

# **Attachment A**

**Comment letters received during the 30-day public comment period for**

**The Pillsbury A-Mill Hydroelectric Project EAW**

**May 11, 2015 - June 10, 2015**



# Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

800-657-3864 | 651-282-5332 TTY | [www.pca.state.mn.us](http://www.pca.state.mn.us) | Equal Opportunity Employer

June 10, 2015

Ms. Kate Frantz  
Division of Ecological and Water Resources  
Minnesota Department of Natural Resources  
500 Lafayette Road  
St. Paul, MN 55155-4025

RE: Pillsbury A-Mill Artist Lofts Hydroelectric Project  
Environmental Assessment Worksheet

Dear Ms. Frantz:

Thank you for the opportunity to review and comment on the "Environmental Assessment Worksheet" prepared by the Minnesota Department of Natural Resources for the Pillsbury A-Mill Artist Lofts Hydroelectric Project (Project). The Project is located in St. Anthony Falls on the Mississippi River at river mile 854 in the city of Minneapolis. Minneapolis Leased Housing Associates IV, Limited Partnership (the Applicant) is proposing to restore hydroelectric renewable energy using the existing historic infrastructure at the former Pillsbury A-Mill building to generate renewable power to meet approximately 70% of on-site residential demands.

The Minnesota Pollution Control Agency (MPCA) has the following comment on this Project:

- A State Disposal System (SDS) permit may be required to store, treat, dispose and/or reuse dredged materials on-land for any project downstream of river mile 857.6 on the Mississippi River. Since the Project is located at river mile 854 (downstream of river mile 857.6), a SDS permit may be required. Information regarding the MPCA's dredged materials management is found on the MPCA's website at: <http://www.pca.state.mn.us/index.php/water/water-types-and-programs/wastewater/dredged-materials-management.html>

We appreciate the opportunity to review and provide comments regarding this Project. Please provide your specific responses to our comments and notice of decision on the need for an Environmental Impact Statement. This letter does not constitute approval by the MPCA of any or all elements of the Project for pending or future permit actions by the MPCA. Ultimately, it is the responsibility of the Applicant to secure any required permits and to comply with all requisite permit requirements. If you have any questions with MPCA's review of the Application, please contact me at 651-757-2465 or by email at [Patrice.jensen@state.mn.us](mailto:Patrice.jensen@state.mn.us).

Sincerely,

A handwritten signature in black ink that reads "Patrice Jensen". The signature is fluid and cursive, with the first name being the most prominent.

Patrice Jensen  
Planner Principal  
Environmental Review Program  
Resource Management and Assistance Division

PJ:ld

cc: Dan Card, MPCA  
John Betcher, MPCA

## Frantz, Kate (DNR)

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**From:** Lisa Hondros <lhondros@visi.com>  
**Sent:** Wednesday, June 10, 2015 1:48 PM  
**To:** \*Review, Environmental (DNR)  
**Subject:** Pillsbury A-Mill Artist Lofts Hydroelectric Project EAW  
**Attachments:** SAFA Comments P-14628.05.26.15.pdf

**ATTN: Kate Frantz, EAW project manager, Environmental Policy and Review Unit, Ecological and Water Resources Division**

Dear Ms. Frantz,

Thank you for the opportunity to comment on the Pillsbury A-Mill Artist Lofts Hydroelectric Project EAW.

The St Anthony Falls Alliance (SAFA) advocates for implementation of the Master Plan for the Central Mississippi Riverfront Regional Park. SAFA consists of representatives appointed by the neighborhood organizations along the Minneapolis central riverfront: North Loop Neighborhood Association, Downtown Minneapolis Neighborhood Association, Marcy-Holmes Neighborhood Association, Nicollet Island East Bank Neighborhood Association and the St. Anthony West Neighborhood Association. Our neighborhoods are home to well over 25,000 Minneapolitans living adjacent to the Mississippi River in or near the Project area.

SAFA has reviewed the Pillsbury A-Mill Artist Lofts Hydroelectric Project EAW and has determined that two important land use elements of the Central Mississippi Riverfront Regional Park Master Plan are within the proposed project boundaries but are not addressed in the Project EAW:

1. Restoration of the East Side Falls
2. Public access for tours of the A-Mill tunnel and a tunnel connector to the Regional Park.

Our concerns regarding Project impacts on plans for the Regional Park are elaborated in the attached copy of comments submitted by SAFA to FERC on May 26, 2015.

Further, SAFA is committed to protecting the beauty and power of the water flowing over St. Anthony Falls and appreciates the project Proposer's willingness to follow Xcel Energy's Aesthetic Flow Adequacy Plan (AFAP) once it is completed. However, SAFA has significant concerns regarding the adequacy of the design and methodology of Xcel's AFAP as proposed ten years ago.

