



**US Army Corps
of Engineers®**

St. Paul District

Appendix J: Summary of Comments from 2021 Draft Report Review

UPPER ST. ANTHONY FALLS LOCK AND DAM

SECTION 216 DISPOSITION STUDY

REVISED DRAFT INTEGRATED DISPOSITION STUDY AND
ENVIRONMENTAL ASSESSMENT

June 2025

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1 Summary of Disposition Study Comments

As part of the disposition study for Upper St. Anthony Falls (USAF) Lock and Dam and the surrounding land, the Draft Disposition Study Report was made available for public and agency review in January of 2021. The U.S. Army Corps of Engineers (USACE) received 119 written comments from approximately 730 total signers, predominantly via email. Comments were submitted by members of several groups: the general public, nongovernment organizations (NGOs) and local government organizations (LGOs).

USACE identified various major and minor themes presented in the letters, and the following summaries are organized as such. Table 1-1 summarizes the majority of themes addressed by each group. The total number of written comments includes two unique submissions: 73 individuals utilized a template form, and one letter was signed by 603 individuals. Both the template form and the singular letter reflected one major theme of keeping the lock and dam with minor subthemes of water source, flooding, and operations and maintenance, and another major theme of partial disposition with a subtheme of recreation. As these unique cases have identical themes, they are collectively referred to as template letters throughout this analysis.

Additional details regarding common themes and concerns from public comments are outlined in the following sections.

Table 1-1. Summary of Comment Submissions

Group	Individuals	Submissions	Unique Letters	Number	Major Themes	Minor Themes
Public	690	80	16	2718	Keep Locks & Dams, Partial Dispo	O&M, Flooding, Water Source, Rec.
NGOs	-	30	29	60	Partial Dispo, Keep Locks & Dams	O&M, Rec., Community
LGOs	1	1	1	6	Keep Locks & Dams, Partial Dispo	O&M, Invasive Carp, Flooding, Rec., Historical Properties

2 Major Themes

The following is an analysis of the major themes presented in the public comments. As seen in Figure 2-1, the most common major themes were keeping the lock and dam and partial disposition.

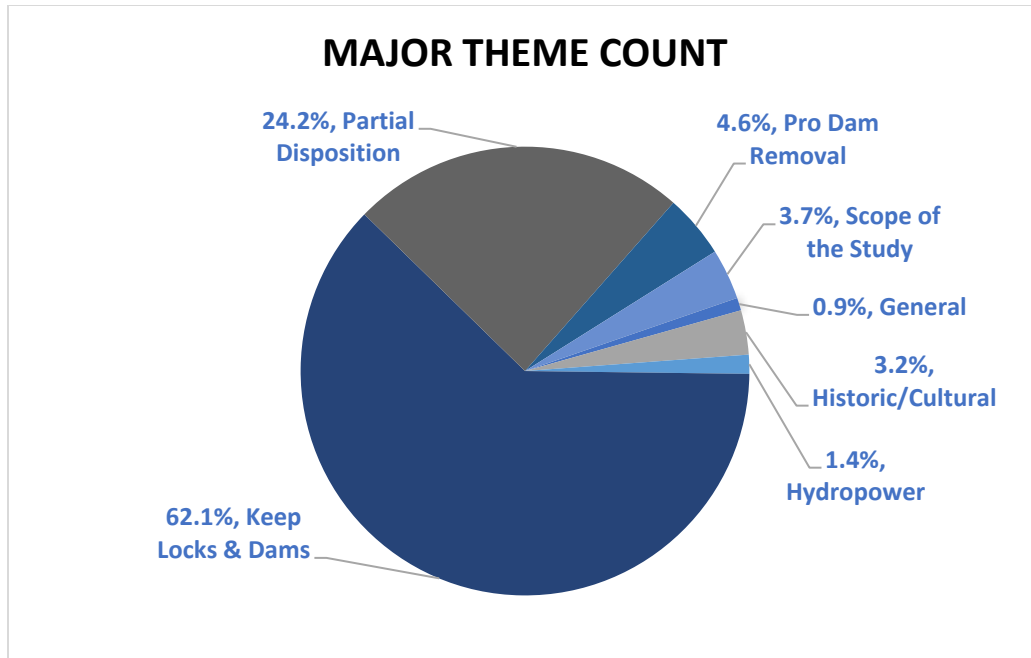


Figure 2-1. Major Theme Count Before Repeated Letters

Table 2-1 illustrates the total count and percentage of each major theme after the template letters had been included in the sum. Including the template letters has a large effect on the distribution of themes, as shown by comparing the percentages in Figure 2-1 with those in the table below.

