AUGUST 14, 2018

To: District Engineer, St. Paul District, Corps of Engineers
From: Friends of Pool 2
Attn: Regional Planning and Environment Division North
180 Fifth Street East, St. Paul, MN 55101-1638
Re: Comments Regarding Scoping for USACE Minneapolis Locks
Disposition Study & Anticipated Environmental Assessment (EA)

Our organization respectfully submits the following document in response to the USACE's request for public comments regarding the scope of the Environmental Assessment (EA) for the above referenced Disposition Study.

Introduction:

Why we care. The mission of Friends of Pool 2, a nonprofit organization, includes advocating for all river users on the Mississippi River. We currently represent the interests of more than 600 recreational and commercial river users, river-related businesses, marinas, and riverfront property owners, many of whom enjoy this body of water on a daily or weekly basis. We live with the river, and care passionately about water quality and continued accessibility to this treasured natural resource. The members and supporters of Friends of Pool 2 have expressed several deep concerns regarding the scope of this disposition study, which we will attempt to summarize below.

Why everyone should care. Like many public issues, this one involves money. As Minnesota tax payers we all want our taxes spent in cost-effective ways. State funding is limited and needs to be prioritized. We believe that Minnesota residents would prefer to see their tax money spent as currently allocated, or on local infrastructure improvements, rather than spending hundreds of millions of dollars for maintaining and/or removing these dam facilities. Maintenance and operating costs for these locks and dams are currently born by the federal government, by way of the U. S. Army Corps of Engineers. If disposition is selected as an option, those costs will ultimately fall on private or public entities, which will inevitably require financial support from the State of Minnesota. That would mean removing funding from other local projects and re-allocating to pay for these facilities.

What about dam removal? One of the alternatives that may follow disposition by the USACE would be dam removal. Let's start out by saying that Friends of Pool 2, as an organization, supports the concept of dam removal in general. Many river ecosystems can benefit from dam removal, where appropriate, and there are many rivers in Minnesota where this is a perfectly logical approach. We question the appropriateness of dam removal in this case due to the unprecedented scale, historic usage, and unique character of the Mississippi River in this location.

Why is the ASACE involved here? As clearly stated on the USACE website, "Navigation was the Corps of Engineers' earliest Civil Works mission, dating to Federal laws in 1824 authorizing and funding the Corps to improve safety on the Ohio and Mississippi Rivers and several ports. The Corps provides safe, reliable, efficient, and environmentally sustainable waterborne transportation systems (channels, harbors, and waterways) for movement of **commerce, national security needs, and recreation."**

It may be of interest to note that the Fletcher Act, passed in 1932, broadened the scope of federal interest in navigation to include as "commerce" the use of waterways by seasonable passenger craft, yachts, houseboats, fishing boats and other recreational craft.[1]

[1] https://www.iwr.usace.army.mil/Portals/70/docs/iwrreports/MR-5.pdf

Also note the definition of commerce, per 62.3 Definition of Terms. Code of Federal Regulations, as follows: (b)Commerce. The term commerce, in addition to general, national and international trade and commerce of the United States, includes trade and travel by seasonal passenger craft (marine and air), yachts, houseboats, fishing boats, motor boats, and other craft, whether or not operated for hire or profit.

These three Lock and Dam facilities are currently included in a single study because of the USACE's assumption that they work together as a single commercial navigation system. For the purposes of the Corps of Engineers, this seems reasonable, but we'd like to point out that each facility is unique in its potential impact on both commercial and recreational navigation downstream from St. Anthony Falls. The downstream impact of disposition and/or removal of Lock and Dam #1 will vary greatly in both scope and character from the impact of disposition of the other two facilities in the study.

Scoping comments. Friends of Pool 2, on behalf of our members and supporters, offers the following list of questions and comments for the USACE's consideration in the Disposition Study and Environmental Assessment Study. Please refer to the explanatory paragraphs below the summary list for additional detail and supporting information.