SAFA agrees with the National Park Service, Minnesota Department of Natural Resources, City of Minneapolis, and the Minneapolis Park and Recreation Board that the aesthetic flow over St. Anthony Falls is of paramount importance. There is disagreement over what low flow means for St. Anthony Falls. This issue must be resolved before the impacts of all proposed hydroelectric projects on the flow over St. Anthony Falls can be properly evaluated.

Thank you again for the opportunity to submit comments on the Pillsbury A-Mill Artist Lofts Hydroelectric Project EAW.

Sincerely yours,

Lisa C. Hondros

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  
171 East Island Ave  
Minneapolis, MN 55401

Lisa C. Hondros  
St. Anthony Falls Alliance  
171 East Island Ave  
Minneapolis, MN 55401

May 26, 2015

Honorable Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE  
Washington, DC 20126

VIA Electronic Filing

**Re: Notice of Application and Applicant-Prepared EA Accepted for Filing, Soliciting Motions to Intervene and Protests, and Soliciting Comments, and Final Terms and Conditions, Recommendations, and Prescriptions; Minneapolis Leased Housing Associates IV, Limited Partnership, FERC No. 14628-001**

Dear Ms. Bose:

Thank you for the opportunity to comment on the above License Application by Minneapolis Leased Housing Associates IV (MLHA) for the Pillsbury A-Mill Artist Lofts Hydroelectric Project.

The St Anthony Falls Alliance (SAFA) advocates for implementation of the Master Plan for the Central Mississippi Riverfront Regional Park ("Regional Park"). SAFA consists of representatives appointed by the neighborhood organizations along the Minneapolis central riverfront: North Loop Neighborhood Association, Downtown Minneapolis Neighborhood Association, Marcy-Holmes Neighborhood Association, Nicollet Island East Bank Neighborhood Association and the St. Anthony West Neighborhood Association.

SAFA has reviewed the Regional Park Master Plan and has determined that two important elements of the Master Plan are within the proposed project boundaries of P-14628 and cannot be implemented without the co-operation of MLHA.

Therefore, SAFA asks that FERC attach conditions to any license issued to MLHA requiring MLHA to:

- 1) Cooperate with the Minneapolis Park and Recreation Board to ensure design of a pipe through the A-Mill tunnel that will allow restoration of flow over the East Falls (Bluff), as required by Article 408 of the March 8, 2004 License for Xcel's St Anthony Falls project P-2056.

- 2) Cooperate with the Minnesota Historical Society and the Minneapolis Park and Recreation Board to create public access for a visitor center and MNHS sponsored tours and eventual access to the Regional Park from the tunnels.

Additionally SAFA believes that the continued success and growth of this important recreation area relies on the beauty and power of St. Anthony Falls and is concerned that the minimum flows set under P-2056 and requested by MLHA in this application threaten the continued success of the Regional Park.

### **Recreational Resources at St. Anthony Falls**

It is FERC's policy with respect to recreation development at licensed projects to "seek, within its authority, the ultimate development of [recreational] resources, consistent with the needs of the area to the extent that such development is not inconsistent with the primary purpose of the project."<sup>1</sup>

The Regional Park is part of the Mississippi National River and Recreation Area (MNRRA) and is the fourth most visited regional park in Minnesota with over 2.0 million visits a year. In addition to these visitations, the Minnesota Historical Society has brought 400,000 school children from the region to the Park over the last ten years. This park is the fastest growing park in the regional system.

The Regional Park with the beauty and power of St. Anthony Falls at its center has been the driving element in the revitalization of the Minneapolis riverfront, bringing jobs and \$1.9 billion in private money to the area.

It is anticipated that the visitation numbers will continue their explosive growth as planned park projects such as the East Falls and A-Mill tunnel connections are completed, and as dense residential projects within a mile of the park continue to be built to take advantage of the area.

This Regional Park is unique in the regional system because it is within the boundary of a National Historic District. The park provides access to traditional passive recreational activities; but also provides unique interaction with historic elements such as the mill ruins and mill power systems. Water Power Park provides historic interpretation of hydroelectric power at St. Anthony Falls.

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<sup>1</sup> 18 C.F.R. §2.7 (2003). This statement of policy was promulgated by Order No. 313, 34 FPC 1546 (1965).

## **Restoration of the East Falls (Bluff)**

Restoration of the East Falls was determined to be in the public's interest by FERC in Article 408 of P-2056's license. As MLHA has stated, there is overlap of their proposed project boundary and P-2056.

The Mississippi Watershed Management Organization funded a feasibility study of restoring the East Falls conducted by Barr Engineering for the Minneapolis Park Board. The March 2011 study concluded that restoration of the East Falls was feasible at a modest cost. One suggestion for a water conveyance system proposed running a pipe through the Main Street tunnel to bring water over the East Falls. At that time, obstacles to this option included title problems with the Main Street tunnel and the installation cost of running a pipe through the tunnel.

