



David Reinhart &lt;comments@cardinalhickorycreekeis.us&gt;

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**Cardinal-Hickory Creek EIS**

1 message

**Sue Laufenberg** [REDACTED]

Tue, Oct 29, 2019 at 10:36 AM

To: comments@cardinalhickorycreekeis.us

Cc: dennis.rankin@usda.gov, barbara.britton@usda.gov

Dear SCWA Environmental Consultants,

I have a couple of comments in regard to your Final Environmental Impact Statement issued October, 2019.

First of all, thank you for your time and extensive research in regard to the impact the Cardinal-Hickory Creek project will have on the residents of Wisconsin.

My husband and I will be directly impacted by the Alternatives 4, 5 and 6 routes for the project, both aesthetically and financially. We live adjacent to Segments T and U of the routes.

I was shocked by Table 3.11-2 of the Impact Statement. I am curious as to whether our residence at 3320 Sugar Valley Rd, Mount Horeb is included in the 53 residences outside the ROW but within the Analysis Area. We are but a football field away from a large corner post planned for segment U in Alternative 5, I would think that if we are not in the private residence count, the Analysis Area is much too narrow. The corner post will be directly in front of our main entrance door and windows. I am certain the financial impact of this corner post will be far greater than the 20% decrease in property value referred to in the study.

I believe there must be hundreds of other residences along the proposed routes barely beyond the 300 foot Analysis Area that would be very adversely impacted. I feel that using a mere 300 foot Analysis Area does not provide realistic data.

Also, since the transmission line runs along some ridges, as in Segments T and S, there will be hundreds of residences greatly affected aesthetically by routes 4, 5 and 6. Furthermore, the routes will take a horseshoe path around the Village of Mount Horeb, in direct view of most of the residences of that village.

Also, in regard to Segment U: the corner post referred to above is extremely close to the Sugar River Tributary with a downward slope to the river. I believe this would make a huge negative impact on the Sugar River, both in the Segment U area and all the way downstream. This in itself would deter Alternative 5 from being the Environmentally Preferable Alternative.

Another concern I have with the EIS, is in Volume 4. Specifically, the projected increase in energy needs. Table A-1, Electrical usage for 1999-2014 shows that there is a very small percentage increase in energy usage from years 2010-2014. I believe this would be more indicative of projected future needs rather than using outdated data from 20 years ago. The residents of Wisconsin have been on board in recent years with conserving energy and using alternative energy sources and storage. Therefore, I believe the use of more recent data in calculating future usage is much more accurate.

I hope and pray that our comments on the EIS are taken very seriously on the decision to recommend that federal funds be used to finance this extremely detrimental project.

Sincerely,

Susan Laufenberg  
[REDACTED]

10/31/2019

SWCA Mail - Cardinal-Hickory Creek EIS





David Reinhart &lt;comments@cardinalhickorycreekeis.us&gt;

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**Comments to the Final Federal EIS re: Cardinal Hickory Creek**

1 message

**CAROL LIND** [REDACTED]

Sat, Nov 23, 2019 at 2:59 PM

Reply-To: CAROL LIND [REDACTED]

To: comments@cardinalhickorycreekeis.us

I previously submitted comments to the Draft Federal EIS. As indicated in the final EIS, two of those comments were "noted", but they were not adequately addressed, if at all. In particular, I commented that the EIS is flawed because it fails to consider the alternatives to the construction of the transmission line in combination. The document insists that each alternative taken on its own meet the purported needs. This is ridiculous and not a solution that anyone would propose. Rather, a combination of alternatives would be used to satisfy any needs that have merit. Once the document set the alternatives up for failure it then avoided the required detailed analysis of alternatives. Failure to consider the alternatives in combination and to include this type of analysis makes the Final EIS wholly inadequate.

In addition, the document makes no real attempt to measure the purported need for the line. Is it a "nice to have" or a dire need? This is the last of many projects modeled by MISO a decade ago. Technology and times have changed. Demand is flat. Without having some measure of the need it is impossible to compare it with the economic and environmental cost of the line. As a result, the document does little to enable an informed decision regarding the issuance of a loan or permits in connection with the destructive project.

Carol Lind  
[REDACTED]



David Reinhart &lt;comments@cardinalhickorycreekeis.us&gt;

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**Stop the CHC project**

1 message

**Ron & Jean Luecke** [REDACTED]

Fri, Nov 1, 2019 at 1:32 AM

To: comments@cardinalhickorycreekeis.us

Cc: [REDACTED]

It is outrageous that our Federal agencies will allow a private company to take public and private lands to build unnecessary monstrous towers which will desecrate the beauty of our land and desecrate the wildlife areas and migratory flyways! Will Big Money always buy the Federal agencies against the public interest?

Jean Luecke  
[REDACTED]



David Reinhart <comments@cardinalhickorycreekeis.us>

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**Re: Stop the CHC project**

1 message

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**Ron & Jean Luecke** [REDACTED]

Tue, Nov 5, 2019 at 8:08 AM

To: comments@cardinalhickorycreekeis.us, dennis.rankin@usda.gov

On Fri, Nov 1, 2019, 2:32 AM Ron & Jean Luecke [REDACTED] wrote:

It is outrageous that our Federal agencies will allow a private company to take public and private lands to build unnecessary monstrous towers which will desecrate the beauty of our land and desecrate the wildlife areas and migratory flyways! Will Big Money always buy the Federal agencies against the public interest?