Table 2-1. Major Theme Totals Including Repeated Letters

Major Theme	Count	Percentage
General	2	0.1%
Historic/Cultural	7	0.2%
Hydropower	3	0.1%
Keep Locks & Dams	2760	78.5%
Partial Disposition	727	20.7%
Pro Dam Removal	10	0.3%
Scope of the study	8	0.2%

Keep the Lock and Dam – Partial Disposition

These two major themes made up the overwhelming majority of all comments received and were often addressed in concert. Generally, commenters prefer that USACE maintain ownership of the lock and dam structures and transfer the surrounding land to the city of Minneapolis. These statements typically mentioned that USACE is the only agency with the knowledge and resources to maintain the structure they have operated for over 50 years.

Excerpts of Comments:

“[Through partial disposition] USACE’ real property and maintenance responsibilities are streamlined 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.”

Pro Dam Removal

Less than 5% of all the letters received were in favor of dam removal. These commenters were in favor of returning the river to its natural state because the lock and dam infrastructure is no longer in use. The remarks also mentioned ecosystem benefits and cost savings as a result of this alternative.

Excerpts of Comments:

“The dams in the Mississippi River Gorge were developed to support industrial and shipping activity that no longer exists.”

“River rapids are essential for wildlife to thrive; dams were created to support infrastructure that no longer exists... Additionally, continuing to operate and maintain this infrastructure costs federal taxpayers millions annually.”

Historic/Cultural

Several members of the public have brought forth concern that the cultural and historical significance of the site is being overlooked. This category of comments typically involved minor themes of indigenous communities as seen in the excerpts below.

Excerpts of Comments:

“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 Falls is an imminently sacred site to the Dakota people and other Indigenous communities...The protection of the watershed by creating the oasis would acknowledge their importance in the native way of life.”

Scope of the Study

Comments regarding the scope of the Upper St. Anthony Falls Disposition Study were made by interested nongovernmental organizations. These comments primarily represented an opposition to Full Deauthorization and Complete Disposal as the Tentatively Selected Plan on the grounds that it does not meet the completeness, effectiveness, efficiency or acceptability criteria required of tentatively selected plans.

Hydropower

Few comments were made with regard to hydropower at USAF. These comments suggested that while not currently used for hydropower, the dam could be modified to generate electricity which could serve as a renewed purpose for the structures present at USAF.

3 Minor Themes

The following is an analysis of minor themes presented in public comments. As seen in Figure 3, the most common minor themes were operations and maintenance, recreation, water source and flooding.

