



## United States Department of the Interior

NATIONAL PARK SERVICE  
St. Croix National Scenic Riverway  
401 Hamilton Street  
St. Croix Falls, Wisconsin 54024-0708

IN REPLY REFER TO:

July 28, 2009

L7615 (SACN)

Mr. Bob Cupit  
Manager, Energy Facility Permitting  
Minnesota Public Utilities Commission  
121 - 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

Dear Mr. Cupit:

The National Park Service (NPS) is writing to express concern about the Sunrise River Energy Station proposed by LS Power and its potential effect on the St. Croix National Scenic Riverway (Riverway). We understand that LS Power will soon be filing an application for a permit for the project from the Public Utilities Commission (PUC).

The Sunrise River Energy Station would be located along the Sunrise River in Lent Township, Chisago County, Minnesota. It would be a natural gas-fired generating facility with an electrical output of up to 780 megawatts, requiring up to 5 million gallons of water per day for cooling purposes. The primary supply of cooling water is to be effluent from a nearby wastewater treatment plant. However, the backup supply would be from a groundwater aquifer, specifically the Mt. Simon Hinckley Formation. We understand that much of the cooling water would evaporate, but some would be discharged to a tributary of the Sunrise River.

The Sunrise River is a tributary of the St. Croix River. The St. Croix National Scenic Riverway is a unit of the National Park System and a component of the National Wild and Scenic Rivers System designated under the Wild and Scenic Rivers Act (the Act) (Public Law 90-542). The St. Croix was one of the first eight rivers to be designated when the Act was passed in 1968. The purpose of designation under the Act is to protect and enhance the river's water quality and its outstandingly remarkable scenic, recreational, natural, and cultural resources for enjoyment by present and future generations. Among the Riverway's outstandingly remarkable natural resource values is its aquatic resources, including the greatest diversity of native mussel fauna in the upper Mississippi River system and excellent smallmouth bass fishing.

The Sunrise River Energy Station would be located approximately 7 river miles upstream of the confluence of the Sunrise River and the St. Croix River. The NPS is concerned that the Sunrise River Energy Station could have the potential to adversely affect the aquatic and recreational resources of the Riverway. The St. Croix River is a surface expression of groundwater and we are concerned that drawing water from aquifers could affect its supply of water. In addition, we

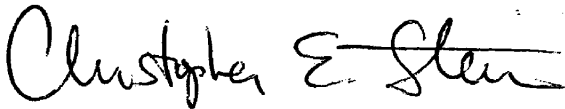
are concerned that warmed and possibly polluted water from the energy station could be discharged to the Sunrise River and flow into the St. Croix River, adversely impacting aquatic habitat.

Given the potential impact on resources of national significance and the uncertainties about the effects, the NPS believes that an environmental impact statement (EIS) should be prepared before the PUC reaches a decision on the proposed Sunrise River Energy Station. The EIS should include a full accounting of the following:

1. all permits needed for every aspect of the project, including Federal, State, and local permits;
2. an analysis of potential impacts to the St. Croix National Scenic Riverway, including the impact on water quantity and quality, recreation, and fish and wildlife values; and
3. an analysis of cumulative impacts that could arise from reasonably foreseeable actions such as additional electric transmission lines or pipelines.

Thank you for the opportunity to express our concerns. Please place us on the mailing list for this project. If you have any questions, please call Jill Medland of my staff at 715-483-2284.

Respectfully,



Christopher E. Stein  
Superintendent

cc:

Bill Storm  
Minnesota Office of Energy Security  
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St. Paul, MN 55101

Mr. Blake Wheatley  
Assistant Vice President  
LS Power Development, LLC  
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bcc:

Dan Willius, President  
St. Croix River Association

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Friends of the Sunrise River