Jean Luecke  
[REDACTED]



David Reinhart <comments@cardinalhickorycreekeis.us>

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## Stop the Cardinal Hickory Creek project

1 message

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**Ron & Jean Luecke** [REDACTED]

Tue, Nov 5, 2019 at 11:41 AM

To: comments@cardinalhickorycreekeis.us, dennis.rankin@usda.gov

Cc: [REDACTED]

It is outrageous that our Federal agencies will allow a private company to take public and private lands to build unnecessary monstrous towers which will desecrate the beauty of our land and desecrate the wildlife sanctuaries and the migratory pathways and flyways!

Will Big Money always be able to buy the Federal agencies against the public interest?

Jean Luecke  
[REDACTED]



David Reinhart &lt;comments@cardinalhickorycreekeis.us&gt;

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**Environ. Negative impact of CHC Towers**

1 message

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**Ron & Jean Luecke** [REDACTED]  
To: comments@cardinalhickorycreekeis.us  
Cc: jean luecke [REDACTED]

Thu, Nov 21, 2019 at 12:02 AM

600 pages of mumbo-jumbo! If you are interested in the environment, it us simple. The high voltage wires harm the environment in many ways. I'll site two ways here. If the stray voltage kills one bird, it is horrid! However, 20,000 birds are expected to die each year----IF the125 miles of towers are erected. Stray voltage also harms humans. If one child gets leukemia from the voltage leakage, it is horrid! However, multiple cases of leukemia have been documented where other towers exist. This CHC project must be stopped!

Jean Luecke  
[REDACTED]



David Reinhart &lt;comments@cardinalhickorycreekeis.us&gt;

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## Health risks from high voltage

1 message

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**Ron & Jean Luecke** [REDACTED]

Sun, Nov 24, 2019 at 9:21 PM

To: comments@cardinalhickorycreekeis.us

Cc: [REDACTED] "Rankin, Dennis - RD, Washington, DC" &lt;dennis.rankin@usda.gov&gt;

Why do you think that we have Wildlife Preservation areas, public parks, forests, and green spaces? We want and need a beautiful world where all of our plant and animal species can be free to live and thrive. This is true for the Human animal as well. We need peace and serenity in our lives as much as possible for our MENTAL HEALTH.

I choose to live in a peaceful rural community. I choose NOT to live in an industrial area where wires and towers and concrete dominate the landscape.

AESTHETICS DOES MATTER!!!

The 100 to 125 mile pathway of the proposed towers will not be pretty.

The trouble is---IF these towers are built, more will follow, as in all of the high voltage wire tower corridors---causing more stray voltage hazards and more mental health risks.

Imagine a corridor of towers crossing the Driftless Area of Wisconsin and steaming across the Mississippi River invading the Wildlife Preserve. We have to stop these electric transmission MONSTERS before it is too late.

Be aware that the PSC staff, after reviewing all of the comment entries, advised the PSC commissioners to see the benefits of upgrading current lines at much lower costs. But the commissioners ignored their staffs findings and voted with the Big Money. They don't live here. They DO NOT understand. They made the wrong decision, not considering the health risks for the residents of this area.

Jean Luecke

[REDACTED]





David Reinhart &lt;comments@cardinalhickorycreekeis.us&gt;

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**EIS ---- Environmental problems**

1 message

**Ron & Jean Luecke** [REDACTED]

Mon, Nov 25, 2019 at 5:13 PM

To: comments@cardinalhickorycreekeis.us

Cc: jean luecke [REDACTED], "Rankin, Dennis - RD, Washington, DC" &lt;dennis.rankin@usda.gov&gt;

The ATC lines are NOT WARRANTED!

Wisconsin DOES NOT NEED this transmission. Our electric usage is flat and we will not benefit from the high voltage lines. Let's face it--the function of the ATC lines is to pass through Wisconsin, through our treasured Driftless Land, FOR USAGE BEYOND WISCONSIN! IF erected, ATC will take away our rights as citizens of Wisconsin and the very precious Driftless Area. We must stop BIG BUSINESS from taking away our rights, especially the rights of the property owners whose land will be confiscated by ATC and the rights of businesses involved in tourism and downtown shops and restaurants. The Driftless Area and the Upper Mississippi River National Wildlife and Fish Refuge should not be marred by monstrous towers.

Don't most people want to escape the cities for a serene country drive, viewing natural scenic areas? The Hwy 18/151 has been that scenic drive with few telephone and electric poles cluttering the landscape. Most of the lines have been buried along this drive. The high voltage lines and towers will ruin that space for 45+ miles, then on through Montfort, Lancaster, Cassville, and the Mississippi River crossing.

The other 16 MISO projects connecting high voltage lines run across glaciated, flattened areas. The CHC project is the only line affecting such an area as the special unglaciated Driftless Area, the only one of its kind in the world.

NO NEED to spoil this unique environment!

