



David Reinhart <comments@cardinalhickorycreekeis.us>

Proposed power line

1 message

Sue Gardner [REDACTED]
To: comments@cardinalhickorycreekeis.us

Tue, Oct 29, 2019 at 7:15 PM

I urge the Fish and Wildlife Service to require further consideration and evaluation of alternative routes if this line is deemed necessary to be built at all. I strongly oppose the plan of crossing the upper Mississippi River floodplain habitat which is vital for wildlife, fish and migrating birds as well as being a critical wetland. We must not further impinge upon these extremely important natural areas.

Thank you for your attention.

Sent from my iPad



David Reinhart <comments@cardinalhickorycreekeis.us>


Final EIS comments

1 message

Aimee Gauger [REDACTED]
To: comments@cardinalhickorycreekeis.us

Fri, Nov 8, 2019 at 10:37 AM

Please see attached comments for the record.
Thank you
Aimée Gauger
[REDACTED]

 **LTE and RUS 11-8-19 copy.pages**
299K

I am opposed to Cardinal Hickory Creek 345-kv transmission line project.

Clearcutting/spraying acres of land beneath the wires would lead to disruption in our established ecosystems. Between the poisoning and resulting invasive vegetation, the plants, animals and insects would not have a chance. Also improper "pruning" of oaks could contribute to the spread of oak wilt disease.

It also has been revealed that devastating fires in California have been caused by high voltage (bare wire) power lines.

Just imagine 50 foot holes dug into the earth to receive tons of concrete for each tower base. It would be such a disruption of soil/water patterns, not to mention a huge waste of resources and energy!

How about farmers plowing in unworkable patterns to avoid the towers, while worrying about stray voltage killing their animals?

Do you think it is okay to run these lines across school grounds in Mount Horeb and Barneveld?

If we truly needed this line, it might be worth the trouble, BUT the experts in the field have determined that it is NOT needed. The Public Service Commission's own staff of professionals came up with a viable plan to reconfigure existing power lines to carry the load. The three members of the PSC whose charge it is to make the decision tossed their idea away, quickly voting to approve the expansive project.

Why are we making a beeline toward this project? Some say it is to ensure the passage of clean energy from wind and solar. Anyone who has a solar system on their home knows about the value and effectiveness of small energy grids. If an evil force wanted to cripple our country, wiping out a power line would go a long way, literally. The military traditionally has depended on small energy grids that sustain less damage if attacked and can be repaired more quickly.

I believe this project is more about rewarding investors than it is about serving us consumers. Energy use is proven to be flat. Most of us are using energy-efficient appliances, lighting, etc. Now we are being told to pay for this unwanted outdated technology.

We do not need this invasion of huge towers across our beautiful Driftless landscape, which is revered internationally and treasured locally. Is there still time to alter the path forward? I can only hope.

Sincerely,

Aimée Gauger

11-8-19



David Reinhart <comments@cardinalhickorycreekeis.us>

Re: Notice of Availability and Public Comment Period for the Cardinal-Hickory Creek 345-kV Transmission Line Project Final Environmental Impact Statement

1 message

TCP Chair [REDACTED]

Wed, Oct 23, 2019 at 8:28 PM

To: Comments <comments@cardinalhickorycreekeis.us>

Tura

I think its a major uphill fight — thought locals put on a good case to PSC and it fell on deaf ears — can't imagine Trump Admin will want to find a issues.

Greg

On Oct 18, 2019, at 8:58 AM, Comments <comments@cardinalhickorycreekeis.us> wrote:

Dear Stakeholder:

The U.S. Department of Agriculture, Rural Utilities Service (RUS) is announcing the availability of the Cardinal-Hickory Creek 345-kV Transmission Line Project (C-HC Project) Final Environmental Impact Statement (EIS). The EIS evaluates environmental impacts of construction and operation of the C-HC Project, which would extend approximately 125 miles, connecting Dane County, Wisconsin and Dubuque County, Iowa (see enclosed figure). RUS has considered all comments received on the Draft EIS and used input provided by government agencies, private organizations, and the public in the preparation of the Final EIS.

RUS initiated the National Environmental Policy Act (NEPA) process for the C-HC Project in October 2016. Public scoping meetings were held throughout the project area in October, November, and December 2016. RUS published the Notice of Availability for the Draft EIS on December 17, 2018. Public meetings were held throughout the project area in March 2019. The scoping report, Draft EIS, Final EIS, and other documentation can be found on the RUS website:

<http://www.rd.usda.gov/publications/environmental-studies/impact-statements>

RUS is releasing the Final EIS for a 30-day public review period, as part of the federal environmental review process required by NEPA and NHPA. Following the 30-day review period for the Final EIS, RUS will prepare a Record of Decision. Comments must be received or postmarked 30 days from publication of the U.S. Environmental Protection Agency's notice of availability of the Final EIS in the Federal Register (estimated to be published on October 25, 2019). There are two ways to provide comments for the FEIS:

1. Email written comments to: comments@CardinalHickoryCreekEIS.us
2. Mail comments to: SWCA Environmental Consultants

Attn: Cardinal-Hickory Creek EIS
[80 Emerson Lane, Suite 1306](#)
[Bridgeville, PA 15017](#)

Public comments become part of the project's official administrative record.

For further information about the Final EIS, contact:

Dennis Rankin
Rural Utilities Service Project Manager
202-720-1953
dennis.rankin@usda.gov

Additional information about the project can be found on the Utilities' website:

<http://www.cardinal-hickorycreek.com/>

Sincerely,

Barbara Britton
Director, Water Programs Division
Water and Environmental Programs
USDA, Rural Utilities Service
(202) 720-1649
barbara.britton@usda.gov



David Reinhart <comments@cardinalhickorycreekeis.us>

Transmission Lines

1 message

Rick Jensen [REDACTED]

Sat, Oct 19, 2019 at 12:25 PM

To: "comments@cardinalhickorycreekeis.us" <comments@cardinalhickorycreekeis.us>

The main reason for my opposition to these transmission lines is that they are NOT needed. The energy usage in Madison is either flat or decreased due to better conservation. Wind and solar power are increasing in usage in the region and should be encouraged with financial incentives. The high voltage transmission lines are outdated energy. Only the Utility Companies stand to gain financially from this project: customers in this area will be bearing most of the cost. The damage to the environment, the wildlife, and possibly water quality will be irreparable. This unique scenic area relies on tourism: this will have a large negative impact on the local economy and property values. Those of us who chose to live here for the natural beauty of the Driftless Region implore you to stop this unnecessary project that will change the landscape as well as the quality of life for generations.