MLHA's project proposal removes these obstacles. In its permit application, MLHA claims to have title to the Main Street tunnel and plans to build a pipe through that tunnel to carry water for its hydro facility. With MLHA bearing the expense of pipe installation, original concerns over cost are minimized. Channeling the small amount of additional water needed to restore flow over the East Falls through this pipe now appears very feasible.

The prospect of restoring water over the East Falls was greeted with great public enthusiasm and enormous coverage by the local press.

The following image was produced by Barr Engineering to show how a restored East Falls would look.



SAFA requests that any license issued by FERC be conditioned upon MLHA cooperation with the Minneapolis Park and Recreation Board to ensure design of a pipe through the A-Mill tunnel that will allow restoration of flow over the East Falls (Bluff), as required by Article 408 of the March 8, 2004 License for Xcel's St Anthony Falls project P-2056.

### **A-Mill Tunnel Access**

Another park project outlined in the Regional Park Master Plan which has sparked great excitement is creating public access for tours of the A-Mill tunnel and a tunnel connector to the Regional Park.

In 2014, Meyer Scherer Rockcastle, an architecture firm with extensive experience in and around the historic mills, completed a feasibility study of public access to the below ground A-Mill tunnels in cooperation with MLHA, concluding that the tunnels under that the structures below ground are as deep as the height of the structures above ground.

The study advocated for a staged approach to access, providing first for a visitor center and guided tours by the Minnesota Historical Society and then later for creating a connection through the tunnels to the Regional Park and the East Falls. Funding for later stage proposals to create the tunnel connection would be provided by public and private sources, not MLHA.

As emphasized by the City of Minneapolis in its Comments, access to the below ground area of the A-Mill is more important to the public than the single proposed interpretive sign. SAFA would prefer that the signage be deleted and that access to the tunnels be provided instead.

SAFA requests that any license issued by FERC be conditioned upon MLHA cooperation with the Minnesota Historical Society and the Minneapolis Park and Recreation Board to create public access for a visitor center and MNHS sponsored tours and eventual access to the Regional Park from the tunnels.

### **Impacts on Aesthetic Flow**

SAFA is committed to protecting the beauty and power of the water flowing over St. Anthony Falls and appreciates the project Proposer's willingness to follow Xcel Energy's Aesthetic Flow Adequacy Plan (AFAP) once it is completed. However, SAFA has significant concerns regarding the adequacy of the design and methodology of Xcel's AFAP as proposed ten years ago.

SAFA agrees with the National Park Service, Minnesota Department of Natural Resources, City of Minneapolis, and the Minneapolis Park and Recreation Board that the aesthetic flow



over St. Anthony Falls is of paramount importance. There is disagreement over what low flow means for St. Anthony Falls. This issue must be resolved before the impacts of all proposed hydroelectric projects on the flow over St. Anthony Falls can be properly evaluated.

Thank you again for the opportunity to submit comments on the MLHA License Application.

Sincerely yours,



Lisa C. Hondros  
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

## MEMORANDUM

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**TO:** Kate Frantz, EAW Project Manager  
Minnesota Department of Natural Resources

**FROM:** Haila Maze, Principal Planner, (612) 673-2098

**DATE:** June 9, 2015

**SUBJECT:** Pillsbury A-Mill Artist Lofts Hydroelectric Project EAW

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Below are comments from the City of Minneapolis on the Pillsbury A-Mill Artist Lofts Hydroelectric Project Environmental Assessment Worksheet (EAW). This is in response to the Minnesota Department of Natural Resources (DNR) notification dated May 11, 2015, inviting public comments on the EAW during the public review period.

Overall, the City supports the development of this hydroelectric project as part of the rehabilitation of the existing structures for the A-Mill Artist Lofts project. The City has already submitted comments on the Federal Energy Regulatory Commission (FERC) application and environmental assessment package to FERC, as part of their public comment periods on the draft and final packages.

We now have some additional comments on the DNR EAW, which are provided below. The page numbers are those in the EAW document.

- Page 7, paragraph at top of page – Mill and Main is located east or southeast of the project boundary, not west.
- Page 7, paragraph under ii – The existing Minneapolis comprehensive plan was adopted in 2009 (not 2000) and amended in 2011.
- Page 8, second full paragraph. This statement does not make sense and needs to be revised: “The Marcy Holmes Neighborhood Master Plan and found no inconsistencies with the Project. Additionally, the project Proposer consulted with the Marcy Holmes Neighborhood Association during planning for proposed Project.” It could also be noted that the neighborhood master plan was adopted by the City in 2014.
- Page 8, third full paragraph – The abbreviation for the critical area should be MNRRA, not MNNRA.
- Page 9, third paragraph of 10.a. – While the tailrace is within the Mississippi River Gorge, the intake portion is not, and this paragraph oversimplifies the geological description. It would be more correct to say that the project spans a geologically complex area right at St. Anthony Falls

where the topography and geology of the prairie river above the Falls changes to the gorge below St. Anthony Falls.