Brief Summary of the (10) Scoping Comments included in this document:

1. The USACE is demonstrably the most qualified, cost effective, and reliable entity to own and manage these facilities. Therefore, we propose that the studies (and by extension, the U.S. Congress) should explore all possible alternatives to keep Federal control of the dams through the USACE.
2. What are the short and long-term detrimental effects of excess sediment from Pool 1 and Lower St. Anthony, which will be carried downstream into Pool 2, Pool 3, and Lake Pepin? The EA needs to include modeling of sediment transport.
3. Dredging of the channel in these pools should be reinstated for navigational and public safety purposes and to reduce the ongoing impact of river sediment on other pools.
4. 100+ years of potentially toxic sediment stored behind Lock and Dam #1 will present an environmental challenge that must be thoroughly addressed. Analysis of those sediment deposits and cost estimates for remediation must be included in the scope of this study to allow for educated decision making.
5. If these facilities are disposed, but not removed, what guarantees can be put in place to ensure that the dams are adequately maintained after disposition, and who will bear the cost burden? These costs should not fall on the State of Minnesota by default.
6. How would the possible disposition of these properties affect public safety in the region, and will the anticipated changes cause possible damages to existing infrastructure and private property?
7. Will this decision impact accessibility to the Mississippi River's resources for the diverse population of the region?
8. What would be the impact of disposition and/or dam removal on slowing or halting the migration of invasive Asian Carp Species, including Silver Carp and Bighead Carp?
9. Hydroelectric power is currently generated at these dams. If that non-fossil fuel generation is eliminated, how will it be replaced, and who will pay for that replacement?
10. If dam removal is ultimately chosen as the preferred option, what will the resulting "restored" river look like, and will it be suitable for the anticipated uses?

As these studies are prepared, keep in mind that the recommendations and actions that stem from the Disposition Study and EA will directly impact the water quality, ecology, hydrology, wildlife habitat, recreational usage, and commercial navigation of downstream sections of the Mississippi River.

Scoping Comments with additional detail and supporting information:

1. **The USACE is demonstrably the most qualified, cost effective, and reliable entity to own and manage these facilities.**

   When compared to local, corporate, or municipal group ownership, the Federal Government, via the USACE, is much more likely to view these facilities as a part of the larger river system. As such, we propose that the studies (and by extension, the U.S. Congress) explore all possible alternatives in the effort to maintain Federal control of the dams through the USACE.

   Every river is also a watershed system, and actions taken in one section of a river will impact the entire region. Repercussions from this decision will be felt throughout the region, not only in isolated pools. Individual private, state, or municipal entities historically do not consider the systemic effects of their decisions. However, the Federal Government should and can keep the "big picture" in mind as they make policy decisions. For these reasons the optimal outcome for river users would be to keep control and responsibility in the hands of the Federal Government (Corps of Engineers), as originally intended.

   Congress needs to investigate options other than the "no action" and the "shifting of facilities to private ownership". Perhaps those alternatives could include one or more of the following:

   - Transfer the facilities to the USACE's recreational mission, replacing the current navigational mission. The Corps of Engineers currently operates other recreational facilities in the region (Cross Lake, Brainerd). We believe that these Minneapolis facilities could lend themselves to a similar mission.
   - Operate Lock #1 on a limited, by appointment only, or emergency basis. This would allow limited availability to Pool 1, reducing the number of lock-throughs, which would increase the effectiveness of the lock and dam as a barrier to Asian Carp species. The lock could also then be used by MNDOT and other agencies to access the Pool for bridge maintenance and other reasons.
   - Retain USACE control of Lock and Dam #1 but dispose of Lower St. Anthony Falls (LSAF) lock and dam to hydroelectric company. This option could dramatically reduce labor and maintenance costs for the Corps over the long term, and possibly allow for an additional hydropower installation in the current lock chamber area of the LSAF dam.

