

Thank you for your comment, Michele Pluta.

The comment tracking number that has been assigned to your comment is GLMRIS2AP50070.

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Attachment: WPL Comment Submission GLMRIS Portage WI Reports Dec21 2012.pdf

Comment Submitted:



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December 21, 2012

GLMRIS Focus Area 2
Summary Report Comments
1776 Niagara Street
Buffalo, NY 14207-3199

Subject: *Comments of Wisconsin Power and Light Company (WPL) on the Proposed Focus Area 2 Wisconsin Assessment Reports: Portage Upstream and Portage Downstream and Canal (Submitted electronically)*

Dear Sir or Madam,

On November 27, 2012, the U.S. Army Corps of Engineers (USACE) released for public comment eight draft Aquatic Pathway Assessment Reports for the State of Wisconsin. The purpose of each report is to evaluate and estimate the likelihood of an aquatic pathway forming between the Great Lakes and Mississippi River basins. These reports assess available evidence to review the possibility of aquatic nuisance species (ANS) reaching the adjacent basin, as part of the Great Lakes and Mississippi River Interbasin Study (GLMRIS). Equally important, these pathway assessments include a list of potential actions or opportunities that might prevent or reduce the probability of ANS transfer occurring between the basins.

WPL respectfully submits the following comments on two of the Wisconsin reports, including the "Portage Upstream Report" and the "Portage Downstream and Canal Report". More specifically, WPL is requesting revisions to better reflect the current status of a Fishway Prescription at the Prairie du Sac (PDS) Hydroelectric Facility as well as the potential threat that construction of the fish passage poses to the spread of Asian Carp through the introduction of this pathway.

The PDS dam currently serves as the most effective barrier to the possible spread of Asian Carp to the Upper Wisconsin River and Great Lakes. These draft reports have not adequately conveyed the significant risks that the fish passage could cause even when operated with precautionary measures. Furthermore, WPL recommends that these draft reports should specifically identify maintenance of the existing PDS dam without the fish passage as a major opportunity to prevent or greatly reduce the potential spread of ANS including Asian Carp.

WPL owns and operates the PDS Hydroelectric Facility in Prairie du Sac, Wisconsin. In July 2002, the Department of Interior (DOI) issued a Fishway Prescription requiring WPL to construct a fish passage to open long-closed migration pathways for lake sturgeon, paddlefish, and other native species. The passage is currently in the design phase and is scheduled for operation by July 2015.

WPL has carefully coordinated with the Wisconsin Department of Natural Resources (WDNR) and the US Fish and Wildlife Service (FWS) on the design of the passage. Since the time of the Fishway Prescription, Asian Carp have spread rapidly. Federal and state governments are deploying substantial resources to protect the Great Lakes from Asian Carp as the impact would be devastating environmentally, ecologically, and economically. As documented in these draft reports, in 2011 Asian Carp were collected in the Wisconsin River at the base of the PDS dam.

WPL Comments on Proposed Focus Area 2 Wisconsin Assessment Reports

WPL has reviewed the Portage Upstream (Columbia County) and Portage and Canal Downstream (Columbia County) reports and does not believe that these accurately reflect the current status of the fish passage project and underestimate the level of risk associated with a potential fish passage at the PDS Hydroelectric Facility. While the reports were to be developed in coordination with federal, state and local partners, only the viewpoints of agency staff appear to be included regarding the future PDS fish passage operation.

WPL's concerns have not been accurately represented in these reports. WPL is concerned that the potential fish passage could enable the spread of Asian Carp and notes that this concern has not yet been included in these reports. WPL notes that the fish passage creates a new potential migration pathway. Thus, these draft reports should be updated to reflect how this poses significant new risk to the spread of Asian Carp. WPL believes that even if the PDS fish passage sorting facilities are carefully designed, constructed and operated by well-trained biologists, there is no way to assure with 100% certainty that Asian Carp (or other ANS) will not migrate inadvertently via this new linkage. The draft reports insufficiently characterize these risks, which may include unforeseen accident, unplanned disaster, and potential human error.

Accordingly, WPL believes that the draft reports have relied on limited viewpoints in this matter and as a result, portions of the reports should be revised to more accurately reflect the current status and uncertainties surrounding the operation of the proposed PDS fish passage. WPL requests revision to the relevant passages of these reports as summarized in Tables 1 and 2 below. Moreover, WPL recommends that USACE consider identifying maintenance of the PDS dam without the fish passage as a potential opportunity that could prevent or reduce the probability of ANS transferring between the basins.