- Page 14, first paragraph of 14 – There should be an acknowledgment that the proposed project is located within a National Historic Landmark. Furthermore, while they are fairly minor, there will be some adverse impacts to features of the A Mill tunnel historic resource. There should be some reference to the project being subject to the Programmatic Agreement to assure that any adverse impacts are either avoided or adequately mitigated.
- Page 17, second paragraph of 14 - We agree with the document statement that the project will be in compliance with the Saint Anthony Falls Historic District guidelines, in particular Chapter 5 |Historic Infrastructure as it will retain the entire tunnel system as a whole in a sensitive manner. It should be noted that before building construction permits can be pulled, the project will need to be reviewed by the Minneapolis Heritage Preservation Commission for a Certificate of Appropriateness.
- Page 19, section 17 – This section addresses noise during the construction phase of the project. However, there is no mention of ongoing noise when the project is operating.
- Page 21, section about Crown Hydro – It might be worth noting that recently Crown Hydro has submitted an amended license application.
- General – The draft addresses many of the City of Minneapolis comments provided earlier in the FERC review process. However, it does not appear to address comments about proposed work on the catch basins. The Mead and Hunt Pillsbury A Mill Tunnel Historic and Engineering Condition Study stated the following about the catch basins: “One potential consideration is the existence of catch basins located on Main Street Southeast, which discharge into the tunnel. The discharge of storm water into the tunnel could lead to corrosion concerns with the hydrothermal and hydroelectric piping and support system. In addition, these locations could allow other undesirable materials into the tunnel including fuel spills, debris, and other chemicals.”

Diane Hofstede  
Great River Coalition  
610 Ramsey Street

Minneapolis, Minnesota 55413

[Dianehofstede@bitstream.net](mailto:Dianehofstede@bitstream.net)

612-331-6042

June 10, 2015

Minnesota Department of Natural Resources  
Division of Ecological and Water Resources, Box 25  
Attn: Kate Frantz  
500 Lafayette Road  
St Paul, MN 55155-4025

Dear Ms. Frantz,

Please find below the letter submitted by the Great River Coalition to Kimberly Bose, Secretary- FERC regarding FERC No. 14628---001.

June Honorable Kimberly D. Bose, Secretary Federal  
Energy Regulatory Commission 888 First Street NE  
Washington, DC 20126

VIA Electronic Filing

**1 RE: NOTICE OF APPLICATION AND APPLICANT---PREPARED EA ACCEPTED FOR FILING, SOLICITING MOTIONS TO INTERVENE AND PROTESTS, AND SOLICITING COMMENTS, AND FINAL TERMS AND CONDITIONS, RECOMMENDATIONS, AND PRESCRIPTIONS; MINNEAPOLIS LEASED HOUSING ASSOCIATES IV, LIMITED PARTNERSHIP, FERC No. 14628---001**

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Dear Ms. Bose:

Thank you for the opportunity to comment on the above License Application by Minneapolis Leased Housing Associates IV (MLHA) for the Pillsbury A---Mill Artist Lofts Hydroelectric Project.

The St Anthony Falls Alliance (SAFA) advocates for implementation of the Master Plan for the Central

Mississippi Riverfront Regional Park (“Regional Park”). SAFA consists of representatives appointed by the neighborhood organizations along the Minneapolis central riverfront: North Loop Neighborhood Association, Downtown Minneapolis Neighborhood Association, Marcy---Holmes Neighborhood Association, Nicollet Island East Bank Neighborhood Association and the St. Anthony West Neighborhood Association.

The Great River Coalition endorses the St. Anthony Falls Alliance (SAFA) comments below. Our members are members of the Alliance.

Our comments are regarding the following the following in addition to the comments of the St. Anthony Falls Alliance: This Important Bird Area includes the Mississippi River and its adjacent floodplain forest and uplands extending 27 river miles from the Washington Avenue Bridge adjoining the Mississippi River Twin Cities. It is an Important Bird Area in Minneapolis to the mouth of the Crow River in Hennepin County. For the most part, the other boundaries of this Important Bird Area are congruent with the boundary of the Mississippi National River and Recreation Area. It also includes the Elm Creek Regional Trail, Elm Creek Park Reserve and the Rice Creek corridor, in New Brighton (Ramsey County). This IBA lies within an area that has a very high population density and an area that is one of the fastest growing areas in the Twin Cities area. This IBA affords the public numerous sites to view birds from the many parks and other public access points along the River. There are 13 city parks along the river and all provide good views of birds; that is in addition to the 6 boat launches and 4 canoe access points; and 4 regional parks. Lying within the Mississippi Flyway this IBA is important for waterfowl, other water birds, raptors, and Neotropical migrants. The Mississippi River is one of the great bird flyways in the world. This is the migratory corridor for 40% of North America's waterfowl and shorebirds. A total of 234 species, compiled by various sources, has been documented in this IBA. There are four known heron rookery sites within this IBA. There are scores of double-crested cormorants that roost on islands in the Mississippi River between Coon Creek and the Coon Rapids Dam in the spring during migration. Species of Conservation Concern that use this IBA include Trumpeter Swan, Peregrine Falcon, Bald Eagle, American White Pelican, Horned Grebe, Red-shouldered Hawk and Forster's Tern