   Retaining ownership of, and responsibility for, these facilities is the most effective overall way for the Corps to minimize any negative consequences within the adjacent pools and navigation channels in other pools downriver. Potential harm or benefit to the downriver pools must be considered in these studies.

   Regardless of who takes on the future operation and maintenance of these dams, the USACE constructed these structures, and shares responsibility for their past and current impact on the river. The Corps cannot be allowed to simply wash their hands of the facility and walk away. If the dams are de-authorized and ultimately removed, the Federal Government needs to accept responsibility for mitigation of some significant environmental threats, as well as potential infrastructure damages either caused or exacerbated by their structures.

   These responsibilities include dealing with the large sediment load in Pool #1 (see line items 2, 3, and 4, below). The original design provided for lower gates which were intended to release sediment at the base of the dam, but those gates have not been used as designed throughout the lifespan of the dam, resulting in the large sediment buildup we are witnessing today. Surveys from the 1990's estimated that buildup at 1.5 million

cubic yards. More recent data is not available, but we know that sediment loads have only increased in the decades since those surveys were done. It is possible that we are approaching the 2 million cu. yd. point today.

In addition, if Lock and Dam #1 is ultimately removed, there will be potential damage to private and public property in the adjacent pools, including bridge foundations, storm sewer systems, and retaining walls (see line item 6, below) which may overburden county, municipal, and private property owners. It could be argued that the Federal Government has a legal responsibility to address those damages.

2. **Whether the locks and dams in question stay in place or are removed, what are the short and long-term impacts of excess sediment from Pool 1 and Lower St. Anthony, which will be carried downstream into Pool 2, Pool 3, and Lake Pepin? Modeling of sediment transport must be included in the scope of these studies.**

   We would like to refer to a case study known as the Elwha Dam Removal.[2] In 2011, approximately 80-100 years of sediment load was released when the dam was removed. That sediment, estimated at as much as 30 million tons, caused an immediate bed level increase of one meter in the river downstream of the dam. Additional sediment was carried to the mouth of the river, where 70 acres of beach, delta and barrier islands were formed.[3] Luckily that sediment was relatively clean. This is unfortunately not the case at Lock and Dam #1 (see line item 4, below, for more information on the type of sediment currently stored in Pool #1).

   Pool 2, Pool 3, and Lake Pepin cannot survive additional sediment volume, on top of the sediment load already being transported via the Minnesota River and storm drainage systems, as well as increased sediment from the Upper Mississippi River due to recent land use changes from timber to agriculture.

   Flows in the Minnesota River are increasing due to a combination of changes in climate, ground cover, and drainage. The mean daily flow has increased at an alarming rate over the past 60 years. The Minnesota River consumes roughly 80 additional acres of land each year, and the resulting sediment is carried into Pool 2 of the Mississippi River. 80-90% of the sediment entering Lake Pepin is attributed to the Minnesota River.[4]

   It is notable that for the past 10 years, the USACE has removed approximately 70,000 cubic yards per year by dredging the channel above Lock and Dam #1. The additional sediment volume that had been dredged in the past will now be transported downstream, overloading the resources of the downstream pools. This dredging was halted in 2014, so the sediment in Pool 1 has increased unchecked during the last few years.

   Regardless of the original design intent, Pool 1 has historically functioned as a giant sediment trap, as demonstrated by the annual amount of dredge material that has been removed. Above the mouth of the Minnesota River, this sediment has a market value, and has typically been sold. Below the confluence, however, that value is lost due to the addition of silt and mud from the Minnesota River's drainage basin.

   Complete modeling of the impact of sediment transport is required in order to make an informed decision.