Jean Luecke  
[REDACTED]



David Reinhart <comments@cardinalhickorycreekeis.us>

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## Stop high voltage power lines across Mississippi River and the whole Driftless Area

1 message

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**Ronald Luecke** [REDACTED]  
To: comments@cardinalhickorycreekeis.us  
Cc: [REDACTED]

Sun, Nov 24, 2019 at 4:02 PM

Once again big business is trying to take away the rights of the average person by going through a federal Refuge that was promised for the citizens of this country not to be disturbed and they feel that they have the right to do what they want to do. Step up and stop them!



David Reinhart &lt;comments@cardinalhickorycreekeis.us&gt;

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**Public Comment**

1 message

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**Trisha McConnell** [REDACTED]  
To: comments@cardinalhickorycreekeis.us

Thu, Oct 31, 2019 at 12:17 PM

Please find my comment attached, and in text below:

Patricia B. McConnell, PhD, CAAB Emeritus  
Certified Applied Animal Behaviorist  
Emeritus, Department of Integrative Biology  
University of Wisconsin - Madison



As a landowner and hobby farmer southwest of Black Earth, WI, I am strongly opposed to this proposed project. I am also a PhD zoologist with knowledge of psychology, animal behavior and wildlife ecology. Based on all available information, this C-HC project is unnecessary, an economic boondoggle, and worst of all, an environmental disaster, all at the expense of the citizens and ecological health of our state.

Although the lines would not be built directly on our land, they would have a profound, and negative effect on my and my husband's life, as well as on the lives of hundreds of thousands of others who live here or travel from other areas. Like so many, we walk, hike and watch wildlife year round in many of the areas that would be affected by the construction of high-power transmission lines.

However, my primary concern is for the environmental health of the unique lands of the Driftless area, lands that include priceless habitat for several endangered, threatened and rare species. Listed below are the primary reasons that this project should be denied by the PSC, focused primarily on the environmental damage that this expensive and unnecessary project would inevitably cause.

#### NEGATIVE EFFECTS ON THREATENED SPECIES OF BIRDS IN THE MISSISSIPPI FLYWAY

Many threatened and at risk bird species rely on the Upper Mississippi River National Wildlife and Fish Refuge near Cassville, Wisconsin. If high power lines are built to cross the 1.6 mi. span of the river and surrounding areas, there is little doubt that many will be injured or killed. It is estimated that 40% of all North American migrating waterfowl and shorebirds use this route every year.

A study in 2014 (Loss et. al.) found that "between 12 and 64 million birds are killed each year at U.S. power lines, with between 8 and 57 million birds killed by collision and between 0.9 and 11.6 million birds killed by electrocution". Indeed, according to the power industry itself, "birds are a major problem for utilities," because of the frequency with

which power lines cause avian collisions. *T & D World*, the trade magazine for electric power-delivery systems, lists eagles, red-tailed hawks, great-horned owls, all juvenile raptors, herons, cranes, swans and pelicans as especially vulnerable to electrocution.

Thus, the populations of many of the species that use this route are in danger. For example, Audubon states it is “currently focusing intensive conservation efforts on twenty-seven bird species along the Mississippi Flyway”, including a variety of shore birds, warblers, sparrows, bobolinks and the Eastern meadowlark. Building power lines in this highly sensitive area creates an environmental crisis for these species that simply cannot be ignored.

#### NEGATIVE EFFECTS ON BIRD SPECIES FROM COLLISIONS WITH HIGH POWER TRANSMISSION LINES IN THE DRIFTLESS AREA

Along with birds who use the Mississippi Flyway, the construction of 345 kilovolt transmission lines running 100-125 miles from the Mississippi River to Middleton puts thousands, if not tens of thousands, of birds at risk. Not only would migrating birds be killed or badly injured by power lines in the flyway, but so would members of species that feed and nest in the area. Based on all available evidence, it is undeniable that vast numbers of birds will be killed if these power lines are constructed.

#### NEGATIVE EFFECTS DUE TO THE DISRUPTION OF THE ECOLOGY OF THE AREA

The area impacted by the C-HC plan has been carefully studied by several entities with expertise in wildlife conservation, including the WI DNR, which updated its Wisconsin Wildlife Action Plan in 2015. We know from that work, and the work of wildlife organizations like the Wisconsin Bird Conservation Initiative, that there are many threatened or endangered birds that are dependent on undisturbed land in SW Wisconsin, land that would be degraded or disturbed by the C-HC. For example,

Bald Eagles have been found to nest in abundance along the route of the proposed C-HC, according to the Wisconsin Breeding Birds Atlas. Endangered Loggerhead Shrikes, as well as threatened species like hooded and cerulean warblers, Henslow’s sparrows and Acadian flycatchers breed in the area that would be profoundly disrupted by the C-HC. Many other species “of concern” who nest along the proposed route would be negatively impacted, including whip-poorwills, nighthawks, red-headed woodpeckers, bobolinks and dickcissels.

#### NEGATIVE EFFECTS OF FOREST FRAGMENTATION AND THE EDGE EFFECT

Fragmented forests not only favor edge species rather than those who need undisturbed and continuous forest cover, they also increase weather extremes and increase songbird mortality. According to Murcia (1995) and Laurence (2000), “edge effects reduce habitat quality and the functional connectivity between them”.