SAFA has reviewed the Regional Park Master Plan, as has the Great River Coalition and we have determined that two important elements of the Master Plan are within the proposed project boundaries of P---14628 and cannot be implemented without the co---operation of MLHA.

Therefore, SAFA and the Great River Coalition asks that FERC attach conditions to any license issued to MLHA requiring MLHA to:

- 1) Cooperate with the Minneapolis Park and Recreation Board to ensure design of a pipe through the A---Mill tunnel that will allow restoration of flow over the East Falls (Bluff), as required by Article 408 of the March 8, 2004 License for Xcel's St Anthony Falls project P---2056. Cooperate with the Minnesota Historical Society and the Minneapolis Park and Recreation Board to create public access for a visitor center and MNHS sponsored tours and eventual access to the Regional Park from the tunnels.

Additionally SAFA and the Great River Collation believes that the continued success and growth of this important recreation area relies on the beauty and power of St. Anthony Falls and is concerned that the minimum flows set under P---2056 and requested by MLHA in this application threaten the

continued success of the Regional Park.

## 2 RECREATIONAL RESOURCES AT ST. ANTHONY FALLS

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It is FERC's policy with respect to recreation development at licensed projects to "seek, within its authority, the ultimate development of [recreational] resources, consistent with the needs of the area to the extent that such development is not inconsistent with the primary purpose of the project."<sup>1</sup>

The Regional Park is part of the Mississippi National River and Recreation Area (MNRRA) and is the fourth most visited regional park in Minnesota with over 2.0 million visits a year. In addition to these visitations, the Minnesota Historical Society has brought 400,000 school children from the region to the Park over the last ten years. This park is the fastest growing park in the regional system.

The Regional Park with the beauty and power of St. Anthony Falls at its center has been the driving element in the revitalization of the Minneapolis riverfront, bringing jobs and \$1.9 billion in private money to the area.

It is anticipated that the visitation numbers will continue their explosive growth as planned park projects such as the East Falls and A---Mill tunnel connections are completed, and as dense residential projects within a mile of the park continue to be built to take advantage of the area.

This Regional Park is unique in the regional system because it is within the boundary of a National Historic District. The park provides access to traditional passive recreational activities; but also provides unique interaction with historic elements such as the mill ruins and mill power systems. Water Power Park provides historic interpretation of hydroelectric power at St. Anthony Falls.

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18 C.F.R. §2.7 (2003). This statement of policy was promulgated by Order No. 313, 34 FPC 1546 (1965).

## 3 RESTORATION OF THE EAST FALLS (BLUFF)

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Restoration of the East Falls was determined to be in the public's interest by FERC in Article 408 of P---2056's license. As MLHA has stated, there is overlap of their proposed project boundary and P---2056.

The Mississippi Watershed Management Organization funded a feasibility study of restoring the East Falls conducted by Barr Engineering for the Minneapolis Park Board. The March 2011 study concluded that restoration of the East Falls was feasible at a modest cost. One suggestion for a water conveyance system proposed running a pipe through the Main Street tunnel to bring water over the East Falls. At that time, obstacles to this option included title problems with the Main Street tunnel and the installation cost of running a pipe through the tunnel.

MLHA's project proposal removes these obstacles. In its permit application, MLHA claims to have title to the Main Street tunnel and plans to build a pipe through that tunnel to carry water for its hydro facility.

With MLHA bearing the expense of pipe installation, original concerns over cost are minimized. Channeling the small amount of additional water needed to restore the flow over the East Falls through this pipe now appears very feasible.

The prospect of restoring water over the East Falls was greeted with great public enthusiasm and enormous coverage by the local press.

The following image was produced by Barr Engineering to show how a restored East Falls would look.



SAFA requests that any license issued by FERC be conditioned upon MLHA cooperation with the Minneapolis Park and Recreation Board to ensure design of a pipe through the A---Mill tunnel that will allow restoration of flow over the East Falls (Bluff), as required by Article 408 of the March 8, 2004 License for Xcel's St Anthony Falls project P---2056.