Leslie Jensen
[REDACTED]



David Reinhart <comments@cardinalhickorycreekeis.us>

Cardinal-Hickory Creek

1 message

Rick Jensen [REDACTED]
To: comments@cardinalhickorycreekeis.us

Sat, Oct 19, 2019 at 6:48 AM

As I write this short review the cynicism in me rises. I have felt for some time that minds have been made up and the almighty dollar wins again. Cardinal-Hickory will go through regardless of so many legitimate protestations.

Regardless, the project does not help Wisconsin energy end users. It is a dollar grab for special interests and that does not speak well for oversight agencies that are suppose to be looking out for our consumer interests.

The Driftless Area is priceless and once you go down this blight on the landscape you can't go back.

Farmers and property owners will be negatively impacted both visually and through property values that will go down. That can also impact tax revenue in the long run.

Even though this decision has been dragged on for years, giving the impression that it is well thought out, at it's core it remains a short sited, and bad enterprise at it's core.

Rick Jensen
[REDACTED]
[REDACTED]

Sent from my iPhone



David Reinhart <comments@cardinalhickorycreekeis.us>

Cardinal Hickory Creek EIS comment

1 message

I k [REDACTED]
To: comments@cardinalhickorycreekeis.us

Mon, Nov 25, 2019 at 5:39 PM

November EIS letter 2019

In the discussion of the impact of weather on the towers, the report relies on NOAA data from 1980-2006, which makes no sense, given the rapidly changing and uncharacteristic weather patterns caused by climate change. As for the impact of herbicides on our environment... the EIS insists the utilities use regulated chemicals without acknowledging the ongoing SWIGG groundwater study that shows well contamination from those very chemicals in Grant, Iowa, and Lafayette counties.

Not far from me are the 540 acres of the Ridgeway Pine Relict State Natural Area which almost borders the proposed line and currently has a pristine, well functioning major wetland. It has been important with its wetland to act as a sponge for the heavy precipitation throughout Southwestern Wisconsin. Without its sponging wetland, even more of the heavy rains would have contributed to raging flooding of farm lands. I will also add that the ongoing disturbance so close to this wetland from ATC transmission line construction, continuing tree cutting, spraying pesticides to rid perennial plants, bushes and trees, drift of such pesticides, and storm water drainage during construction will contribute to the pollution, erosion and loss of nearby soil. These same factors will also contribute to degrading this wetland and any others in the area. Wetlands are not as common in Driftless SW WI as they are in other parts of Wisconsin so they need to be protected. It is only with the decades of good conservation practices of local family farmers and the recent hard work of volunteers who spend hours removing woody invasives and pull Garlic mustard near to its wetland that has helped maintain a good working wetland. Wetlands act as a natural sponge and filter by removing pollutants from water, storing water temporarily and allowing it to percolate into the ground. Wetland plants and soils work around the clock to cleanse both surface and groundwater which helps to protect public health and native species. Some pollutants are held for years in the roots of native wetland plants. But too much pollution makes them unable to act as the needed sponge. It is estimated that almost half of Wisconsin's original 10 million acres of wetland type areas are gone by development and/or invasive species. Reed canary grass is an invasive species that dominates almost half a million acres of Wisconsin's wetlands. But no Reed Canary grass has been found in the Ridgeway Pine Relict State natural Area... yet. Instead we have American germander, winterberry holly, Joe-pye-weed, bog rosemary, Turtlehead, Blue lobelia, Palm Sedge, Sensitive fern, Bottlebrush sedge, fox sedge, marsh marigold, Skunk cabbage, etc and jewelweed. This is probably because it is protected on all sides by deep cliffs, called the gulch so roads, humans and mammals do not so easily carry invasives and pollutants. Invasive species are considered by many as the greatest threat to the long-term health and sustainability of Wisconsin's wetlands.

I would like to express my concern that the Final EIS severely downplays the permanent damage that will occur to some of the best cropland soils in the state of Wisconsin. This soil damage will affect farm incomes, profitability, and economic stability in the area for decades to come.

The past five years have seen record rainfalls all over the farmlands of Southwestern Wisconsin leaving very wet soils in area not ever considered "wetlands". Southwest Wisconsin farmers are not having difficulty harvesting crops this year, because they can't put their harvest equipment onto wet soils without permanently damaging the growing potential of the soil for years to come. The final EIS states in Chapter 3 that "wet soils are more easily damaged and more difficult to repair."

When one considers the current wet state of soils that have suffered under the past five years of heavy precipitation throughout Southwestern Wisconsin, I believe

that the final EIS severely underestimates the amount of productive ag land that will be permanently damaged and will become nonproductive, or greatly unproductive, cropland if this line is constructed. This will become a devastating economic loss for this region that in the long term, cannot be made up by easement payments.

This soil damage will result in lost cropland, lost land values at times of sale, and lost tax base for townships, counties, and the state. This will eventually trickle down to future generations of rural Wisconsin and create a rural utility wasteland where the backbone of our economy, our farms, are no longer viable to support our communities and our way of life.

Rural farms and people have long been supportive of providing land for electric infrastructure to power our nation, However, to be asked to make these huge sacrifices of our crop lands for a line that has not been proven to be needed, and has not had adequate exploration of potentially less expensive, and definitely more cropland friendly non-transmission alternatives, is a direct blow to our livelihoods, farms, and economies of our corner of the state.

I do not think that the final EIS has been adequately explored or addressed these crop land and economic concerns of rural Southwestern Wisconsin.