Many bird species in the area rely on the kind of continuous forest cover that is rarely found except in areas like the unique geological area, The Driftless. The waterways, valleys, and stone croppings that comprise the Driftless area create an environment in which many deep forest species—including birds like black-throated blue warblers, Canada warblers, golden-winged warblers, prothonotary warblers, wood thrushes and ovenbirds thrive. All of these birds would be negatively affected, exacerbating the continuing decrease of populations of song birds all around the country.

In addition, Ortega & Capen (2002) discussed findings that nest predation and parasitism by cowbirds increased along forest edges, leading to declines in songbirds who require undisturbed and unfragmented forests. Conservation groups, like the WI Bird Conservation Initiative, have worked for years to conserve habitat for endangered, threatened and rare bird species, but this work would be destroyed by the large scale destruction and maintenance of a 100-125 mile long corridor.

There are other negative implications of the edge effect, not the least of which is the creation of a virtual corridor for the transmission of CWD. According to the WI DNR, CWD is most prevalent in western Dane/Eastern Iowa County along with another area in southeastern WI along the Illinois border. Deer are a classic edge species, and creating a 100-125 mile highway for them is a perfect prescription to increase the prevalence of this serious disease.

## NEGATIVE EFFECTS ON OTHER MAMMALS

Several threatened and rare mammals are at risk from the habitat degradation that is inevitable with the construction of this project. Bats are particularly vulnerable, including the state-threatened big and little brown bats. Ground living mammals like Franklin's ground squirrels live in the area and have been found to be declining, as are prairie voles and woodland voles. Badgers, that iconic Wisconsin ground dweller, is rarely seen now, but appears to hold out in some areas of the state, including SW Wisconsin. As a species they appear to do poorly around human disruptions, and there is little doubt that this project would decrease their numbers even more.

## NEGATIVE EFFECTS OF POWER LINE MAINTENANCE AND HERBICIDE USE

The use of herbicides like Roundup to maintain open corridors for power line maintenance should be a great concern to anyone with an interest in environmental and human health. Although there is still a great deal of research to be done, The World Health Organization has classified one of its ingredients, glyphosate, as "probably carcinogenic in humans". By itself, glyphosate has been shown to increase risk of Non-Hodgkin lymphoma (Schinasi & Leon 2014) and to be toxic to aquatic life by the European Chemicals Agency. Some studies have found no correlation between glyphosate and the occurrence of other human cancers, however, it is critical to note that most studies have used glyphosate not in the form in which it is used (as Roundup, for example) but as an isolated chemical. And yet, the "inert" ingredients in Roundup have found to be not inert at all, especially when interacting with glyphosate. For example, **polyoxyethylene alkylamine, an "inert" ingredient in Roundup, was found to be 2,000 times more toxic when mixed with glyphosate than lower doses of glyphosate only** (see the Intl Journal of Environmental Research and the Institute of Science in Society (2014)). These substances act as endocrine disruptors, which means that they can affect reproductive health and create severe developmental deficits in mammals and amphibians. There are no small numbers of amphibians who would be negatively effected by the power lines, especially some species of frog (pickereel frogs and Blanchard's cricket frog to name a few).

## HUMAN PSYCHOLOGICAL AND PHYSIOLOGICAL HEALTH WOULD BE NEGATIVELY IMPACTED BY CONSTRUCTION AND THE PRESENCE OF THE LINES

"Nature Deficit Disorder" is a term coined by Richard Louv, the author of *Last Child in the Woods*. It describes the value of time spent in nature on mental and physiological health, while it decries the decreasing time that American children spend in peaceful, natural settings, like the areas which would be negatively impacted by the proposed high-power transmission line. Time spent in natural settings has been found to be essential to healthy cognitive and psychological function. For example, Wells (2000) found that enhanced executive function in children (an important aspect of decision making), was the result of direct experience with nature. Time in undisturbed natural surroundings has also been found to reduce stress (Wells 2003). Burdette and Whitaker's study (2005) showed that important social behaviors like self-discipline and self-regulation were increased after time spent in natural settings.

These are not trivial findings, and have been replicated many times over. They are especially important because rates of anxiety and depression are not only on the rise in our country, but are at epidemic levels according to some. Anxiety is the leading mental health issue among young people (see for example, Bitsko et. al., June 2018), and yet standard treatments are often not effective or available to many. However, we know that time spent in peaceful, undisturbed natural settings reduces anxiety, as well as acting as a buffer to the kind of stress that many of us experience every day.

As a survivor of violent sexual assault and other violent trauma, allow me to add my personal story to the vast amount of data that supports the importance of undisturbed, natural settings, like those found in the areas that would be impacted by construction of massive transmission lines. I simply can not image functioning as well as I do now without the opportunity to take long walks on the Military Ridge Bike Path in Mt Horeb, to savor the scenery on our drives through SW Wisconsin, and hiking in parks like Blue Mound State Park and Governor Dodge State Park, as well as time spent bird watching along the Mississippi Flyway—all of which would be destroyed by the imposition of huge, ugly and noisy transmission lines.