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[2] https://phys.org/news/2018-01-elwha-river-mouth.html

[3] https://news.nationalgeographic.com/news/2014/08/140826-elwha-river-dam-removal-salmon-science-olympic/

[4] http://www.lowermnriverwd.org/application/files/2214/9692/8180/Ellison_2014-monitoring-results.pdf

3. **Dredging of the channel in these pools should be reinstated for navigational and public safety purposes, and to reduce the ongoing impact of excess sediment on downstream pools.**

   Our position is that navigation within Pool 1 should be encouraged, not discontinued, and for that navigation to be safe for the public, channel maintenance and aids to navigation need to be restored. This unique urban recreational resource deserves to be used to its full potential. In addition, the dredging of Pool #1, which has been halted in recent years, was another tool for reducing the amount of excess sediment being transported on an annual basis to Pool #2, Pool #3, and Lake Pepin. Recent bathymetric studies indicate that the former 9' deep channel in Pool #1 has been filled in to the point where it is approximately 3-4' deep (within the old channel area) and as shallow as 1' deep outside the channel. That is sediment that was formerly being removed but is now overloading the river system.

4. **100+ years of sediment stored behind Lock and Dam #1 presents an environmental challenge that must be thoroughly analyzed and addressed if there is any chance of the dam being removed.**

   Has the makeup of the sediment stored behind Lock and Dam #1 been thoroughly analyzed, and are there plans to mitigate its contamination by toxic substances such as dioxins, heavy metals, fecal coliform bacteria, etc.?

   When we compare the latest Corps of Engineers' Pool test results from core samples taken in 1980's to the Dredging Material Handbooks of the MPCA, it appears to indicate Tier III sediment. What will be the potential impact on downstream water quality, as well as on water quality in the current Pool #1, which is now being used as a mussel nursery by the DNR?

   It is crucial to consider these issues within the scoping of the EA. Who will pay for any required mitigation of the existing sediment? What are the anticipated costs involved with removal of this sediment? This type of cost estimate also needs to be included in the EA study.

   Sadly, many similar projects have been underfunded, even though contamination was well-documented and accompanied by good intentions. In a popular dam removal project on the Penobscot River, in Augusta, Maine, mercury contamination[5] of the sediment required an infusion of several million dollars of funds from the 2009 Stimulus Package. We are not likely to have a funding package like that available for this project, so we need to plan carefully for any similar expenses.

   Additionally, what can be done to keep further contamination from rural and upriver non-point sources and from the City of Minneapolis's leaky sewer system from entering the River's lower pools?

   Note that the 2016 State of the River Report[6] indicated that the Mississippi River's waters from Coon Rapids through Pool #1 were not recommended for human contact due to the unusually high level of fecal coliform bacteria. As the saying goes, "the solution to pollution is dilution". If dams are removed, that natural dilution effect will no longer be nearly as effective.

[5] https://www.nrdc.org/media/2015/150902

[6] View and/or download the 2016 State of the River report at this link: http://stateoftheriver.com/state-of-the-river-report/

5. **If these facilities are disposed, but not removed, what guarantees can be put in place to ensure that the dams continue to be adequately maintained after disposition, and will this maintenance cost or future removal cost ultimately add to the State's tax burden?**

   Are there options other than shifting to private ownership, such as a transfer to the Corps of Engineers recreational mission, in place of the current navigation mission? If removal is the final selection, who will be responsible for the immediate and long-term costs, whether financial, environmental, or social?

   The USACE's definition of "disposal" can be confusing to a civilian. First, the USACE conducts these studies to determine whether a project that they operate and maintain should be "de-authorized". Then, the Corps decides if the associated property and improvements should undergo "disposal". Disposal means any authorized method of permanently divesting their control and responsibility for that real estate. Ultimately, the U.S. Congress would need to vote to de-authorize a project.

   These studies will determine whether it is in the interest of the Federal government to retain the project for its authorized purposes.

   It is basically a cost/benefit study, evaluating and comparing benefits, costs, and impacts of continued operation, maintenance, and repair, on the one hand, and the costs and benefits of disposal of the property and improvements on the other. We want to ensure that all costs and benefits are considered, not only short-term costs, and not only financial costs.