Linda Kelen





David Reinhart <comments@cardinalhickorycreekeis.us>

transmission line

1 message

maggie kraft [REDACTED]
To: comments@cardinalhickorycreekeis.us

Tue, Oct 29, 2019 at 8:12 AM

I am opposed to this line being installed



David Reinhart <comments@cardinalhickorycreekeis.us>

Final Environmental Impact Statement

1 message

Mary M. Kritz [REDACTED]

Mon, Nov 25, 2019 at 11:42 AM

To: "comments@CardinalHickoryCreekEIS.us" <comments@cardinalhickorycreekeis.us>

Attached is a five page letter that has comments from me and my husband on the FEIS. We also sent a letter by postal mail.

Mary M Kritz

 **RUScommentsFinalDraftNov2019.pdf**
268K

November 25, 2019

SWCA Environmental Consultants
Attn: Cardinal-Hickory Creek EIS
80 Emerson Lane, Suite 1306
Bridgeville, PA 15017-3472

Subject: Comments on the Rural Utilities Service (RUS) Final Environmental Impact Statement

The RUS final report is a much-improved document over the draft report that the RUS issued in early 2019. The report lays out the applicants' (ATC, ITC, Dairyland) proposed plans for building a 100-125 mile, high-voltage (345-kV) transmission line from Middleton, WI, to Dubuque, Iowa that is called the Cardinal-Hickory Creek line (CHC). The CHC will run through the National Wildlife and Fish Refuge (NWFR) which lies along the Mississippi River in Wisconsin and Iowa and across the River. The Report discusses ad nauseam the background, stages and process that the applicants went through to develop the proposal to build the line. The Report also has sections discussing why the applicants think there is a need for the line, the alternative routes considered, environmental consequences of building the CHC line, and construction methods that will be used to mitigate negative impacts.

Unfortunately, the four volume, 618-page report says almost nothing about the need for the line and the costs and benefits that the line will have for Wisconsin residents. In Section 1.4 (Vol. 1, p. 11) the Report lists six reasons why the applicants think the line is needed, namely to (a) increase reliability of the regional system/grid, (b) alleviate congestion in the regional grid, (c) expand access to the regional grid of additional generation capacity, (d) increase interstate transferability of energy, and (e) reduce power losses and increase transmission efficiency, and (f) enhance the national transmission system. Additional information in Section 1.4 makes it clear that regional and national concerns rather than State of Wisconsin interests have driven the CHC planning process. Planning for the CHC line started with the establishment by FERC (the Federal Energy Regulatory Commission) in 2005/2006 of RTOs (Regional Transmission Organizations) to promote efficiency and reliability in the national electric transmission grid. MISO (Midcontinent Independent System Operator) was set up as the Midwest RTO. Shortly after it was established in 2008, MISO launched a review of transmission needs in the Midwest and in 2011 it approved 17 projects (MVPs) in 13 member states that its members (largely transmission and utility companies) decided were needed. The CHC project is the last of the 17 projects to be built, which placed considerable pressure on the Wisconsin Public Service Commission (WPSC) to approve this project.

Several issues arise from the MISO planning process, which brings us to the concerns we have today. The first is that much has changed in the electricity generation field since MISO approved building the 17 projects. In the past 10 years, energy demand in WI has not risen at the pace MISO estimated that it would during its planning process (2008-2011) because technology changes have increased the energy efficiency of new appliances, automobiles,

machines, etc. Another change since 2010/2011 is renewable energy generated locally, which has become a more important factor in the energy field. Decreasing costs of installing renewable wind and solar has encouraged and will continue to encourage consumers to switch to locally or community-based energy-based systems. In addition, there are growing civic concerns about whether relying on energy generated miles away and transmitted via high voltage transmission lines is the appropriate direction to go given the unsettled issues regarding the impacts those lines have on the environment. Unfortunately, MISO has a rigid planning process that remains wedded to decisions taken in 2011 and that is not open to discussion with local residents, governments and organizations in WI who are opposed to the CHC line and who have raised legitimate issues and will have to see and bear the impacts the line will have on our environment daily because this is where we live.

The second problem that arises from the MISO planning process is the fact that of the 17 lines, only the Cardinal Hickory line runs through the Driftless region which has a totally different geology and topography than other parts of the Midwest that is not found elsewhere in the USA or world. The other 16 MISO projects all run across terrains that were flattened by the four glaciers that covered the Midwest at different historic points but not the Driftless which is only located in Southwest WI, NE Iowa, and SE Minnesota. In Sections 3.2 and 3.3 (Volume 3) the RUS Report discusses the unique geology, topography, physical features, soil, plants and wildlife in the Driftless region, stating:

“The surface geologic features of the analysis area, including the ridges and valleys present, are a result of millions of years of erosion and drainage to the Mississippi River. The analysis area is within the Driftless Area, which is distinguished by hilly uplands and plateaus deeply dissected by streams. The Driftless Area is also characterized by the lack of glacial drift deposits (often described as till), meaning the area was not covered by ice sheets in the last glacial period.”
(3.2.1.1., p. 140, Volume 3)

Although the RUS Report acknowledges the unique geology and topography of the Driftless Region and describes it in some detail in parts of Volume 3 and it is aware that the line will have a major impact on the visual quality and aesthetics of the Driftless Region, it keeps returning to the same mantra, namely that the public good that will be served by the CHC line outweighs any potential damage that might be done to the Driftless Region and posterity. The RUS makes its position clear in Volume 3, Chapter 4, where it states:

"Any projects that would result in modification of the landscape—such as transportation improvement projects, new energy development, new or rebuilt transmission lines, and urban development projects—would contribute to the cumulative adverse impacts to visual quality and aesthetics. These developments, when added to the direct effects of the proposed C-HC Project, would incrementally convert the scenic quality of the natural landscapes into a more developed and industrialized landscape that would adversely affect scenery, and sensitive viewers over time." (quoted from Vol 3, Chapter 4, Section 4.4.10)