## SUMMARY

As I write, I think of the words of one of Wisconsin's most famous men, Frank Lloyd Wright:

*"Nothing picks you up in its arms and so gently, almost lovingly, cradles you as do these southwestern Wisconsin hills."*

A tremendous amount of this would be destroyed by the construction of the CHC line. A multitude of animal and plant species would be negatively affected, as would human health. The benefits to consumers are negligible, if not non-existent. The citizens of Wisconsin and the United States deserve better than this. I implore the USDA to deny the proposals of the C-HC investors.

Patricia B McConnell



**C-HC COMMENT Oct 2019- P McConnell .docx**

149K

As a landowner and hobby farmer southwest of Black Earth, WI, I am strongly opposed to this proposed project. I am also a PhD zoologist with knowledge of psychology, animal behavior and wildlife ecology. Based on all available information, this C-HC project is unnecessary, an economic boondoggle, and worst of all, an environmental disaster, all at the expense of the citizens and ecological health of our state.

Although the lines would not be built directly on our land, they would have a profound, and negative effect on my and my husband's life, as well as on the lives of hundreds of thousands of others who live here or travel from other areas. Like so many, we walk, hike and watch wildlife year round in many of the areas that would be affected by the construction of high-power transmission lines.

However, my primary concern is for the environmental health of the unique lands of the Driftless area, lands that include priceless habitat for several endangered, threatened and rare species. Listed below are the primary reasons that this project should be denied by the PSC, focused primarily on the environmental damage that this expensive and unnecessary project would inevitably cause.

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There are other negative implications of the edge effect, not the least of which is the creation of a virtual corridor for the transmission of CWD. According to the WI DNR, CWD is most prevalent in western Dane/Eastern Iowa County along with another area in southeastern WI along the Illinois border. Deer are a classic edge species, and creating a 100-125 mile highway for them is a perfect prescription to increase the prevalence of this serious disease.

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As I write, I think of the words of one of Wisconsin's most famous men, Frank Lloyd Wright:

*"Nothing picks you up in its arms and so gently, almost lovingly, cradles you as do these southwestern Wisconsin hills."*

A tremendous amount of this would be destroyed by the construction of the CHC line. A multitude of animal and plant species would be negatively affected, as would human health. The benefits to consumers are negligible, if not non-existent. The citizens of Wisconsin and the United States deserve better than this. I implore the USDA to deny the proposals of the C-HC investors.

Sincerely,

Patricia B. McConnell, PhD, CAAB Emeritus  
Emeritus, Department of Integrative Biology  
University of Wisconsin-Madison





David Reinhart &lt;comments@cardinalhickorycreekeis.us&gt;

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**CHC IES comment**

1 message

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**Aaron McGee** [REDACTED]  
To: comments@cardinalhickorycreekeis.us

Mon, Nov 25, 2019 at 8:29 PM

Dear Sirs/Madams,

I don't live anywhere near the proposed CHC line, and am opposed to it. For me, my friends, family, and neighbors it is not and never has been a Nimby issue. It is, however, a moral issue on many levels.

I don't think the lines are necessary. I believe that they would cost ratepayers too much to build and, more importantly, to maintain. Electricity usage is decreasing and will continue to do so with modern technologies and conservation measures, which makes the proposed lines essentially obsolete.

Upgrading the existing grid infrastructure could handle any future energy flow from sustainable wind and solar farms. This would cost less to build and maintain, yet would still give the for-profit ATC investors the financial returns they feel entitled to.

The IES is quite thorough, but I don't think that it adequately addressed the negative impacts the proposed line would have on our history (The Military Ridge, and Ho Chunk heritage), our farming and rural town heritage (including the Thomas Stone Barn and Barneveld Prairie which would have ruined views and visitation), the environment (including sensitive species whose larvae and migration could be impacted by the electromagnetic fields from the lines), our current farm, town, and city cultures that depend on unobstructed vistas of the Driftless Area, the effects CHC would have on long term school revenue from taxes (which would decrease from reduced property values along the line), the environmental impacts of building and maintaining the lines (cement, steel, wire, construction crew transportation, maintenance crew impacts, herbicides, etc.), and the emotional impacts of everyone near and far who travel the proposed corridor for vacation, tourism, commuting, and daily life.

I also am concerned about the potential effects (some likely still unknown) of electromagnetic fields on the health of people and other animals who live nearby such lines.

When the life of these lines would end (40 years or so) what would be the environmental impact of hiring crews to remove the lines and recycle the materials?

What are the impacts of mining the steel, copper, cement, oil, and other materials that would go into building this line? How much carbon would be emitted? How many foreign ecosystems would be harmed to extract the resources to build the lines? How many distinct and distant cultures would be harmed by powerful multinational mining companies to obtain the materials? How many foreign environmental activists who don't want extractive mining in their area (for resource-heavy projects like CHC) would be killed to

silence their opposition. This happens routinely with global trade of natural resources for projects in the developed nations. Is the link between foreign extraction of materials for CHC and its impact on others' cultures and foreign ecosystems thoroughly considered in the EIS? I suggest that is isn't, but should be.

Finally, would building this CHC line lead to eventual expansion of other lines in the Driftless Area? If so, what would their combined impact be? It is not clear whether a for-profit company without enough regulation might continue their erroneous push for additional transmission line projects in the area if this one is approved.