   Just because an Environmental Assessment Study indicates the need for mitigation doesn't mean adequate funding will be available (see line item 4, above). There is no guarantee that mitigation will take place, or if it does, it may need to be funded by the taxpayers of the State of Minnesota. Is this what our taxpayers want?

   Again, referencing the Elwha Dam removal project mentioned as a case study above in line item 2, removal was originally estimated at a cost of $40-$60 million for both dams. Total actual cost came to approximately $350 million due to expanding scope and unanticipated expenses. That final project included new water treatment plants and massive infrastructure improvements. Who will pay for these eventualities if they are needed in the Twin Cities?

   In a separate case study, the New Savannah Bluff Lock and Dam[7] in Augusta, GA, the dam has not been removed, but decades of deferred dam maintenance have created a nightmare for those communities. The Water Infrastructure Improvements for the Nation Act (the WIIN Act), deauthorized the lock and dam and directed the Army Corps to construct fish passage across the existing dam while maintaining the impoundment of water. In this case, the Federal government has mandated that the dam stay in place but has failed to fund adequate maintenance, leaving the facility in a sort of limbo today.

6. **How would the possible disposition of these properties affect our public safety in the area? Would a decision to remove one or more dams cause possible damages to existing infrastructure and private property?**

   First, protecting the safety of the public is one of our local, state and Federal government's most widely accepted and important functions.

[7] http://www.sas.usace.army.mil/Media/News-Stories/Article/1438784/column-the-fate-of-the-lock-and-dam-in-augusta-but-first-a-little-history/

Due to the recent cessation of channel maintenance and dredging by the USACE in Pool #1, the Coast Guard has been forced to discontinue maintenance of Aids to Navigation. This means they have removed all mile markers and channel markers above the mouth of the Minnesota River in Pool #2, as well as in Pool #1. Significant safety concerns have been raised by the Hennepin County Sheriff's Department, Fire Rescue teams from St. Paul and Minneapolis, and others. These first responders are understandably concerned with their ability to reach citizens in distress in those areas. If there are plans for any type of navigation in these sections of the river, those basic safety measures must be replaced and maintained in some manner.

A recently constructed whitewater rafting course in the Chattahoochee river in Columbus, GA, has demonstrated how new public safety challenges can come along with change. Rafters will periodically drown, of course, but when the river becomes faster and easier to approach from the banks, with strong currents, slippery rocks, and drop-offs, so do non-rafters who are tempted to enter the river at the edges of the whitewater. Even strong swimmers can underestimate the flow rate and danger, causing an increase in drowning deaths. This added liability is a sad consequence of dangerously fast flowing water, and raises the question of who will be responsible for maintaining safety on the river?

Second, dam removal and the accompanying changes to the river would also impact existing infrastructure. Changes to water level, rapid fluctuations in flow rates, increased flows, and the accompanying scouring by current can cause damage or make existing systems obsolete. Storm sewers, bridge foundations, and riverside retaining walls were not designed to be free-standing, and will need to be extended, re-engineered, renovated, or reinforced.

7. **What would be the impact on accessibility to the Mississippi River's resources for a diverse population? In other words, will any proposals allow for continued or enhanced access by taxpayers of all ages, economic status, and physical abilities?**

Friends of Pool 2 believes that an urban river should be accessible to a diverse group of citizens, encouraging as many recreational users as possible. As they currently exist, these urban slack-water pools are available to amateur canoers and kayakers (existing canoe trails, Paddle Share program), bass, walleye and catfish fishermen, large and small excursion/sightseeing boats that are handicapped accessible (Paradise Charter Cruises, Padelford Riverboats, Magnolia Blossom), pontoons, stand-up paddleboarders, cruisers, rowing sculls (University of Minnesota, St. Thomas and Macalester college teams, Minneapolis Rowing Club), Voyageur canoes (Wilderness Inquiry), Urban Boatbuilders, water taxis, dragon boats, houseboats, wakeboarders and water skiers. This diversity should be encouraged, not limited.