The opponents of the CHC line disagree that the visual quality and aesthetics of the Driftless should be sacrificed in order to build the line. We do not now have and do not want to “convert the scenic quality of the natural landscape into a more developed and industrialized landscape

that would adversely affect scenery, and sensitive viewers over time.” The opposition to the CHC line does not just consist of a few NIMBYs who do not want the line. We attended most of the hearings at which WI residents had the opportunity to comment on the line and never heard a single person speak in favor of the line at any of those meetings. Nor does the Report indicate that there was local demand for the CHC, which it probably would have done if it existed. The Report (Section 1.7, Vol 1), describes the opportunities offered to the public to comment and addresses specific concerns people raised in comment letters (Vol. 4), Appendix F. The Report does, not, however, tabulate the number of comments submitted in support versus opposition to the CHC but we suspect that the vast majority of them were in opposition. My husband and I did submit comments to the RUS and our letters (Kritz and Gurak) are supposedly responded to in Appendix F. However, those responses consisted of “Comment noted” or “See Section ___ which discusses” that point or “Additional information” was added to the Report in Section ____.”

Also minimized in the RUS Report is the number of local governments and organizations that passed resolutions opposing the line or asking the WPSC to require applicants to address specific questions before it reached a decision. One request made by most of the local governments along the CHC route was that the Applicants needed to provide more information on the costs and benefits of the line. In Table 4.4 (Vol 4, p. F-12) the Report list 7 local governments that submitted comments. In reality, eight townships,¹ two counties (Iowa and Dane), four villages,² three school districts (Mount Horeb, Barneveld, Dodgeville), and 13 NGOs³ passed resolutions opposing the CHC. Eighteen townships passed resolutions asking ATC for further information that would justify the need for the CHC line and expressing concerns about the impact the line would have on the Driftless Region.⁴ In addition, all the WI state senators and assemblyman in Iowa and Grant counties wrote letters expressing concerns over the proposed CHC line. In the DEIS Public Comment Report (Vol. 4, Appendix F) there are NO responses to the comments made by the local governments (Table 4-4) or the NGOs (Table 4-5).

The Report undoubtedly ignored the comments submitted to the WPSC rather than directly to the RUS (DEIS) but in so doing, it ignores or minimizes the massive opposition and concerns that

¹ Wyoming, Dodgeville, Springdale, Belmont, Wingville, Brigham, Lima, and Arena.

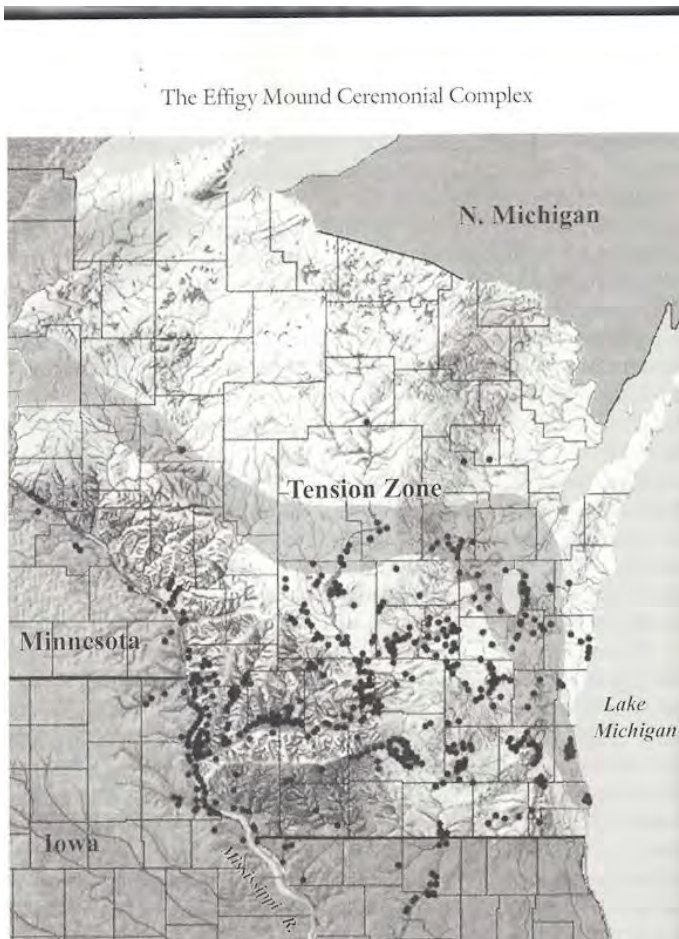
² Spring Green, Mt. Horeb, Montford, and Barneveld

³ Capital Region Advocacy Network for Environmental Sustainability, Friends of Gov. Dodge State Park, Friendship Center, Harry and Laura Nohr Trout Unlimited Chapter, Iowa County Recreation and Prairie Restoration, Madison Audubon Society, Sustain Iowa County, Driftless Area Land Conservancy, Save Our Unique Lands (SOUL), Friends of Blue Mounds State Park, Black Earth Creek Watershed Association, Folklore Village, and WI Wildlife Foundation.

⁴ Arena, Belmont, Brigham, Clyde, Crawford, Cross Plains, Dodgeville, Jackson, Juneau, La Crosse, Lima, Monroe, Montford, Springdale, Vernon, Vermont, Wingville, and Wyoming.

the CHC has generated in Southwest Wisconsin. The Report completely ignores the issues raised by WI county, village/city, township governments and civic organizations.

Section 3.9 (Vol 2, p.280+), which discusses cultural and archaeological issues raised by the CHC line illustrates further the dismissive tone and lack of response in the RUS report to legitimate issues. The Report states that there are 37 previously recorded archaeological sites or cemeteries within the area for potential physical impacts (p. 283), ten of which are prehistoric Indian mound sites. The report does not list where these Indian mound sites are located because disclosing their location could lead to their disturbance by the public, but it does state (page 289) that some of these mounds lie within the CHC impact area. Below is a map of Indian Mounds in Wisconsin which shows a high concentration of mounds on both sides of the Mississippi River and in the Upper Mississippi Wildlife Refuge. The map was scanned from the book *Indian Mounds of Wisconsin*, 2nd Edition, Madison: University of WI Press, co-authored by Robert Birmingham and Amy Rosebrough (p. 120). Birmingham used to be the Archaeologist for the State of WI but is now retired. Rosebrough currently works as the Archaeologist at the Wisconsin State Historical Society. Elsewhere in the book, page 220, the book describes mounds in the Cassville Bluffs area, Nelson Dewey State Park, and Wyalusing State Park.



Robert Watson, who did several of the archaeological surveys for the applicants, stated in a March 26, 2018 memo to Amy Lee, ATC, that:

“The review of WHPD (WI Historic Preservation Database) has determined that 24 previously recorded archaeological or cemetery/burial sites are included within the 150 ft wide APE (Area of Potential Effects) of the proposed route segments. Portions of both prehistoric and historic archaeological sites fall within the APE. Prehistoric sites include isolated finds, lithic scatters and workshops, habitation sites, and mound groups and earthworks. Historic sites include farmstead and habitation sites, mining related sites, cemeteries, and historic trash scatters. Portions of some of the previously recorded archaeological or cemetery/burial within the APE have been investigated to assess potential project effects. Archaeological survey of unsurveyed portions of all sites within the final project alignment, temporary workspaces, or access routes is recommended to more fully assess potential project effects.” (PSC REF#: 341912)

Unfortunately, the Report does not make it clear whether additional surveys of Cultural and Historic Resources will be carried out. On page 283 it states that “Additional cultural resources surveys may be required” but on page 289 it states that “A cultural resources survey of all proposed laydown yards in consultation with the Iowa and/or Wisconsin SHPOs (State Historic Preservation Office) would be required” (Vol. 2, Section 3.9). The RUS does seem aware that there may be cultural and historic resources in the APE. On page 314 the Report states that:

“In addition, as a comprehensive cultural resources survey has not been conducted, any number of unknown resources may be present within the area analyzed for potential physical impacts. Prior to construction, RUS would attempt to identify and evaluate additional resources within the area analyzed for potential physical impacts. If, through consultation with the Iowa and/or Wisconsin SHPOs, RUS, the Utilities, and affected tribal groups, measures cannot be taken to avoid impacts to the characteristics that qualify any identified resource for inclusion in the NRHP, that may constitute a major impact.” (3.9.2.9.2)

Before giving its approval and funding to the CHC project, the RUS should require that the applicants carry out a survey of cultural and historic resources in the APE. We are concerned that construction of the line may start and then uncover cultural and historic resources. On pages 289-290, mound sites are mentioned that may be eligible for the NRHP (National Registry of Historic Places) according to Stanley and Stanley 1988, *Prehistoric Mounds of the Quad State Region of the Upper Mississippi Valley*. These sites should be evaluated prior to construction.

To sum up, we do not feel that the Final Environmental Impact Statement makes a solid case that the CHC is needed nor that it will benefit residents of the State of Wisconsin, Perhaps that was not its goal but the feeble effort it made in Section 1.4 suggests that it did think that it needed to identify the “Project Purpose and Need” (Volume 1, pp 11-19). Instead the Report reads like a document that was written to justify going ahead with decisions already made by MISO in 2011 and the WPSC (September 2019). Many sections of the Report read as if the authors were fully aware of the negative impacts the CHC would have on the Driftless Region. But the Report’s bottom line is always, “any negative impacts to the environment will be mitigated in the long run.” We do not accept that conclusion and believe the Federal Government should draw the conclusion that the CHC will have major and long-term impacts on the Driftless Region if construction goes ahead.

Sincerely yours,

Mary M. Kritz and Douglas T. Gurak

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████████████████████

RECEIVED
DEC 03 2019

November 25, 2019

SWCA Environmental Consultants
Attn: Cardinal-Hickory Creek EIS
80 Emerson Lane, Suite 1306
Bridgeville, PA 15017-3472

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Although the RUS Report acknowledges the unique geology and topography of the Driftless Region and describes it in some detail in parts of Volume 3 and it is aware that the line will have a major impact on the visual quality and aesthetics of the Driftless Region, it keeps returning to the same mantra, namely that the public good that will be served by the CHC line outweighs any potential damage that might be done to the Driftless Region and posterity. The RUS makes its position clear in Volume 3, Chapter 4, where it states:

“Any projects that would result in modification of the landscape—such as transportation improvement projects, new energy development, new or rebuilt transmission lines, and urban development projects—would contribute to the cumulative adverse impacts to visual quality and aesthetics. These developments, when added to the direct effects of the proposed C-HC Project, would incrementally convert the scenic quality of the natural landscapes into a more developed and industrialized landscape that would adversely affect scenery, and sensitive viewers over time.” (quoted from Vol 3, Chapter 4, Section 4.4.10)

The opponents of the CHC line disagree that the visual quality and aesthetics of the Driftless should be sacrificed in order to build the line. We do not now have and do not want to “convert the scenic quality of the natural landscape into a more developed and industrialized landscape

that would adversely affect scenery, and sensitive viewers over time.” The opposition to the CHC line does not just consist of a few NIMBYs who do not want the line. We attended most of the hearings at which WI residents had the opportunity to comment on the line and never heard a single person speak in favor of the line at any of those meetings. Nor does the Report indicate that there was local demand for the CHC, which it probably would have done if it existed. The Report (Section 1.7, Vol 1), describes the opportunities offered to the public to comment and addresses specific concerns people raised in comment letters (Vol. 4), Appendix F. The Report does, not, however, tabulate the number of comments submitted in support versus opposition to the CHC but we suspect that the vast majority of them were in opposition. My husband and I did submit comments to the RUS and our letters (Kritz and Gurak) are supposedly responded to in Appendix F. However, those responses consisted of “Comment noted” or “See Section ___ which discusses” that point or “Additional information” was added to the Report in Section ____.”

