

August 9, 2013

The Honorable Sally Jewell United States Secretary of the Interior 1849 C Street N.W. Washington, D.C. 20240

Dear Secretary Jewell,

We write to express our strong concerns regarding the addition of a fishway requirement to the Prairie du Sac Hydroelectric Facility (PDS) operating license. As the United States Fish and Wildlife Service conducts a review of options for species management in the Wisconsin River and Lake Wisconsin related to this facility, we request a full review of the potential impacts regarding invasive species and viral hemorrhagic septicemia (VHS) disease.

The PDS, which is owned by Wisconsin Power and Light Company (WPL), is a 29-megawatt hydro-electric generating station located on the lower Wisconsin River one mile north of the Village of Prairie du Sac and 90 miles upstream from the Wisconsin River's intersection with the Mississippi River. WPL has owned and operated the PDS since 1922. It is regulated by the Federal Energy Regulatory Commission (FERC) and currently operates under a 30-year license.

We understand that WPL is required to install a fish passage at the PDS and to have it operational by July 1, 2015. The goal of the fishway is to provide for safe, timely, and effective fish passage at the PDS for a variety of native fish species including paddlefish and sturgeon.

However, the PDS currently functions as a permanent barrier to upstream movement of invasive species including Asian Carp. None of the invasive species that are established in the Mississippi River Basin are currently known to exist upstream of the facility, however, Asian Carp have been captured just below the PDS each of the past three years.

The established presence of Asian Carp below PDS raises significant concern that Asian Carp could penetrate above the protective wall of the facility if a fishway is installed. Opening a pathway for invasive species that are present below PDS to move upstream would cause significant adverse effects on the environment and surrounding watersheds.

As you are well aware, Asian Carp have been known to dominate entire streams, effectively pushing out native species, posing a threat to the local aquatic environment and related economy. The U.S. Army Corps of Engineers expressed concern that if Asian Carp reach the Great Lakes, they may negatively impact the \$7 billion annual fishing industry. Even if they are kept out of the Great Lakes, continued spreading throughout the Mississippi and Wisconsin River watersheds could devastate our fresh water ecosystems and threatens the industries that rely on

them. This issue is especially timely given the Obama Administration's announcement of a series of new measures to protect the Great Lakes from Asian carp through the 2013 Asian Carp Control Strategy Framework.

Therefore, as USFWS develops its Environmental Assessment (EA) of the fishway, we strongly encourage you to perform a robust study that considers all potential alternatives to a fishway that are consistent with protecting the fish populations above the dam from invasive species.

Additionally, we are concerned by the threat of VHS disease being spread to Lake Wisconsin should a fishway be required at the PDS. The fishway will require pooling of fish into a collector which enhances the spread of the virus among fish clustered together in transit from one side of the dam to the other.

In light of these concerns and as the USFWS develops an EA on the fishway prescription at PDS, we strongly encourage your department to consider alternatives to the proposed fishway through a comprehensive NEPA study. Thank you for your consideration of this request and we look forward to your prompt response.

Sincerely,

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Cc: Daniel M. Ashe, Director, U.S. Fish and Wildlife Service Tom Melius, U.S. Fish and Wildlife Service Midwest Regional Director Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission