

November 7, 2014

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

Re: Project No. 11175-024 / Crown Mill Hydroelectric Project

Dear Secretary Bose,

I am writing on behalf of the Downtown Minneapolis Neighborhood Association Board of Directors in support of terminating the existing Crown Hydro license.

More than 22 years have passed since Crown Hydro applied for a license to construct a hydropower generation facility on the Central Riverfront of Minneapolis on August 2, 1991. Two plus decades later, Crown Hydro has yet to provide FERC with most of the requested operational plans, studies, and stakeholder approvals required of a project of this type. Crown Hydro has delayed, or ignored, dozens of FERC requirements and deadlines for 22+ plus years. This fact alone supports termination of the existing Crown Hydro license.

Furthermore, we would like to call attention to three major issues which support terminating the Crown Hydro license:

1. This is a Completely New Project

The new proposed location and design of this project differs in every way from the current license held by Crown Hydro, issued in 1999, including:

- Location of the Headrace
- Location of the Powerhouse
- Location of the Discharge Tunnel
- Location of the Tailrace
- Location of the Transmission Line

The new proposal bears no resemblance to the currently licensed project. The public record supports defining the new proposal as a new project, including positions taken by both the FERC and the MPRB below:

- FERC Letter to Crown Hydro Dated April 15, 2013:

"The difference between the licensed project and Crown's current proposal are great enough to conclude that it is essentially a different project than the one analyzed in the 1990's..."

- FERC Letter to Crown Hydro Dated July 15, 2013:

"Rather than refurbishing existing buildings, canals, and tunnels as contemplated in your license, your proposal involves construction of a powerhouse on lands outside the current project boundary and construction of underground tunnels from the new powerhouse to a new point of discharge."

- MPRB Letter to FERC Dated August 14, 2013:

"Crown's latest attempt to style a completely new project as a license "amendment" is disingenuous at best. Crown has proposed a completely new project on a new site that requires a new headrace, tunnel and tailrace, and it should be considered as such."

The facts in the public record support FERC terminating the existing Crown Hydro license.

2. Crown Hydro Has Not Fulfilled FERC Requirements

There is no evidence that Crown Hydro has addressed stakeholder concerns, or complied with the Information Needs: Schedule A, both of which were set forth in the FERC letter to Crown Hydro dated April 15, 2013. In fact, most of the issues and concerns in the FERC letter were raised, and left unanswered, at the public meeting held by Crown Hydro on November 26, 2013. A video recording of that meeting can be found at:

http://youtu.be/m5VOrjv_xDU

The 60 day deadline set by FERC on April 15, 2013 has long since passed with seemingly no effort by Crown Hydro to comply with FERC mandates. This is just the latest of many deadlines Crown has missed or disregarded in the 22+ years since their original license application.

The long established pattern of inability or unwillingness to comply with FERC mandates and deadlines supports terminating the existing Crown Hydro license.

3. This Project Threatens the #1 Tourist Attraction in Minneapolis

The area surrounding the new project boundaries proposed by Crown Hydro – the Central Riverfront of Minneapolis – has undergone an amazing transformation in the 22+ years since the original license application. \$2.3B in in combined public/private investment has transformed the Central Riverfront from a desolate wasteland of abandoned buildings and empty surface parking lots into the #1 tourist attraction in Minneapolis, attracting over 1.8 million visitors each year, drawn largely by St. Anthony Falls and the Stone Arch Bridge.

St. Anthony Falls. Article 404 of the Crown Hydro license allows for St. Anthony Falls to be basically shut off during 6 or more months per year during low flows. Back in the 1990's when this project was conceived and licensed the economic impact of a dry falls would have been negligible,

given the fact that the Central Riverfront was not yet a major tourist attraction and public amenity. Today, a dry falls would be devastating to both the tourism industry and the use and enjoyment of the Central Riverfront by the general public.

The Stone Arch Bridge. The other main attraction on the Central Riverfront is the historic Stone Arch Bridge, under which Crown Hydro proposes to build a 930 foot long discharge tunnel, which was not part of their existing license. The geology of the riverbed in this section of the river is highly fragile. This area is also well known for having a history of catastrophic tunnel collapses due to the geologic instability of the area. Should the Stone Arch Bridge suffer a collapse or even major structural damage, it may not be possible to repair this National Historic Landmark, and no contingency has been made to fund such remediation even should it be possible.

Summary. Given the fact that the new Crown Hydro proposal constitutes a new project; and considering the inability or unwillingness of Crown Hydro to follow FERC requirements and deadlines; and taking into account the actual and potential negative impact on the #1 tourist attraction in Minneapolis, the public good would be best served by terminating the existing Crown Hydro license.

Sincerely,

Chad DiDonato, Board Chair

Downtown Minneapolis Neighborhood Association