Also minimized in the RUS Report is the number of local governments and organizations that passed resolutions opposing the line or asking the WPSC to require applicants to address specific questions before it reached a decision. One request made by most of the local governments along the CHC route was that the Applicants needed to provide more information on the costs and benefits of the line. In Table 4.4 (Vol 4, p. F-12) the Report list 7 local governments that submitted comments. In reality, eight townships,¹ two counties (Iowa and Dane), four villages,² three school districts (Mount Horeb, Barneveld, Dodgeville), and 13 NGOs³ passed resolutions opposing the CHC. Eighteen townships passed resolutions asking ATC for further information that would justify the need for the CHC line and expressing concerns about the impact the line would have on the Driftless Region.⁴ In addition, all the WI state senators and assemblyman in Iowa and Grant counties wrote letters expressing concerns over the proposed CHC line. In the DEIS Public Comment Report (Vol. 4, Appendix F) there are NO responses to the comments made by the local governments (Table 4-4) or the NGOs (Table 4-5).

The Report undoubtedly ignored the comments submitted to the WPSC rather than directly to the RUS (DEIS) but in so doing, it ignores or minimizes the massive opposition and concerns that

¹ Wyoming, Dodgeville, Springdale, Belmont, Wingville, Brigham, Lima, and Arena.

² Spring Green, Mt. Horeb, Montford, and Barneveld

³ Capital Region Advocacy Network for Environmental Sustainability, Friends of Gov. Dodge State Park, Friendship Center, Harry and Laura Nohr Trout Unlimited Chapter, Iowa County Recreation and Prairie Restoration, Madison Audubon Society, Sustain Iowa County, Driftless Area Land Conservancy, Save Our Unique Lands (SOUL), Friends of Blue Mounds State Park, Black Earth Creek Watershed Association, Folklore Village, and WI Wildlife Foundation.

⁴ Arena, Belmont, Brigham, Clyde, Crawford, Cross Plains, Dodgeville, Jackson, Juneau, La Crosse, Lima, Monroe, Montford, Springdale, Vernon, Vermont, Wingville, and Wyoming.

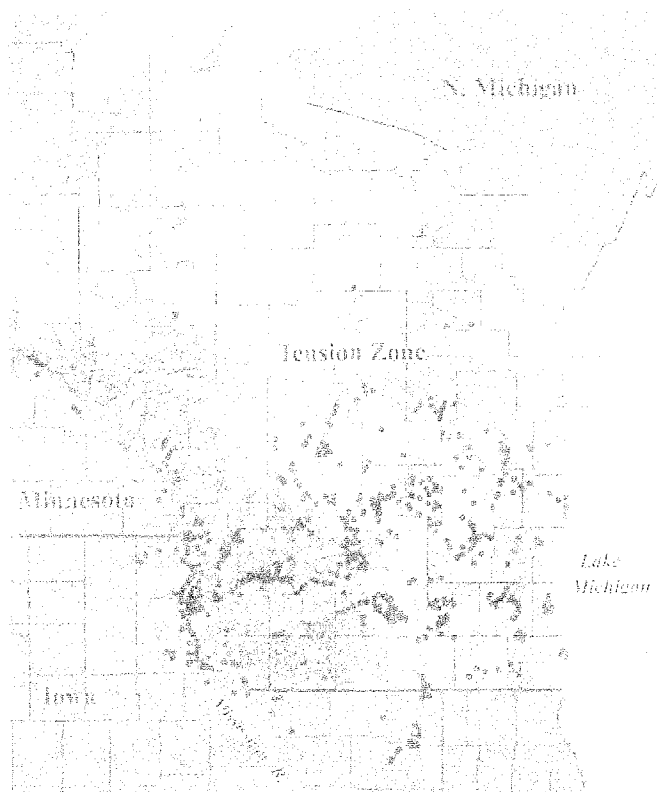
Richland, Sauk, Iowa, and Dane.

the CHC has generated in Southwest Wisconsin. The Report completely ignores the issues raised by WI county, village/city, township governments and civic organizations.

Section 3.9 (Vol 2, p.280+), which discusses cultural and archaeological issues raised by the CHC line illustrates further the dismissive tone and lack of response in the RUS report to legitimate issues. The Report states that there are 37 previously recorded archaeological sites or cemeteries within the area for potential physical impacts (p. 283), ten of which are prehistoric Indian mound sites. The report does not list where these Indian mound sites are located because disclosing their location could lead to their disturbance by the public, but it does state (page 289) that some of these mounds lie within the CHC impact area. Below is a map of Indian Mounds in Wisconsin which shows a high concentration of mounds on both sides of the Mississippi River and in the Upper Mississippi Wildlife Refuge. The map was scanned from the book *Indian Mounds of Wisconsin*, 2nd Edition, Madison: University of WI Press, co-authored by Robert Birmingham and Amy Rosebrough (p. 120). Birmingham used to be the Archaeologist for the State of WI but is now retired. Rosebrough currently works as the Archaeologist at the Wisconsin State Historical Society. Elsewhere in the book, page 220, the book describes mounds in the Cassville Bluffs area, Nelson Dewey State Park, and Wyalusing State Park.



Figure 13. Indian Mound Concentration in Wisconsin



Robert Watson, who did several of the archaeological surveys for the applicants, stated in a March 26, 2018 memo to Amy Lee, ATC, that:

"The review of WHPD (WI Historic Preservation Database) has determined that 24 previously recorded archaeological or cemetery/burial sites are included within the 150 ft wide APE (Area of Potential Effects) of the proposed route segments. Portions of both prehistoric and historic archaeological sites fall within the APE. Prehistoric sites include isolated finds, lithic scatters and workshops, habitation sites, and mound groups and earthworks. Historic sites include farmstead and habitation sites, mining related sites, cemeteries, and historic trash scatters. Portions of some of the previously recorded archaeological or cemetery/burial within the APE have been investigated to assess potential project effects. Archaeological survey of unsurveyed portions of all sites within the final project alignment, temporary workspaces, or access routes is recommended to more fully assess potential project effects." (PSC REF#: 341912)