Thank you for considering my thoughts and for your efforts.

Aaron



David Reinhart &lt;comments@cardinalhickorycreekeis.us&gt;

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**comments on Final Federal EIS**

1 message

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**Susan Michmerhuizen** [REDACTED]  
To: comments@cardinalhickorycreekeis.us

Sun, Nov 24, 2019 at 8:50 AM

This email follows up on my comments to the Draft Federal EIS. Those initial comments are noted on page F-195 of this Final EIS. The Final EIS response to my comments reflects regulations and best practices that ATC will use in building and maintaining Ch-CH. However, those practices and regulations have little relationship to what actually happens on the ground in our communities. While it is good that landowners can refuse to have herbicides applied to ROWs on their property that is insufficient to protect the groundwater of Southwest Wisconsin from further contamination and toxicity. First, groundwater does not adhere to property boundaries; water flows from property to property both above and below the ground. Applying herbicides to one parcel of land can easily contaminate the well of a landowner down the line who has refused herbicide application on their land. Second, ATC has a history of sneaky practices to get landowners to sign off on herbicide applications. In Seymour, Wisconsin, ATC hung placards on the doorknobs of ROW property owners to alert them of ATC's tree trimming. ATC asked landowners to sign the placards indicating they were aware of the trimming. On the backside of the placard, in very small print, it was noted that a landowner's signature also gave permission for ATC to use herbicides on the ROW. This is a well-known trick used by credit card companies and business to pretend transparency while actually hiding controversial practices.

Southwest Wisconsin already has documented chemical toxicities in the ground water created by the very herbicides that are legally permitted for ATC to use. Our soils are shallow and they sit on very porous limestone rock. This means that herbicides that might be okay to use in other parts of the state definitely seep into the groundwater of Southwest Wisconsin. It is unsettling that an environmental impact statement does not take the specific geology of the region into consideration. Wells are currently being tested by governments of Lafayette, Grant, and Iowa counties as part of the Southwest Wisconsin Groundwater and Geological Study (SWIGG). The fact that the SWIGG study, and its results, is not even acknowledged in the EIS leads me to believe that the report is not interested in factual data as a basis for its recommendations. It also is a strong indication that the EIS data collection and analysis lacks depth and thoroughness.

Sincerely,

Susan Michmerhuizen  
[REDACTED]



David Reinhart &lt;comments@cardinalhickorycreekeis.us&gt;

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**CHC Final EIS Comment Mittelstadt**

1 message

**Mark Mittelstadt** [REDACTED]

Fri, Nov 22, 2019 at 11:37 AM

To: Comments &lt;comments@cardinalhickorycreekeis.us&gt;

**Comments of Mark Mittelstadt****Final Environmental Impact Statement****Cardinal-Hickory Creek Transmission Line Project**

November 22, 2019

**The Final Environmental Impact Statement for the Cardinal-Hickory Creek Transmission Line Project is woefully inadequate, including with regard to rare species and habitats. Scoping comments and critiques of the draft EIS, by myself and others, have been ignored by RUS.**

**Surveys for Rare Species & Habitats Have Not Been Done**

I have been a forester in southwest Wisconsin for about 40 years and have considerable experience with the landscape and ecology of the area generally, and with rare ("Special Status") habitats and species. My approach to forestry is holistic and includes consideration of wildlife and flora beyond just the trees. Over the years, I have found quite a few locations of rare plants, rare animals, and rare habitats like savannas and pine relicts, which are not recorded.

As explained in my Draft EIS Comments, I am very concerned that the RUS's environmental review process has not included actual surveying for species & habitats along the entire route. This issue has not been resolved in the FEIS.

FEIS acknowledges in Section 3.3.1.3 that:

*“Several state and/or federally listed plant species have the potential to occur in counties crossed by the C- HC Project.” Yet it also says, “Targeted plant inventories have not been completed for the project.”*

In the response to comments, the FEIS asserts:

*“EIS Sections 3.3 and 3.4 address impacts to special habitats (e.g., pine relicts) and rare plant and animal species. Additionally, analyses were based on various datasets and at varying levels of resolution and detail that are sufficient to disclose the potential impacts of the C-HC Project to these resources.”*

I strongly disagree that the analyses done by RUS are sufficient to disclose the impacts of the transmission line. I have personally discovered over 100 new locations of various rare species and a similar number of new locations of rare habitats, although I have not covered even 5% of the forests in this area. A simple extrapolation would suggest that many more unknown locations are out there, and a 100+ mile transmission line would affect many of them. The streams, wetlands or other habitats would have additional occurrences.

It is not adequate to only examine existing records of locations already known to an agency. This approach will necessarily miss many important resources that would be affected. This lack of detail is reflected in the FEIS. Section 3.3 “Vegetation, including Wetlands and Special Status Plants” acknowledges that most of the information on vegetative communities was obtained by looking at the WDNR Natural Heritage Inventory. Yet the NHI is only based upon occurrences reported to the WDNR-NHI staff. As stated in my Scoping and DEIS comments, many locations have not been explored so many occurrences are not yet known, and many known occurrences are not reported to the NHI.