## 4 A---MILL TUNNEL ACCESS

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Another park project outlined in the Regional Park Master Plan which has sparked great excitement is creating public access for tours of the A---Mill tunnel and a tunnel connector to the Regional Park.

In 2014, Meyer Scherer Rockcastle, an architecture firm with extensive experience in and around the historic mills, completed a feasibility study of public access to the below ground A---Mill tunnels in cooperation with MLHA, concluding that the tunnels under that the structures below ground are as deep as the height of the structures above ground.

The study advocated for a staged approach to access, providing for a visitor center and guided tours by the Minnesota Historical Society and then later for creating a connection through the tunnels to the Regional Park and the East Falls. Funding for later stage proposals to create the tunnel connection would be provided by public and private sources, not MLHA.

As emphasized by the City of Minneapolis in its Comments, access to the below ground area of the A---Mill is more important to the public than the single proposed interpretive sign. SAFA would prefer that the signage be deleted and that access to the tunnels be provided instead.

SAFA requests that any license issued by FERC be conditioned upon MLHA cooperation with the Minnesota Historical Society and the Minneapolis Park and Recreation Board to create public access for a visitor center and MNHS sponsored tours and eventual access to the Regional Park from the tunnels.

## 5 IMPACTS ON AESTHETIC FLOW

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SAFA is committed to protecting the beauty and power of the water flowing over St. Anthony Falls and appreciates the project Proposer's willingness to follow Xcel Energy's Aesthetic Flow Adequacy Plan (AFAP) once it is completed. However, SAFA has significant concerns regarding the adequacy of the design and methodology of Xcel's AFAP as proposed ten years ago.



SAFA agrees with the National Park Service, Minnesota Department of Natural Resources, City of Minneapolis, and the Minneapolis Park and Recreation Board that the aesthetic flow over St. Anthony Falls is of paramount importance. There is disagreement over what flow means for St. Anthony Falls. This issue must be resolved before the impacts of all proposed hydroelectric projects on the flow over St. Anthony Falls can be properly evaluated.

Thank you again for the opportunity to submit comments on the MLHA License Application.

Sincerely yours,

A handwritten signature in cursive script that reads "Diane Hofstede". The signature is written in black ink and is positioned above the printed name.

Diane Hofstede

Great River Coalition

June 10, 2015

Kate Frantz  
Planning Director, Environmental Review Unit  
Minnesota Department of Natural Resources  
500 Lafayette Road North, Box 32  
St. Paul, MN 55155

**RE: Environmental Assessment Worksheet (EAW)  
Pillsbury A-Mill Artist Lofts Hydroelectric Project**  
City of Minneapolis, Hennepin County, Minnesota  
Metropolitan Council Review No. 21411-1  
Metropolitan Council District 8

Dear Ms. Frantz:

The Metropolitan Council received the EAW for the Minneapolis Pillsbury A-Mill Artist Lofts Hydroelectric Project (Project) on May 11, 2015. The proposed Project would carry out alterations to the historic Pillsbury A-Mill hydropower infrastructure to allow installation of modern hydroelectric renewable power generating facilities to meet approximately 70% of the on-site residential demands of reconstruction of the building to accommodate 251 artist lofts.

The staff review finds that the EAW is complete and accurate with respect to regional concerns and does not raise major issues of consistency with Council policies. An EIS may be not necessary for regional purposes, but the following comments are offered for your consideration in that regard.

***Item 9.a.i. – Land Use of the Existing Site and Adjacent Areas (Jan Youngquist, 651-602-1029)***

The project area partially overlaps Central Mississippi Riverfront Regional Park, which is owned and operated by the Minneapolis Park and Recreation Board and is governed by the Metropolitan Council's 2040 Regional Parks Policy Plan. The EAW indicates that construction of the Project will require the removal of eight trees in the vicinity of the intake structure with a temporary surface area impact of 0.06 acres and the removal of twelve trees in the vicinity of the outlet structure with a temporary surface area impact of 0.15 acres, which includes an equipment staging area on the top of the bluff. Both of these areas are located within, or adjacent to, Central Mississippi Riverfront Regional Park. Appendix A of the EAW describes the re-vegetation plan. Council staff recommends that the Project be coordinated with the Minneapolis Park and Recreation Board to ensure minimal disruption to the regional park and its recreational use as well as acceptance of the re-vegetation plan.

***Item 11.b.i. – Water Resources- Wastewater (Roger Janzig, 651-602-1119)***

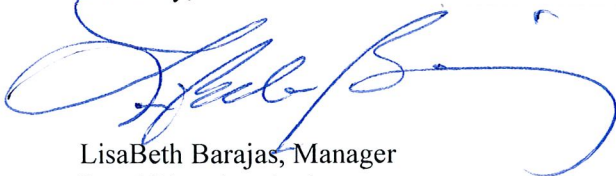
The proposed project has to potential to impact multiple Metropolitan Council Interceptors in multiple locations. To assess the potential impacts to our wastewater interceptor system, prior to initiating this project, preliminary plans should be sent to Scott Dentz, Interceptor Engineering Manager (651-602-4503) at the Metropolitan Council Environmental Services for review and comment.