Unfortunately, the Report does not make it clear whether additional surveys of Cultural and Historic Resources will be carried out. On page 283 it states that "Additional cultural resources surveys may be required" but on page 289 it states that "A cultural resources survey of all proposed laydown yards in consultation with the Iowa and/or Wisconsin SHPOs (State Historic Preservation Office) would be required" (Vol. 2, Section 3.9). The RUS does seem aware that there may be cultural and historic resources in the APE. On page 314 the Report states that:

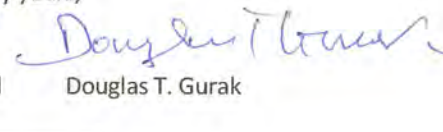
"In addition, as a comprehensive cultural resources survey has not been conducted, any number of unknown resources may be present within the area analyzed for potential physical impacts. Prior to construction, RUS would attempt to identify and evaluate additional resources within the area analyzed for potential physical impacts. If, through consultation with the Iowa and/or Wisconsin SHPOs, RUS, the Utilities, and affected tribal groups, measures cannot be taken to avoid impacts to the characteristics that qualify any identified resource for inclusion in the NRHP, that may constitute a major impact." (3.9.2.9.2)

Before giving its approval and funding to the CHC project, the RUS should require that the applicants carry out a survey of cultural and historic resources in the APE. We are concerned that construction of the line may start and then uncover cultural and historic resources. On pages 289-290, mound sites are mentioned that may be eligible for the NRHP (National Registry of Historic Places) according to Stanley and Stanley 1988, *Prehistoric Mounds of the Quad State Region of the Upper Mississippi Valley*. These sites should be evaluated prior to construction.

To sum up, we do not feel that the Final Environmental Impact Statement makes a solid case that the CHC is needed nor that it will benefit residents of the State of Wisconsin, Perhaps that was not its goal but the feeble effort it made in Section 1.4 suggests that it did think that it needed to identify the "Project Purpose and Need" (Volume 1, pp 11-19). Instead the Report reads like a document that was written to justify going ahead with decisions already made by MISO in 2011 and the WPSC (September 2019). Many sections of the Report read as if the authors were fully aware of the negative impacts the CHC would have on the Driftless Region. But the Report's bottom line is always, "any negative impacts to the environment will be mitigated in the long run." We do not accept that conclusion and believe the Federal Government should draw the conclusion that the CHC will have major and long-term impacts on the Driftless Region if construction goes ahead.

Sincerely yours,


Mary M. Kritz


Douglas T. Gurak

MILWAUKEE WI 530

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November 25, 2019

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Subject: Comments on the Rural Utilities Service (RUS) Final Environmental Impact Statement

The Final Report contains many more pages than the draft report. But, these additional pages still do not analyze or prove that Cardinal Hickory Creek is critical to meet any current or foreseeable energy needs in the state of Wisconsin. During the Wisconsin PSC Hearings, the PSC staff determined there was an alternative to CHC that would achieve Wisconsin's energy efficiency goals. Known as BWARA (Base With Asset Renewal Alternative), this alternative would rebuild existing lines at a fraction of the cost (around \$900,0000) of CHC (half a billion + or -), which would then free-up the \$67 million or so that MISO wants Wisconsin to commit to paying for steel-in-the-ground for investment in local renewable energy.

The RUS Final Environmental Impact Statement does not acknowledge the rapidly changing landscape of energy. It does not acknowledge that investment should be about CO2 reduction, and that 50% of our CO2 reduction since 2005 has come from energy efficiency, net metering and roof-top solar, according to statistical information prepared by the federal government.

The Final Report continues to simply contain words like "minimize" and "mitigate". Iowa has been minimizing and mitigating the impacts of Confined Animal Feeding Operations (CAFO's) for some years now, with less than satisfactory results.

What do you say to an entire body of people whose minds have already been made up? Whose report is a compilation of rhetoric that appears to come directly from MISO, rather than an independent and thoughtful consideration of rapidly changing energy technologies, climate, demographics and need.

We as a world are running out of time to "make things right". Building a 120-mile fence across and through communities, unique habitats and irreplaceable topography is wrong-minded thinking driven by an organization that does not care one iota about Wisconsin, its people or its wildlife and ecological systems.

On June 15, 2015, the City of Dubuque, Iowa passed Resolution 215-15 denying ITC's request for permitting for Cardinal Hickory Creek through the City, stating in part that CHC... "would not be in the public interest". Since then, countless individuals, organizations, towns, municipalities and elected officials have been diligently analyzing and weighing the benefits vs the costs of CHC. Their Resolutions, comments, briefs, and letters have become a part of the Public Service Commission's Docket. The Attorney Generals of the State of Illinois and the State of Michigan

filed Amicus Briefs with the Wisconsin PSC stating their concerns, a copy of which is attached with this e-mail. So too have Wisconsin State Representatives and Senators.

The RUS Final Environmental Impact Statement gives its blessing to Cardinal Hickory Creek because its statements say that we don't count. That wildlife habitat does not count. That MISO's wish lists trump actual need. It does this by insisting that all the damage done will be "mitigated" and "minimized". By insisting that change will come to the Driftless Area, so just shut up and accept what big energy wants to dish out. What the RUS fails to anticipate is what shape that change will take.

Dozens of organizations, like Grant County Rural Stewardship, Driftless Area Land Conservancy, IMPEC, Wisconsin Wildlife Federation, the Farmers Union and others envision a land where views, vistas, agricultural lands, fragile ecosystems and recreational areas coexist. What MISO envisions is a people held in thrall to big energy payouts and huge energy debt.

The RUS Final Impact Statement does not address all the different ways CHC will injure those who make their living from farming. The Final Impact Statement does not begin to address the effects of transmission on avian fertility and wildlife. The RUS Final Impact Statement does not note that animals see transmission as light. That a 120-mile fence of light across a critical bird migration route will have long-term consequences.

At what point in this report are the needs and wants of the people of Wisconsin ever really considered? At what point has a careful analysis been done to answer the questions asked in Resolutions passed by counties and municipalities throughout southwest Wisconsin. The answer is NONE.

