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December 21, 2018

Ms. Maryalice Fischer, Certification Program Director
Low Impact Hydropower Institute
329 Massachusetts Avenue, Suite 2
Lexington, MA 02420

RE: Low Impact Hydropower Institute (LIHI) Recertification for Kingsley Dam Hydroelectric Project, Nebraska, LIHI Certificate #37

Dear Ms. Fischer:

This letter is in regard to the Low Impact Hydropower Recertification Application package submitted by the Central Nebraska Public Power and Irrigation District (Central) for the Kingsley Dam Project in Nebraska (LIHI Certificate #37). Staff of the Nebraska Game and Parks Commission (Commission) have reviewed the information available on LIHI's website, and we offer the following comments.

Fish Passage

While the structures (i.e., dams, canals, powerhouses, etc.) within Central's hydroelectric and irrigation supply canal system do not prevent any fish species from completing their lifecycles, they do fragment native fish populations and prevent intermixing of genetics within species. Despite this, some of the structures can have a positive effect by reducing the likelihood of invasive species (i.e., Asian Carp) from moving further upstream.

Kingsley Dam reduces the movement of fish species out of Lake McConaughy, which assists our agency with maintaining a quality sport fishery in that lake. Lake Ogallala can support a quality trout fishery at times. However, during releases from Kingsley Dam, some non-game fish move downstream, which can have a negative impact on the trout in Lake Ogallala.

Water Quality

Low levels of dissolved oxygen (D.O.) have caused fish kills in Lake Ogallala. Based on the Total Maximum Daily Load (2007) and Water Quality (2012) reports for Lake Ogallala, there have been certain times and locations in the lake when over 60% of the samples had D.O. levels < 3.0 ppm. Central has taken steps over the years to address low D.O., but this continues to be an area of concern for Commission staff. We would welcome any opportunity to work with Central and other entities as appropriate to improve water quality in Lake Ogallala. Regardless, we acknowledge Central is technically in compliance with criteria set forth by the Nebraska Department of Environmental Quality (NDEQ) at this time, and that NDEQ concluded pollution entering the lake from upstream waters was the major cause of low D.O., not operation of Kingsley Dam.

TIME OUTDOORS IS TIME WELL SPENT

OutdoorNebraska.org

Other LIHI Criteria

Central's system creates numerous outdoor recreational opportunities and attracts a variety of users, such as anglers, bird watchers, boaters and campers. Recreational use, ecological flow regimes, shoreline protection, and threatened and endangered species are all managed through a variety of plans, which Central has developed in coordination with the Commission as well as other entities.

Overall, it appears Central meets the criteria set forth by the LIHI for recertification. We appreciate the opportunity to provide comments. If you have questions regarding the content of this letter or need additional information, please feel free to contact me via phone (402-471-5438) or email (michelle.koch@nebraska.gov).

Sincerely,



Michelle R. Koch
Assistant Division Administrator
Planning and Programming Division

ec: Don Kraus, General Manager, CNPPID
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