*Item 13.c. – Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (rare features) (Jim Larsen, 651-602-1159)*

The EAW states that Chute's Cave and the Pillsbury A-Mill's associated man-made tunnels support the largest concentration of hibernating tricolored bats (*Perimyotis subflavus*), a state-listed species of special concern, in Minnesota. The document additionally states that as such, the Cave and tunnels constitute the most important hibernaculum for this species of bat in the state. The EAW indicates that the Cave is located under both Main Street SE, and the existing A-Mill building. Council staff is concerned that while this document *has* addressed the need to maintain access to and atmospheric conditions in the existing Cave and tunnels without modification so the bat population is not negatively impacted by the reconstruction, it *has not* addressed the possibility that the tricolored bat population might be negatively impacted by the future operation of the turbine-generator unit itself, in such close proximity to their hibernaculum. Specifically, we request that MDNR staff evaluate the potential for the bat population to be impacted not only by noise in excess of 75 decibels, but by the actual high-frequency operation of the turbine-generator unit. If the unit might generate sufficient 'noise' in a higher frequency range that might have the potential to disrupt the bat's continued use of the Cave and tunnels as their hibernacula, the unit should be sufficiently sound-proofed to avoid driving the bat population away from their hibernacula as a requirement of this proposed project's approval.

This concludes the Council's review of the EAW. The Council will not take formal action on the EAW. If you have any questions or need further information, please contact Jim Larsen PE, Principal Reviewer, at 651-602-1159.

Sincerely,



LisaBeth Barajas, Manager  
Local Planning Assistance

CC: Crystal Sheppeck, MHFA  
Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division  
Cara Letofsky, Metropolitan Council District 8  
Michael Larson, Sector Representative  
Raya Esmaili, Reviews Coordinator

# *Friends of the Riverfront*

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

*Tel: 612.579.2662 ednab@mac.com*

## **Kate Frantz**

Minnesota Department of Natural Resources  
Division of Ecological and Water Resources, Box 25  
Attn: Kate Frantz  
500 Lafayette Road  
St. Paul, MN 55155-4025

June 10, 2015

Re: Pillsbury A-Mill Artist Lofts Hydroelectric Project EAW

Dear Ms. Frantz:

Friends of the Riverfront, a Minnesota Non-profit, whose mission is to support the Central Mississippi Riverfront Regional Park appreciates the opportunity to comment on the A-Mill EAW.

We appreciate all that the Minnesota DNR has done to insure that hydro projects in the State comply with state water requirements and to preserve the natural environment.

All the work done by the DNR and others over the decades since the Clean Water Act has changed the Upper Mississippi from a dead river into a vastly improving habitat with a vibrant migratory corridor.

Friends of the Riverfront finds that the major problem with the EAW examination of the impact of the project on the natural environment is that it relies heavily on past studies. Reports used in the EAW that are 30 years old (reptiles and amphibians) and FERC studies from 1997 are hopelessly out of date. This is a vastly changed river from that of the past and it is continuing to improve.

We ask that the EAW be amended to include a discussion of the change flow on commonly seen fishing birds and the impact on nesting eagles. We also ask that the modeling study and the EAW include a discussion on the restoration of the East Side Falls which is a part of Xcel's license for their Main Street facility.

## **Return of Nesting Bald Eagles**

The EAW states on page 50 that "No eagle nests have been observed in or near the Project."

Somehow the EAW missed the press coverage of the nesting eagles at its doorstep.

The Star Tribune reported April 11, 2014: "An intriguing sign of the eagle's growing urbaneness is a new nest built in the heart of downtown Minneapolis, just upstream of the Interstate 35W bridge over the Mississippi..."

The continued rise in the birds' numbers "reflects the improving quality of the Mississippi River," as well as a growing tolerance by people and eagles for each other, said Mark Martell, bird conservation director for Minnesota Audubon."

## **Cultural Significance of the Eagles Return to the Dakota people**

Spirit Island, a rocky island inhabited by eagles just below the Falls, was a sacred place to the Dakota people and was thoughtlessly desecrated and destroyed by Europeans. This loss of a sacred site had been greatly mourned.

When working on the plans for the riverfront last year, the St Anthony Heritage Board consulted with a member of the Dakota nation about ways to honor what had been lost.

The Board, of which I am a member, were advised that the return of the nesting eagle to the Falls was seen as a sign that things had been restored or put back in balance. Nothing was wished. In fact anything that we might have attempted would only take away from what the eagles had done by their return.