In contrast, the users of a whitewater rapids (as envisioned by the "natural state" proponents) would be limited to a small population of highly trained sportsmen, with excellent physical strength and balance skills, in their kayaks or rafts. These water sports aren't undertaken by the average resident.

Also, rafting and kayaking would only be possible during the short seasons when the water is deep enough for these vessels, and when rapid fluctuations in flow rate don't interfere. A "natural" free-flowing river will experience many periods with either too much or too little water, which can make it difficult to use.

8. **What would be the impact of disposition and/or dam removal on slowing or halting the migration of invasive Asian Carp Species, including Silver Carp and Bighead Carp?**

Special attention should be given during the EA process to carefully evaluate this important issue.

We know that certain dams can be useful in slowing the migration of harmful invasive Asian Carp species. This same argument was used not long ago as the primary reason to close the locks at Upper St. Anthony Falls.

We must not forget that dam removal can have unintended consequences by facilitating that upriver migration. It is known that many Asian Carp prefer to spawn in swift water, then return to quiet pools to feed. It is possible that Pool 2 could become a perfect nursery for these invasive species to breed and thrive, and from here they may spread throughout the waters of the State of Minnesota.

9. **Hydroelectric power is currently generated at these dams. If that non-fossil fuel generation is eliminated, how will it be replaced, and who will pay for that replacement?**

   If dam removal is left on the table as an option, the EA should include cost estimates to buy out current FERC licenses, and replace existing hydroelectric power generation with another form of "green" energy, should those facilities be removed. Brookfield has reportedly invested approximately $65 million in just one generation facility, so this anticipated cost would not be a minor item. Note that solar and wind power generation are not continuous, whereas hydroelectric runs 24/7. This removal would have a regional environmental impact connected to power generation which needs to be addressed in these studies.

10. **If dam removal is ultimately chosen as the preferred option, what will the resulting "restored" river look like, and will it be suitable for the anticipated uses?**

    Before a removal option can be realistically evaluated, there will need to be an advanced hydrological model created to demonstrate and predict, to the highest degree of accuracy possible, the results of the removal. Remodeling a river after the fact would not be a simple task, and there is really no directly applicable research on the outcome of dam removal on this scale in a major metropolitan region.

    The rate of flow at Upper St. Anthony Falls varies substantially with the season and the amount of rainfall. Per USGS records, flow rate at the falls rarely drops below the 10,000 feet per second (FPS) mark, and during high water events can exceed 40,000 FPS. As a comparison, the peak flow on the Colorado River in the Grand Canyon is between 12,000 and 18,000 CFS.[8] That range would generally be considered high skill-level rafting and kayaking. Flows exceeding 25,000 FPS would be considered "very high-flow" rafting, something reserved only for experts. Any of these higher rates would probably be inappropriate for inner tube float rides, which rarely exceed 1000 CFS.

Conclusions:

As stated in the introduction, as these studies are prepared, we must keep in mind that the recommendations and actions that stem from the Disposition Study and EA will directly impact the water quality, ecology, hydrology, wildlife habitat, recreational usage, and commercial navigation of downstream sections of the Mississippi River.

We have offered a comprehensive list of comments (see above), with accompanying documentation and supporting information as requested. We appreciate this opportunity and hope that Congress gives due consideration to these important issues.

