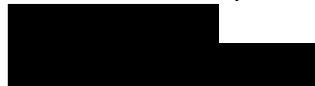
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372. Susan Myers



373. Meredith Myers-Petro



374. Jennifer Naglak



375. John Nash



376. Hanna Nedrud



377. Janet Neihart



378. Matt Neil



379. Theresa Nelson



380. Joanne Netland



381. Yvonne Nordstrand



382. Tracy Nordstrom



383. Joanne Norris



384. Hugh Norsted



385. Patrick Nunnally



386. Colleen O'Connor Toberman



387. Margie O'Loughlin



388. P. D. Oliveira



389. Leigh Olmstead



390. Erik Olsen



391. Mark Olson



392. John Olson



393. William Olson



394. Leone Olson



395. Gabe Ormsby



396. Allison Osberg



397. Paudeen Ostenson



398. Kath Ousks



399. Paul Owen



400. Todd Paddock



401. Eve Parker



402. Cory Parkos



403. Carolyn Patterson



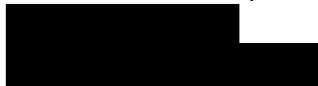
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405. Paul Pentel



406. Constance Pepin



407. Katherine Peraza



408. Enoch Peterson



409. Carin Peterson



410. Nancy Peterson



411. Haylie Petre



412. Daniel Petrik



413. Zach Petroski



414. Chris Pexa



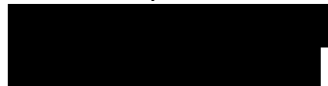
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416. Christine Popowski



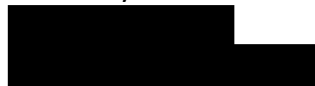
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418. Malcom Potek



419. Wayne Potratz



420. Jim Pounds



421. Ashley Prado



422. Cora Preston



423. Tyler Prieve



424. Carmine Profant



425. Ann Quiring



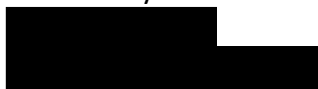
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427. Sarah Ramler-Olson



428. Marcy Rede



429. Wendy Reid



430. Shirley Reider



431. Hector Reillo



432. Kate Reinhardt



433. Doretta Reisenweber



434. Tom Reiter



435. Keith Relyea



436. Karen Renaud



437. Pamela Renkel



438. Sarah Renner



439. Laurie Rice



440. Graham Richardson



441. Claire Richardson



442. Janice Richardson



443. Margot Rideaux-Crenshaw



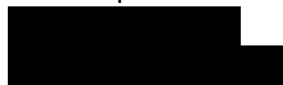
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445. Clare Ritter



446. Stephanie Robison



447. Shelley Robshaw



448. Michael Robshaw



449. Ellen Rogers



450. Ed Rogers



451. Jeanne Ronayne



452. James Rosenberg



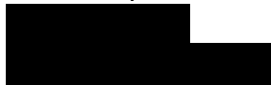
453. Elaine Rosner



454. Lisa Ross



455. Terry Rossi



456. Alexander Roth



457. Amy Rottunda



458. Juliann Rule



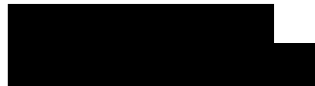
459. Greg Rupert



460. Erin Russ



461. Susan Russell Freeman



462. Janet Ryan



463. Jim Ryan



464. Jenni Ryan



465. Matthew Ryg



466. Diva Salomao



467. Bonita Sample



468. Florence Sandok



469. Lois Schadewald



470. Matthew Schaut



471. Diana Schleisman



472. Ann Schley



473. David Schmidt



474. Michael Schmidt



475. Konrad Schmidt



476. Karen Schneewind



477. Richard Schroeder



478. Martin Schub



479. Jennifer Schuetz Hadley



480. Paul Schwarzkopf



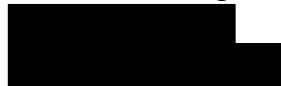
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482. Kurt Seaberg



483. Corinne Segal



484. Ricky Sellman



485. Rebecca Shedd



486. Donna Sherlock



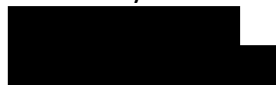
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488. Shelley Shreffler



489. Tracy Sides



490. Angie Simonson



491. Rhonda Simonson



492. La Sims



493. Marjory Singher



494. Connie Skildum



495. Emma Smurr



496. Taylor Snyder



497. Brad Snyder



498. Francesca Socki



499. Kendra Sommerfeld



500. Jackson Spencer



501. David Stack



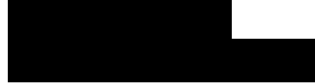
502. Amie Stager



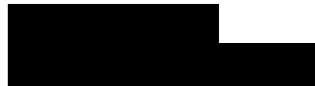
503. Deb Stancevic



504. Kristin Stapleton



505. D Stave



506. Claire Steinberg



507. September Steinolfson



508. John Steinworth



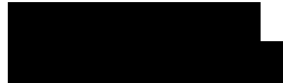
509. Norris Stenstadvold



510. Kenneth Stewart



511. Frank Stifter



512. Carol Stoddart



513. Erik Storlie



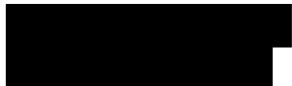
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515. Scott Strack



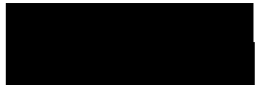
516. Anne Straka-Leland



517. Diena Street



518. Marsha Studer



519. Kathleen Stuebner



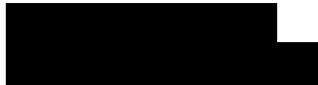
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521. Gabriela Sweet



522. Jonathan Taga-Neumann



523. Christopher Tastad



524. Emily Tate



525. Theresa Taylor



526. Stefon Taylor



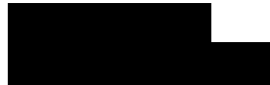
527. Virginia Templeton



528. Denise Tennen



529. Diane Tessari



530. Barbara Thoman



531. Mackenzie Thompson



532. Jim Tiede



533. Bruce Tiemann



534. Terri Tilotta



535. David Tinjum



536. Sam Toberman



537. Earle Tonra



538. Marilyn Torkelson



539. Donneen Torrey



540. Duane Tougas



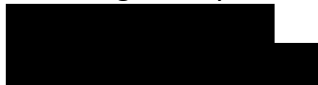
541. Jay Traver



542. John Trout



543. Megan Troyer



544. Sandra Trudeau



545. Jennette Turner



546. CJ Valenti



547. John Van Heel



548. Erika Van Krevelen



549. David Van Sant



550. David Vander Haar



551. Lynn Vander Haar



552. Akia Vang



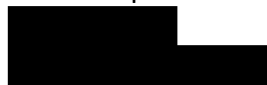
553. Douglas Verdier



554. Steven Verdoorn



555. Philip Vieth



556. Susan Vikse



557. Matt Von Zeller



558. Jo Vos



559. Wallace Wadd



560. Cathy Wagner



561. Tracie Ward



562. Richard Waryan



563. David Washburn



564. Larry Waterman



565. Jeanie Watson



566. Becca Wayerski



567. David Wee



568. Lisa Weiberg



569. Laura Weingartner



570. Pamela Weisdorf



571. Barbara Weisman



572. David Weiss



573. Liz Welch



574. Roland Wells



575. Randy Wenthold



576. Joseph Wenzel



577. Debbie Werner



578. Sandra Wernimont



579. Frederick Weston



580. Mary Jo Wiatrak-Uhlenkott



581. Liz Wielinski



582. Pamela Wigen



583. Stephen Wiley



584. Jean Wilhelm



585. Denise Wilkens



586. Tom Wilkens



587. Cole Williams



588. Andrew Willman



589. ML Wilm



590. Melissa Winn



591. Katharine Winston



592. Marcy Woodruff



593. Jill Wooldridge



594. Scott Wooldridge



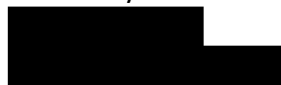
595. Erich Wunderlich



596. Russell Yttri



597. Polly Zabel



598. Arlene Zamora



599. David Zarkower



600. Richard Zarmbinski



601. Laurie Zenner



602. Jenni Zickert



603. Dave Zumeta