As such the nesting eagle takes on even more importance, as does the preservation of trees that could grow to potentially support eagle nests.

## **Wildlife is an Important Recreational Feature of the River.**

The Minnesota DNR completed an excellent study to insure that the legacy fund would be well spent to insure that future generations would appreciate Minnesota's natural legacy.

One thing that the DNR concluded was that it was important to have what we term "starter nature" close to urban populations. The DNR concluded that such opportunities would interest Minnesotans in nature and hopefully lead some of them to explore a more wilderness experience in our state and national parks.

The Minneapolis riverfront provides just such a "starter nature" opportunity and the return of wildlife is one thing that make the river always interesting.

Dated studies and perhaps dated expectations from that the riverfront was too urban to support a vibrant natural environment caused much to be missed in the EAW.

For example, missing in this report include easily seen larger mammals like foxes, coyotes, deer and the elusive but entrancing river otters (also mentioned in the press).

More important, the report also missed large commonly seen fishing birds such as Great Blue Herons, Green Herons, Night Herons and Cormorants. These can often be seen from the Stone Arch Bridge in the back water where the outflow for the project is located.

While the National Audubon has termed this area of the river a nationally important bird area which attracts many with binoculars, these large and very active fishing birds congregate in this area and are easily seen by those for whom this is a "starter nature" experience.

The backwater where the project will be located is also a popular place for children to safely touch the water and to observe what is living in the shallows.

There is no discussion of how the increase in flow will impact these birds and this special area for children to touch the water.

**Aesthetics of the Flow are Important**

We are in agreement with the many statements by the Minnesota DNR, the National Park Service and others about the importance of the aesthetics of the Falls. This important nature experience depends on having sufficient water going over the Falls.

Once again thank you for the opportunity to comment on the EAW.

Sincerely,

A handwritten signature in blue ink, appearing to read "Anna Berg". The signature is fluid and cursive, with a long horizontal stroke extending to the right at the end.

**Frantz, Kate (DNR)**

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**From:** Robert Winston <winst009@umn.edu>  
**Sent:** Monday, June 15, 2015 4:18 PM  
**To:** \*Review, Environmental (DNR)  
**Subject:** Pillsbury A-Mill Artist Lofts Hydroelectric Project EAW

Dear DNR,

Thank you for soliciting comments re: the above project. I was formerly involved in testing the small craft navigation potential around the LSAF Turbine Array installed by Brookfield Renewable Energy Group and Nelson Energy.

I heard about a previous project wherein Crown Hydro was gauging reaction to installing a hydro project at the Upper St. Anthony Falls. As I recall, there was a negative community reaction to this project. However, there was a significant positive reaction when a Whitewater Park was proposed downriver, some years ago.

This would lead me to conclude that incorporating a Whitewater Park within this proposal would be a WIN-WIN for all involved. First, green power would be produced, secondly, within a park architecture that would be welcomed by the community as an urban recreational area.

I hope the above is part of your consideration. I submit this as an A.C.A. Whitewater Kayak Instructor who's enjoyed this state's river system for decades.

Thank you for your time.

Bob Winston  
(612) 432-0334

STATE HISTORIC PRESERVATION OFFICE

June 12, 2015

Kate Frantz  
Minnesota Department of Natural Resources  
500 Lafayette Road  
St. Paul MN 55155-4025

RE: Pillsbury A Mill Artist Lofts Hydroelectric Project  
Minneapolis, Hennepin County  
SHPO Number: 2014-2150

Dear Ms. Frantz:

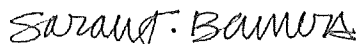
Thank you for the opportunity to comment on the above Environmental Assessment Worksheet (EAW) which was reviewed pursuant to the responsibilities given to the Minnesota Historical Society by the Minnesota Historic Sites Act (MS 138.665) and the Minnesota Field Archaeology Act (MS 138.40)

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, procedures of the Advisory Council on Historic Preservation for the protection of historic properties.

As indicated under Section 14 of the EAW, we have consulted with the federal agency regarding the area of potential effect (APE) for the proposed project. We have only initially consulted regarding identification of historic properties and potential adverse effects caused by the proposed project. Section 14 of the EAW incorrectly states that historic properties will not be adversely affected by the proposed project. As indicated in the project proponent's environmental documents, the proposed project will cause adverse effects to the Pillsbury A Mill, a historic property which is listed in the National Register of Historic Places and is a National Historic Landmark. We are currently consulting with the Federal Energy Regulatory Commission (FERC) and other consulting parties in preparation of a Programmatic Agreement to resolve adverse effects caused by this undertaking.

If you have any questions regarding our review of this project, please me at 651-259-3456 or [sarah.beimers@mnhs.org](mailto:sarah.beimers@mnhs.org).

Sincerely,



Sarah J. Beimers, Manager  
Government Programs and Compliance