[8] https://waterdata.usgs.gov/usa/nwis/uv?site_no=09402500

We are proposing that these scoping items be considered as a part of these studies:

- Explore all possible alternatives to allow for maintaining Federal control of the dams through the USACE.
- Examine detrimental effects of excess sediment carried from Pool 1 and above, including a full modeling of the sediment transport elements of potential disposition.
- Reinstate dredging, for navigation, public safety, and to reduce sediment transport to lower pools.
- Analyze and assess the toxic sediment stored behind Lock and Dam #1, which will present an environmental challenge. Include cost estimates for remediation of this toxic material.
- What guarantees can be put in place to ensure that the dams are adequately maintained after disposition?
- How would disposition affect public safety and/or damages to existing infrastructure?
- Encourage more accessibility to the river's resources.
- Will disposition and/or dam removal facilitate the migration of invasive Asian Carp Species?
- How will the disposition address the hydroelectric power currently generated at the dams?
- If dam removal is ultimately chosen, what will the resulting "restored" river look like?

It is worth noting that scores of dam removal projects are pursued each year across the country, some of which are promoted by the American Rivers group, but Lock and Dam #1 would be a project of unprecedented scale and expense. We have to ask, why is this proposal being made for this dam? Do we want our river to become an expensive, decades long, experiment? All of the technical, engineering, and environmental challenges of smaller dam removal projects will be magnified at this, one of the tallest dams on the Mississippi.

As Minnesota taxpayers we all want our taxes spent in cost-effective ways. State funding is limited and needs to be prioritized. We believe that Minnesota residents would prefer to see their tax money spent as currently allocated, or on local infrastructure improvements, rather than spending hundreds of millions of dollars for maintaining and/or removing these dam facilities. It is not out of the realm of possibility that a dam removal project at Lock and Dam #1 would cost well over $200 million. There are plenty of other ways to spend that money that would provide more return on investment for taxpayers.

Of the (2) primary alternatives currently being evaluated by the Corps, our organization strongly prefers the first option, which is to take no action. If Congress and the USACE decide to pursue the second alternative, and deauthorize the navigation mission at these sites, we would prefer to see the facilities remain in the control of the USACE but we suggest that the Corps of Engineers' mission may shift from navigation to recreation at this location.

Apparently one possible outcome of disposition would be to place these Locks and Dams in the care of the GSA. Again, we would prefer to see them remain in the control of the USACE. The past record of the GSA in similar situations has not been promising.

Regarding logistics and schedule, we believe the public should have been made aware of any pending proposals from private, municipal, corporate, or other groups earlier in the disposition study process. Ideally, those proposals should have been solicited and publicized before the citizen input sessions were held. No public good is served by the current schedule, which asks for proposals and public comments simultaneously. Proposals should have been received and shared prior to the public feedback sessions, so that taxpayers could have been better informed going into the study.

The mission of Friends of Pool 2 includes advocating for all river users on the Mississippi River. We currently represent the interests of more than 600 recreational and commercial river users, river-related businesses, marinas, and riverfront property owners, all with intimate knowledge of the river in Pool 2 and adjacent Pools.

Our supporters spend much of their time in close contact with the river, and care deeply about environmental issues within the watershed, which they observe while interacting with the river on a daily or weekly basis. In the past, they have seen the impact of a few ill-advised policy decisions on the conditions along this mighty river and present this document to help avoid any future errors.

In the short term, at a bare minimum, we urge the Corps of Engineers to reinstate dredging of the channel above Lock #1, in the same way dredging had been done prior to the closure of the Upper St. Anthony Lock. At a minimum, this will alleviate some of the pressure of excess sediment being carried to lower pools, and at the same time address a few of the current public safety and navigation issues in Pool #1.

We have attempted to summarize in this document many of the concerns of the members and supporters of Friends of Pool 2 in this document, and we anticipate there will be questions from the USACE and others going forward. We will happily make ourselves available to respond to any questions and would also be pleased to offer boat tours of Pool 2 or any other areas of the river at your convenience.

For more information, please feel free to visit our website at www.FriendsofPool2.org. You may also contact us via our Facebook page, or directly through our email address, which is: info@FriendsofPool2.org

This document was created by the Disposition Study Subcommittee for Friends of Pool 2.

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