In truth, careful scrutiny shows an out-dated merchant line indifferent to any environmental impacts on people or place. We, the rural people of the midwest, should not have to spend our hard-earned money on archaic transmission systems and methodologies. Our RUS should not be lending money that will come from our pockets to build such a dinosaur either.

Sincerely,

Dena Kurt



**BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

Joint Application of American Transmission)
Company, ITC Midwest LLC, and Dairyland)
Power Cooperative, for Authority to Construct) 5-CE-146
And Operate a New 345 kV Transmission Line)
From the Existing Hickory Creek Substation in)
Dubuque County, Iowa, to the Existing Cardinal)
Substation in Dane County, Wisconsin, to be)
Known as the Cardinal-Hickory Creek Project.)

**AMICUS BRIEF
ON BEHALF OF THE PEOPLE OF THE STATE OF ILLINOIS BY ILLINOIS
ATTORNEY GENERAL KWAME RAOUL AND THE PEOPLE OF THE STATE OF
MICHIGAN BY MICHIGAN ATTORNEY GENERAL DANA NESSEL**

The People of the State of Illinois, by Attorney General Kwame Raoul and the People of the State of Michigan by Attorney General Dana Nessel submit this Amicus Brief in opposition to the Joint Application of American Transmission Company, ITC Midwest LLC, and Dairyland Power Cooperative for authority to build a new 345 kV transmission line, known as the Cardinal-Hickory Creek Project. Pursuant to PSC 2.20(3), we request that the Public Service Commission (“PSC” or “Commission”) allow this Brief as a friend of the Commission.

The substantial costs resulting from the construction of this line will be allocated to consumers throughout the Midwest, including to both Illinois and Michigan electricity customers. Illinois consumers are expected to be allocated about 10% of the costs, and Michigan consumers 21%, resulting in our residents paying tens of millions of dollars for this project.¹ Our state consumers will be affected by the Commission’s action in this proceeding.

¹ These allocations are based on the Illinois and Michigan load of the MISO north region. See, e.g., Ex.-Applicants-Dagenais-1 a 86; MISO 2019/2020 Planning Resource Auction (PRA) Results, available at: https://cdn.misoenergy.org/20190412_PRA_Results_Posting336165.pdf

While the Mid-Continent Independent System Operator (MISO) approved this project in 2011 as part of its Multi-Value Project portfolio, in the years since 2011, circumstances have changed considerably, requiring additional analysis to avoid an expenditure of hundreds of millions of dollars for a line that may not be needed. Among the changes that necessitate a full, current review of the project are:

1. Load growth has slowed down considerably since 2011, with load shrinking or remaining constant year-over-year. As a result, the growth in demand and for capacity that the line anticipated have not occurred.

2. Distributed generation, such as local solar generation, reduces the demand on long distance transmission lines. Existing and proposed solar projects in Wisconsin will affect the need for additional transmission capacity, and should be considered as part of the analysis of the need for and the costs of the line.

3. Technical developments in battery storage, especially when combined with expanded wind and solar renewable capacity, can be expected to reduce the need for additional transmission capacity, and should be considered as part of the analysis of the need for and the costs of the line.

4. The growth of renewable energy capacity in Wisconsin as well as in Illinois and Michigan since 2011 should be considered in assessing whether the transmission line is needed to meet Midwest renewable energy goals. The extent to which the line is needed to import wind energy from other states must be balanced against the fact that the proposed line is an “open access” line that any type of generation can use, not just wind. The line is not limited to renewable power.

The lack of recent peak load growth, associated with the expansion of distributed solar, wind and battery technologies, creates a very different situation from that analyzed in 2011 when the line was originally proposed. It is necessary to consider recent alternatives to determine whether the transmission line is needed.

The Applicants discuss several possible “futures” which show varying amounts of net benefits. However, Wisconsin PSC Staff witness Vedvik questioned the Applicants’ assessment of costs and benefits, concluding that the line results in a net economic loss in the most likely future scenarios. (Direct-PSC-Vedvik-38.) In light of the substantial costs associated with the project both for Wisconsin and for Illinois and Michigan consumers, it is necessary to step back and recognize that circumstances have changed enough since 2011 to require the Applicants to provide updated transmission alternatives before receiving approval to construct the line.

For the foregoing reasons, the People of the States of Illinois and Michigan, through Attorneys General Kwame Raoul and Dana Nessel, respectively, request that the PSC accept this amicus brief pursuant to PSC 2.20(3) and reject the pending request for approval of the Cardinal-Hickory Creek transmission line. The PSC may provide the applicants, at its option, the opportunity to consider ways that solar generation, battery storage, and deployment of other advanced transmission technologies, can economically and efficiently address the current needs

for transmission in the Midwest, in light of both the flat load and the changes in technology over the past several years.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS

By Kwame Raoul, Attorney General

_____/s/_____
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FWS

70, SWCA CONTRACTOR
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Dear Sir or Madam,

I am completely against ~~the grid by itself~~, and of any wires going through, or over a Sanctuary of any kind. Because of those higher voltages, and radiation involved, that's the practical reason, and good enough to stop that Hillyer creek line by itself.

The main reason for my opposition however, lies in an invention of mine. A free energy machine, that generates pure electricity, and doesn't create any type of pollution. Some thing I came up with, back in 1996, but Bill Clinton wouldn't allow it to be patented, and has been trying to ruin me ever since. To the detriment of this country, its citizens and the wild life, along with the environment, and I do believe that grid, with solar panelling is because of all these weather aberrations. otherwise known as climate change, and could all be stopped through the use of my machine. That doesn't need power lines, and could free our rural areas of them forever, through a small generator, affordable to anyone - renters, or home owners, and one that freed us from pollution. Not what Bill Clinton was looking for, back in 96, and when I sent it to Bob Dole for a political issue. Clinton wouldn't even allow him to find out about it, and has been stealing Dole's mail ever since. Without regard for the environment, and my great hope is that you'll step into things. After this country has been on the down slide for the last 23 years, and you could be the ones who saved it. From Bill Clinton, and all the evil he's wrought for this country.

Sincerely,

Mark R. Kelly

Hunt R. Kyles

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