

Attachment 9

Rapide Croche Boat Transfer and Aquatic Invasive Species (AIS) Cleansing Station
Environmental Analysis Document Comment Summary

How was the Environmental Analysis Document media release distributed?

DNR followed protocol under Wis. Adm. Code NR 150, Environmental Analysis and Review Procedures, for distribution of the media release and put the release on DNR's website. In addition to the media release a public information meeting and public hearing was held.

Why was the Environmental Analysis Document prepared?

DNR prepared the Environmental Analysis Document due to concerns regarding Aquatic Invasive Species (AIS).

This proposal should include an educational visitor's center for AIS.

The document states the Fox River Navigational System Authority (FRNSA) does plan on developing an education center that teaches boaters and anglers about the prevention and consequences of AIS. The AIS education center is shown on Attachment 3, Site Development Plan.

Since the boaters that would use the boat transfer and AIS cleansing station often travel in groups there should be moorage above and below the boat the station.

The document mentions construction of regress/egress piers and Attachment 3, Sight Development Plan, shows potential locations for moorage. Exact location of possible moorage would be discussed with DNR should the FRNSA apply for permits.

The media release incorrectly translated Rapide Croche as Eighth Rapids. The correct translation is Fast Hook or Fast Bend.

The DNR notes the correction.

The proposed AIS treatment system cannot stop all AIS from moving upstream. Human error or power outages could lead to AIS transportation upstream.

The document states in the Environmental Consequences section that the proposed AIS treatment system is more effective at controlling AIS than simply transferring boats over the dam or trailering boats around the dam, but cannot guarantee one hundred percent effectiveness. Further in the Significant of Risk section the document discusses the risk of AIS moving upstream of Rapide Croche dam and other environmental concerns if the treatment system is not properly monitored, operated, and managed or if there is a failure in the electrical or mechanical systems.

The proposed temperature of 110 °F for the water bath is too low and is below other temperature recommendations such as the WDNR's Interim Protocol, the ANS Task Force recommendations.

The document recognizes the proposed temperature is below other AIS control temperature recommendations in multiple sections and states the temperature difference may be a risk to the effectiveness of the cleansing system. The document also recognizes that the proposed cleansing system has a longer contact time with the heated water than other higher temperature AIS treatment recommendations.

How will the water temperature be maintained as it is flushed through a boats internal components that come in contact with water?

The document states the hot water bath will require a water recirculation system and an inline electric or natural gas heating system that will maintain the temperature in the bath. The water being flushed through the internal components of the boat will be from the heated water bath. If the temperature of the water moving through the internal components of the boat drops below 110°F the effectiveness of the AIS treatment will be reduced. Proper monitoring of the water temperature will be needed to minimize the risk of temperature fluctuations.

There are other ways for AIS to be transferred upstream of Rapide Croche dam aside from the proposed boat transfer and AIS cleansing station. How are they being controlled?

The document discusses other ways AIS can move upstream. Much of the controls for AIS transport involve voluntary methods. Signs posted at boat landings, AIS information pamphlets, human presence at boat landings, and public service announcements are some of the methods used to try and control the spread of AIS. Wis Admin. Code NR 40, Invasive Species Identification, Classification and Control, does allow for enforcement action if necessary, but education and sharing information are more common methods of addressing AIS.

The environmental document mentions the potential for damage to the banks of the Fox River immediately upstream of the lock, but what about the rest of the System?

The retrofitting and reopening of the rest of the locks on the river will allow large boats to access all pools along the Lower Fox River even if no boats are passed over the Rapide Croche lock via the transfer system. The boat wakes will likely result in some river bank erosion, but it would be very difficult if not impossible to isolate and assess additional impacts from boats utilizing the transfer station

The document discusses the potential damage to the banks of the Fox River in susceptible areas due to wake waves from additional traffic in the Environmental Consequences section. The document states the physical and visual effects of the predicted 1,300

additional boats in comparison to the thousands of boats already using the Lake Winnebago system would be negligible. It also discusses ways such as installation of energy absorbing measures or boat speed rules as ways to help minimize the effects of waves and wakes on the banks.

Items listed as “potential” under the “Summary of Adverse Impacts That Cannot Be Avoided” section which have mitigation factors should not be included.

Mitigation of a particular issue does not mean that the impact is avoided. Mitigation may help to minimize the effects of the impact, but the potential for the impact is still there.

Staff need to be trained and knowledgeable on AIS. What happens if staff cannot be onsite?

The DNR agrees that the staff need to be trained in not only how to operate the transfer/cleansing station, but also in AIS identification and disinfection. Understanding the ecology/biology of AIS will allow for a more comprehensive cleaning technique. The document states the station will have posted hours and will not operate unless a trained staff member is present. The facility will be fenced such that no one may pass through the boat transfer station including canoes and kayaks, when station staff is not present.

Introduction of larger watercraft will exacerbate user conflicts between smaller powered and non-powered boats.

The document recognizes the potential for increased user conflicts and notes that Fox River is part of the Fox-Wisconsin Heritage Water Trail and recently designated as part of the National Recreational Trail system.

How much will it cost to build, operate and maintain this project? Where will the money come from?

The Preliminary Engineering Study for this project estimates \$3.8 million to construct the Rapide Croche boat transfer and AIS cleansing station. \$2 million will come from the FRNSA funds and the balance will come from grants and fund-raising.

The Preliminary Engineering Study for this project estimates an annual operation and maintenance cost of \$77,000.00. It is anticipated the fees will largely offset these operation and maintenance costs.

The FRNSA annually budgets funds for the operation and maintenance of all the locks. The now defunct Fox River Management Commission was granted annual funding by the state of Wisconsin of \$125,400.00 to offset operational costs of the navigation system. Those funds are now received by the FRNSA. Operational costs are supplemented by lock fees collected by the authority and from the FRNSA invested funds.

The FRNSA Management Plan submitted to the DOA budgets funding for construction, maintenance, and operations that comes from the interest earned on investments of the initial funds received by the State of Wisconsin from the federal government when the Corps of Engineers transferred the navigation system to the state of Wisconsin in 2004, local fundraising, a one-time match sum from the state, and a federal match that was contingent upon the success of local fundraising. Investment practices of these funds by the community foundations in Winnebago, Outagamie, and Brown counties and the FRNSA board has resulted in a sum sufficient to restore, operate, and maintain the navigation system past 2034, and will still provide funds that will allow abandonment of the navigation system if that becomes necessary.

How much usage will the Boat Transfer and AIS Cleansing Station actually have?

The document discusses the St. Norbert's 2010 Survey conducted for the FRNSA which predicts 1300 boats would use the system annually. The DNR is not aware of any additional information that addresses the amount of potential usage of this system.

What is the economic impact of the proposal?

The document discusses the potential for an increase in the local economy due to the construction, user fees and additional recreational related spending of the increased boaters upstream. There is reference to the 2011 National Survey of Fishing, Hunting and Wildlife-Related Recreation, which found that the average WI fisherman spends \$29 per day. While it is possible not all of the predicted 1300 boats using the Rapide Croche Boat Transfer and AIS Cleansing system will be for angling purposes there is potential for other spending such as food or fuel.

There is concern of the potential economic impact of the Lake Winnebago system should AIS be transferred upstream of the Rapide Croche dam.

The DNR shares this concern and the document discusses how AIS can be transferred upstream from Rapide Croche dam and the potential economic and biological effects should AIS move upstream in the Environmental Consequences section. Whether AIS would get past the Boat Transfer and Cleansing Station or it moves upstream via another vector (i.e. boat ramps) the potential adverse economic and biological effects are great.