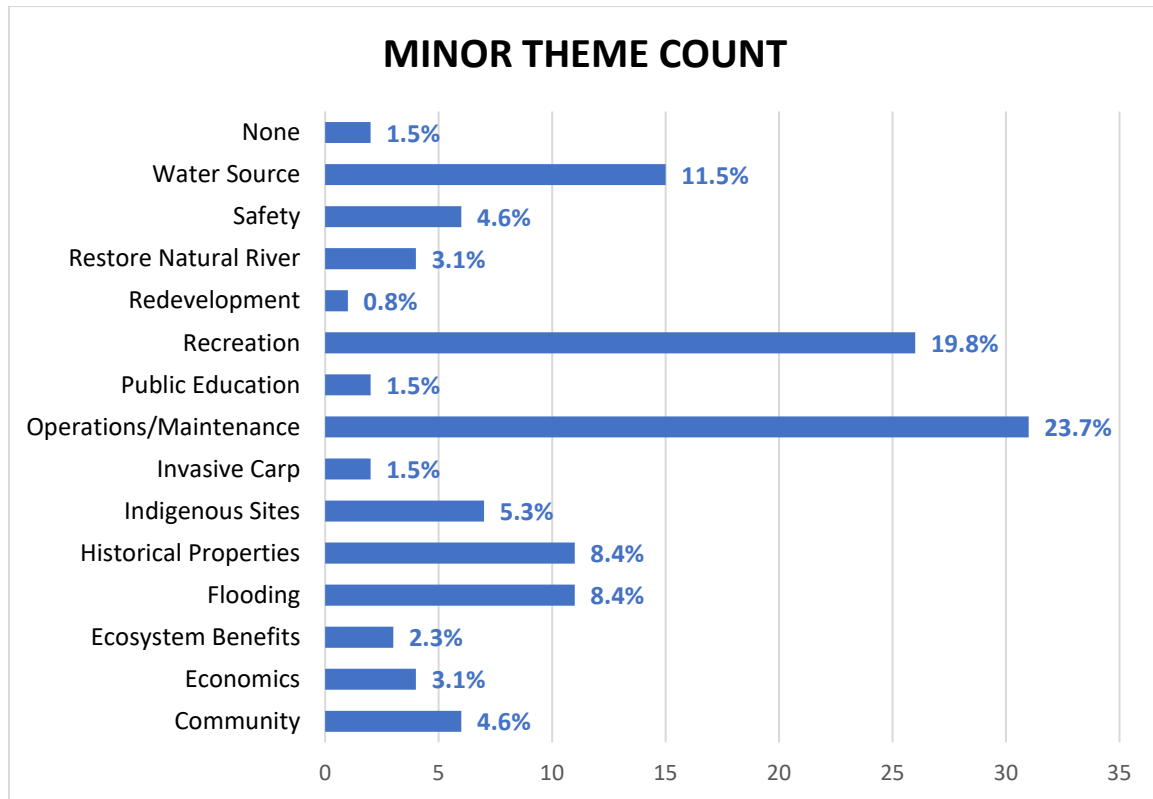


Figure 3-1. Minor Theme Count Not Including Template Letters

Table 3-1 portrays the total count and percentage of each minor theme after the template letters had been included in the sums.

Table 3-1. Minor Theme Totals Including Repeated Letters

Major Theme	Count	Percentage
Community	6	0.2%
Economics	4	0.1%
Ecosystem Benefits	3	0.1%
Flooding	685	24.2%
Historical Properties	11	0.4%
Indigenous Sites	7	0.2%
Invasive Carp	2	0.1%
Operations/ Maintenance	705	24.9%
Public Education	2	0.1%
Recreation	700	24.8%
Redevelopment	1	0.0%
Restore Natural River	4	0.1%
Safety	6	0.2%
Water Source	689	24.4%
None	2	0.1%

Operations/Maintenance

This category of comments states that USACE is the only organization with the knowledge and resources to operate and maintain the lock and dam and that disposition to another entity would not only be inefficient and costly but also may pose safety concerns.

Excerpts of Comments:

"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."

"We do not have confidence that a private, non-government entity would have the wherewithal to manage and pay for repair and recovery necessary to maintain lock and dam functions with regard to water source and flood mitigation."

Recreation

The minor theme of recreation was used primarily in support of the partial disposition major theme. Comments under this subtheme focused on using the land around the lock and dam structure for recreation and community purposes, including education on historical/cultural topics. Commenters state that the use of land in proximity of USAF Lock and Dam structures for recreational purposes would allow for increased public access to the river and falls to the benefit of local residents and visitors.

Excerpts of Comments:

"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."

"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"

Water Source

Comments designated with a minor theme of water source were most often tied to a major theme of keeping the lock and dam. The primary concern derived from these comments is the necessity of the presence and integrity of the lock and dam structure to maintain pool levels so that the Minneapolis-St. Paul area has adequate water supply.

Excerpts of Comments:

"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... Preserving the dams at St. Anthony Falls for water supply should rank as one of the St. Paul District's most important projects."

Flooding

Comments with a flooding subtheme were often tied to a major theme of keeping the lock and dam. These comments convey a desire for USACE to maintain and operate the USAF Lock and Dam structure to maintain consistent pool levels and mitigate potential flood risk. These comments represent concerns regarding seasonal and single-event flooding as a result of dam failure due to inadequate maintenance and operation if the site is fully disposed.

Excerpts of Comments:

"We urge the corps to consider its other missions that are still vital to the upper lock, including flood mitigation, water supply and recreation."