Section 3.3.1.1 provides general descriptions of the ecoregions that the line would pass through and describes some characteristic or typical species, but it does not describe specific observations or species actually found in any of the route locations.



3.4 “Wildlife, including Special Status Species” says it “presents the occurrence and distribution of wildlife species within the analysis area, including... special status species”.

Yet the statement is clearly made in 3.3.1.3;

***‘Targeted inventories have not been completed for the project’.***

### **RUS Was Well Aware That Such Surveys Were Necessary.**

As I stated in my Draft EIS Comments, I personally spoke with Dennis Rankin of RUS during Scoping about the need of surveys, and I told him that there are experts in the relevant fields who would be competent to do these surveys.

**Mr. Rankin asked me if I know of such experts, and I assured him that I would be glad to provide whatever he’d need. This shows that he understood the need of surveying and its importance to the EIS.**

**Mr. Rankin was also in the hearing room, when I made my DEIS comments that such surveys and information were lacking in the DEIS. But to date, I have not been asked for such contacts or heard anything further from RUS. Nor have any of the experts with whom I am acquainted said that they have been contacted by anyone regarding CHC or these issues. Nor is any such information included in the FEIS.**

The FEIS stated:

*Field surveys were conducted for portions of the proposed project area with access permission. For those areas where access was not provided, the most recent datasets were used to characterize existing resource conditions.*

Nearly all of the land along the CHC routes is privately owned. It seems unlikely that landowners were asked for permission. (I manage the prairie at Deer Valley Golf Course, which is a really nice, high quality prairie with a lot of diversity and about 20 rare species including a Federally Listed species. The preferred CHC route would cross Deer Valley, and NHI records include these species on this property, yet they were not even asked for permission to conduct any survey. Other landowners, including some with rare species & habitats, have also not been contacted for permission to survey.) Further, the EIS does not mention any such land surveys, let alone surveys of all or most of the proposed routes.

Because the FEIS has not carried out surveys for rare species or habitats, it cannot adequately describe the impacts.

Section 3.3.2 says:

*“This section describes impacts to vegetation associated with the construction, operation, and maintenance of the C-HC Project. Impacts to vegetation are discussed in terms of impacts to vegetation communities, special status plants, and invasive species.”*

Section 3.4 says

*“This section presents the occurrence and distribution of wildlife species within the analysis area, including... special status species.”*

But in fact they only describe regions in broad general terms, and name a few representative species. While a list of Special Status species is provided, there is virtually no mention of the existence or absence of those species, nor of any efforts to survey for them.

It should be noted that invasive species impacts were given the same scant treatment. While my earlier comments did not focus on invasive species, others commenters did so, and their concerns have not been addressed in the FEIS.

Section 3.3.1.3.3 says:

*“The 2017 fieldwork did not include targeted surveys to identify all invasive species (Dairyland 2016b).”*

The FEIS therefore cannot accurately describe how invasive species may be spread along the transmission line route. Nor is there any mention of the ongoing work which would be necessary over the years to control invasive species.

**The FEIS cannot describe the impacts if the CHC line was built because it does not even know which rare communities, Special Status plants or animals, or invasive species are on the route.**

**The EIS leaves it up to the Applicants to do the work that RUS should have done**

The EIS seems to excuse the lack of surveys or information by saying;

*“...Utilities would complete vegetation surveys prior to construction...”*

It's difficult to believe --

a) that the Utilities which have not yet bothered to look for rare species or habitats, would then decide to make a sincere effort to find them after they would already have approval to build the line.

b) that the profit-driven companies would hire any credible specialists to survey the areas, who might report rare species or habitats, which would delay or prevent construction.

c) that the entire process of application for a new route, including public comments and new maps and new surveys, would be reenacted to avoid any such locations that would be discovered.

The FEIS does not even explain why it believes the utilities would do such surveys, or what consequences or resolutions would occur if the utilities failed to survey or turned a blind eye to whatever might be there.

**It is not adequate for RUS to shirk its responsibility or to rely on a for-profit company to act against its own best interest.**

### **Species Lists Used in the FEIS Are Highly Inadequate**

Section 3.4.1.2.2 “Birds” says;

*“There are 316 bird species native to Iowa and Wisconsin that may be present year-round, or as migrants. Ten are species considered “at risk” following NatureServe’s Standards and Methods for assessment (Ridgely et al. 2003).”*

I am not highly knowledgeable about birds, yet I recognize 24 rare bird species which occur in the Wisconsin portion of the Project Area and are on DNR’s NHI list of rare birds (<https://dnr.wi.gov/topic/EndangeredResources/Animals.asp?mode=list&Grp=7>). An expert would probably recognize more than these 24.

NatureServe seems an odd source to use for rare bird species in southwest Wisconsin, and the use of 2003 methods or information is suspect as well.

3.4.1 relies in substantial part upon;

*“...the Audubon Society’s current Christmas Bird Count data for Cassville, Dubuque, Fennimore, and Mount Horeb were reviewed, as these systematic*

*surveys provide information on resident bird populations (National Audubon Society 2018)."*

This count is done in late December and early January, long after many migrating species have left the state and the region. Summer nesting habitat is critical for most rare species. Nesting bird surveys are usually done in June. No information is provided in the FEIS re bird populations in the summer.