Table 1 – WPL Recommended Revisions to Portage Upstream Report

Section	Page	Suggested Revision (deletions and insertions)
3.7.2	35	<p>Aquatic habitat leading from the Mississippi River up the Wisconsin River to the pathway site is high-quality and unobstructed except for the presence of the Prairie du Sac Dam. The Prairie du Sac Dam is about 25 river miles (40 km) downstream from Portage and is a power generating facility. There is about 38 feet (11.5 m) of head at the dam and it currently is an effective barrier to fish passage. A fish passage project is currently being designed discussed for Prairie du Sac Dam that would rely on manual sorting procedures to pass where only desirable species (e.g., lake sturgeon, blue sucker, paddlefish). would be allowed to Final design plans and decisions on operation have not yet been completed. However, the basic premises for the fish passageway have been agreed upon amongst resource agencies and the dam owner/operator. The upstream passage will be a fish lift where all fish entering the lift will be examined and sorted by trained biologists, and no Asian carp (or other ANS) will be allowed to pass upstream of the dam. The lift and fish sorting process will have detailed quality control plans and redundancy to prevent accidental passage of ANS. This will likely include three different steps where the fish will have to be examined, double checked, and manually moved between tanks before they will be released into a flume which deposits the fish into Lake Wisconsin (J. Lyons—WDNR, Personal Communication, October 9, 2012).</p>
4.2.1	44	<p>Passage of Asian carp upstream of the Prairie du Sac Dam is unlikely because it is reported to currently be a complete fish barrier by the WDNR due to its high hydraulic head (38 feet or 11.6 m) and lack of fish passage. A fish passage project is currently being discussed for Prairie du Sac Dam that would rely on manual sorting procedures to pass only desirable species (e.g., lake sturgeon, blue sucker, paddlefish). Final design plans and decisions on operation have not yet been completed. There is uncertainty and risk associated with the fish passage operation and its ability to eliminate movement of Asian Carp or other ANS upstream of the Prairie du Sac Dam, including: unforeseen accident, unplanned disaster, and potential human error. Final design and operational plans for the fish passage may attempt to minimize, but cannot foresee or completely eliminate all of these potential issues. However, fish passage at this dam is planned for construction with an estimated completion date of 2015. Final design plans for fish passage at Prairie du Sac Dam have not yet been completed. However, the basic premises for the fish passageway have been agreed upon amongst resource agencies and the dam owner/operator. The upstream passage will be a fish lift. All fish entering the lift will be examined and sorted by trained biologists and no Asian carp (or other ANS) will be allowed to pass upstream of the dam. The lift and fish sorting process will have detailed quality control plans and redundancy to prevent accidental passage of ANS. This will likely include three different steps where the fish will have to be examined, double checked, and manually moved between tanks before they will be released into a flume which deposits the fish into Lake Wisconsin (J. Lyons—WDNR, Personal Communication, October 9, 2012). Operation of this fish passage to only pass desirable species (e.g., paddlefish, blue sucker, lake sturgeon) would nearly eliminate it as a potential vector for Asian carp to move upstream of the Prairie du Sac Dam. The results of this pathway assessment are being shared with WDNR for their consideration in the final design and operation of this proposed fish passage project.</p>

Table 2 – WPL Recommended Revisions to Portage Downstream and Canal Report

Section	Page	Suggested Revision (deletions and insertions)
3.7.2	37	<p>Aquatic habitat leading from the Mississippi River up the Wisconsin River to the pathway site is high-quality and unobstructed except for the presence of the Prairie du Sac Dam. The Prairie du Sac Dam is about 25 river miles (40 km) downstream from Portage and is a power generating facility. There is about 38 feet (11.5 m) of head at the dam and it currently is an effective barrier to fish passage. A fish passage project is currently being designed discussed for Prairie du Sac Dam that would rely on manual sorting procedures to pass where only desirable species (e.g., lake sturgeon, blue sucker, paddlefish). Final design plans and decisions on operation have not yet been completed. However, the basic premises for the fish passageway have been agreed upon amongst resource agencies and the dam owner/operator. The upstream passage will be a fish lift where all fish entering the lift will be examined and sorted by trained biologists, and no Asian carp (or other ANS) will be allowed to pass upstream of the dam. The lift and fish sorting process will have detailed quality control plans and redundancy to prevent accidental passage of ANS. This will likely include three different steps where the fish will have to be examined, double checked, and manually moved between tanks before they will be released into a flume which deposits the fish into Lake Wisconsin (J. Lyons—WDNR, Personal Communication, October 9, 2012).</p>
4.1	43	<p>However, discussions with WDNR indicate that there is a proposed fish passage project at this dam being designed, which is discussed in greater detail under Asian carp in the following section. All unwanted species, including Asian carp, will not be allowed to pass upstream of the dam.</p>
4.2.1	46	<p>Passage of Asian carp upstream of the Prairie du Sac Dam is unlikely because it is currently reported to be a complete fish barrier by the WDNR, presumably due to its high hydraulic head (38 feet or 11.6 m) and lack of fish passage. A fish passage project is currently being discussed for Prairie du Sac Dam that would rely on manual sorting procedures to pass only desirable species (e.g., lake sturgeon, blue sucker, paddlefish). Final design plans and decisions on operation have not yet been completed. There is uncertainty and risk associated with the fish passage operation and its ability to eliminate movement of Asian Carp or other ANS upstream of the Prairie du Sac Dam, including: unforeseen accident, unplanned disaster, and potential human error. Final design and operational plans for the fish passage may attempt to minimize, but cannot foresee or completely eliminate all of these potential issues. However, fish passage at this dam is planned for construction with an estimated completion date of 2015. Discussion with WDNR indicates that this operation may be in the form of a lift system with manual sorting, but specific details were not yet available on its proposed design and operation. Assuming it is to be operated for only passing desirable species (e.g., paddlefish, blue sucker, lake sturgeon), this would nearly eliminate the potential for Asian carp to move upstream of the Prairie du Sac Dam. The results of this pathway assessment are being shared with WDNR for their consideration in the design and operation of this proposed fish passage project.</p>

WPL appreciates this opportunity to provide input to the USACE on these preliminary Focus Area 2 Wisconsin Assessment Reports. It is our understanding that USACE will review and incorporate public input before finalizing and re-issuing the reports early 2013. Thus, WPL requests that the potential uncertainties and risks of the PDS fish passage be presented as such in issuance of the final reports and considered for further study by the USACE. If you have any questions on our public comment submittal, please feel free to contact me at (319) 786-4440.

Sincerely,

A handwritten signature in blue ink that reads "D. R. Kopp". The signature is written in a cursive, slightly slanted style.

Doug Kopp
Director – Environmental Affairs