Appendix E "Special Status Plants List"; lists only 34 species which might occur in the Project Area in Wisconsin. From just a very brief review of the list, and no input from plant experts, I find numerous species missing; these are species which I know occur in the Area because I have found populations of each. Perhaps more concerning is that I have reported each to the NHI database from one or more locations, yet they don't show up in Table E or in the FEIS. These include; cream gentian, yellow hyssop, great white lettuce, Firepink, violet bush clover, glade mallow, heart leafed skullcap, great Indian plantain and swamp agrimony. If the list was further scrutinized by experts, it's extremely likely that many more species would be found to be missing.

Section 3.4.1.2 "General Wildlife Species"; does not seem to include any insect species (and only 6 rare species are noted elsewhere). Yet DNR's NHI list of Special Status insects (<https://dnr.wi.gov/topic/EndangeredResources/Animals.asp>) includes such a large number of such species, that its probable that dozens exist in the Project Area.

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*"For all action alternatives, impacts to vegetation would be moderate, impacts to special status species would be minor, and impacts to invasive species would be*

*minor.”*

This statement flies in the face of a huge body of experience, research, experts' opinions and agency programs. It is bluntly absurd. Volumes of information are available from various agencies, including ones which the FEIS has used, which would clearly show RUS that impacts of a project such as CHC is very significant to Special Status species. The impacts to most Special Status species would be to wipe out the population.

**It does not seem appropriate for any EIS to avoid considering listed rare species or habitats, to selectively sort information for the benefit of the Applicants, or to rationalize that habitat destruction or population decreases are OK.**

**The FEIS greatly deficit in many ways, including in its attempt to minimalize impact to rare species and habitats. RUS has ignored its obligation to do a robust examination of the resource and possible impacts; instead RUS has made a concerted effort to avoid recognizing what is on the land and would be damaged. RUS has ignored Scoping Comments and Comments on the Draft EIS.**

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Final Environmental Impact Statement  
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November 22, 2019

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**The FEIS reads as though it was developed by the Applicants, solely for their benefit. It must be rejected as inadequate, and must be replaced by a real EIS.**

sent in to at 12:18 PM 22 November 2019

RECEIVED  
NOV 01 2019

Federal Fish &  
Wildlife Service

No high voltage  
power lines in  
our wildlife  
Refuge.

We need to  
save our wildlife  
areas for our  
grandchildren &  
great grandchildren  
Thank you  
Pam Mae

MILWAUKEE WI 530

29 OCT 2019 PM 8 L



SWCA Environmental  
Consultants  
80 Emerson Ave.  
Suite 1306  
P.O. Box 11111  
Portland, OR





David Reinhart &lt;comments@cardinalhickorycreekeis.us&gt;

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## Stop the CHC Transmission Line Project

1 message

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**Ellen Myers** [REDACTED]  
To: comments@cardinalhickorycreekeis.us

Mon, Nov 4, 2019 at 9:09 PM

To U.S.D.A. Rural Utilities Service:

DON'T give ATC, ITC, and Dairyland the permit to cross the Mississippi River with these massive transmission lines. DON'T give Dairyland a loan. Say NO!! The C-HC is NOT NEEDED!! There are better LOCAL Non-Transmission Alternatives - Local renewable energy.

Also, the PSC staff came up with a good alternative which was to repair and improve existing lines. This would be much less costly. But, the commissioners ignored this proposal even though over a thousand people sent in comments and went to hearings opposing the C-HC transmission line.

What's important? What's really important? People's lives, health, and communities, the environment-the beauty of nature, the rivers, the land, wildlife and home and family.

Think about what is really important in life and say NO to massive transmission lines now!! Don't give these greedy corporations permission to damage the lives and the environment of the people in the driftless area of southwestern Wisconsin.

Please listen to the voice of the people and help us fight this project. Thank you for your consideration.

Sincerely, Ellen Myers  
[REDACTED]



David Reinhart &lt;comments@cardinalhickorycreekeis.us&gt;

---

**Please reconsider the CHC line!**

1 message

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**Jason Neton** [REDACTED]  
To: comments@cardinalhickorycreekeis.us

Mon, Nov 11, 2019 at 9:08 AM

We have been living in Wisconsin for only 5 years now, but realize just how special this state and this land is. The Driftless region ecology is so rare and special, it should have special consideration for not marring with un-needed and unwanted towers. There is not a growing demand, and these lines are not truly needed. We should also be considering much lower cost alternative projects for investing in local distribution which is better in the long run for many reasons. Our grid has gotten to large and reliant on long runs between generation sites and we need to think forward.

But, the most important reason for not doing this is the land. The impact will be so profound, and this is NOT something you can un-do. Ever. You get one chance to make a decision that will affect literally generations by stopping this. What is the acute need? Is there compelling reason that this MUST go forward? There is NOT..... and the Environmental assessment needs to be thorough and complete and vigilant. Please do not do this to our land! We are stewards of the land, and this is us ruining our natural resources for a reason that has not been proven but will surely make some very wealthy as they only get paid if they build towers.

Stop this madness please and consider the land, and the people that inhabit it for generations to come.

Thank you,

Jason Neton  
[REDACTED]