



David Reinhart <comments@cardinalhickorycreekeis.us>

Comments on the Final EIS

1 message

Bobbi Peckarsky [REDACTED]

Fri, Nov 1, 2019 at 3:43 PM

To: comments@cardinalhickorycreekeis.us

Cc: Ann Jaworski [REDACTED] Rachel Granneman [REDACTED]

To whom it may concern:

Attach please find my comments on the Final EIS for the proposed Cardinal-Hickory Creek Transmission Line.

Thank you for considering these comments.

Sincerely,

Barbara L. Peckarsky

Departments of Integrated Biology & Entomology
University of Wisconsin
Madison, WI 53706

[REDACTED]

[REDACTED]

 **FEIS C-HC Transmission Project Comments Peckarsky-Nov1.2019.pdf**
167K

Comments on Final Environmental Impact Statement (FEIS) for the proposed Cardinal –Hickory Creek Transmission Line

PSC Docket 5 –CE-146

Submitted by: Barbara L. Peckarsky, Emeritus Professor of Stream Ecology, Cornell University, and an Honorary Fellow in the Departments of Integrative Biology and Entomology at the University of Wisconsin Madison

Date: 21 October 2019

I received my PhD in Zoology at the University of Wisconsin Madison in 1979, and held a faculty position in the Departments of Entomology and Ecology and Evolutionary Biology at Cornell University from 1979- 2005, after which I moved back to Madison to continue my professional career. I have taught classes in Stream Ecology and Aquatic Entomology for 40 years at Cornell and UW, and have 45 years of experience conducting research and mentoring graduate and undergraduate student researchers of stream ecology. My recent research focuses on the effects of hydrologic disturbance related to climate change on the interactions among organisms in stream food webs, including impacts on fish, invertebrates and algae. I have published a textbook on the *Freshwater Macroinvertebrates of Northeast North America* (Cornell University Press), and received teaching, mentoring and research awards both at Cornell and UW Madison.

My comments below indicate whether the FEIS resolved problems I identified in the DEIS with regard to three primary potential impacts of the proposed C-HCT project on rivers, streams and floodplains (aquatic resources excluding wetlands and ponds/lakes) (as stated on p. 228 of the FEIS):

- 1) Potential adverse impacts on stream **water quality** caused by construction activities or discharges during construction or maintenance of structures
- 2) Potential changes to stream **water quantity** caused by diversion of water from streams, primarily during construction
- 3) Impacts to **floodplains** due to disturbance and fill associated with project footprints, during both construction and maintenance of structures

My main concern with the DEIS was that despite the document clearly articulating potential impacts of construction and maintenance of the transmission line on aquatic resources in its path, information on mitigation of those impacts and restoration of damaged habitats was inadequate. I provided detailed suggestions for areas that needed more information. However, the only suggestions incorporated into the FEIS were clarification of Wisconsin's Outstanding and Exceptional Resource Waters and corrections of the descriptions of trout streams that would be affected in the analysis area. None of my other comments on the DEIS were incorporated into the FEIS. Therefore, my comments below indicate that the FEIS similarly provides detail on the expected impacts of the proposed C-HCT project (p. 226); but **information is still lacking with regard to avoidance, mitigation or restoration measures associated with construction and**

maintenance of the required structures for the transmission line (*highlighted in bold, italic font*). I have provided citations of scientific literature to corroborate problems remaining in the FEIS outlined in these comments. My comments are relevant to all alternative proposed paths, the impacts of which differ only slightly depending on numbers of stream crossings and floodplains disturbed.

1) Water Quality Issues

The most damaging impact of the project on stream water quality will result from the **clearing of vegetation and disturbance of soils in the riparian buffer zones** in the ROW during both construction and maintenance of the transmission towers that are adjacent to stream crossings. Clearing vegetation and grading the riparian zone disturbs and exposes soils, subjecting them to accelerated erosion. Silt loam soils, which are the most erodible of all soils, predominate in the analysis area. All alternatives would destabilize particles and produce high rates of runoff within the 300 ft. ROW corridor. Less stable, more erodible soils result in reduced storm water infiltration and increased runoff volume, runoff velocity, sediment-carrying load and cutting power of water flowing downhill. Some effects would be temporary (road access and construction impacts), and others permanent (removal of existing soils for footprints of foundations, compaction of soils by heavy equipment, removal of vegetation shading riparian buffer zones.)

Sedimentation is the most common form of construction impact whereby storm water is moved into nearby surface waters as a consequence of ground disturbance. The negative effects of sedimentation resulting from disturbing riparian zones of streams have been well documented by stream ecologists (e.g., Gregory et al. *Bioscience* 1991). Also, there are a number of **endangered and threatened species** (mussels, fish, insects) in the analysis area, which are especially vulnerable to sedimentation, especially in the Mississippi River National Wildlife and Fish Refuge.

The FEIS does acknowledge that construction and maintenance activities will increase sediment loads and reduce water quality (p. 228). The Utilities propose to work with the IDNR and WDNR to develop an erosion control plan prior to construction (p. 135) that implements Best Management Practices (BMPs) near streams to minimize erosion and prevent sedimentation (p. 227); but as in the DEIS, ***no details are provided. Plans for erosion control should be spelled out in detail in the FEIS with evidence of their effectiveness. There are alternative designs for erosion control. Which would be used and why?*** On p. 228 of the FEIS, the Wisconsin BMPs are referred to as “standard industry practices.” ***However, the Wisconsin BMPs are often inadequate for protecting stream water quality, because of their frequent inclusion of caveats such as BMPs should be implemented “when practical”, “when implemented properly” or “to the extent possible”.*** For example, language in the FEIS states that heavy equipment will be kept out of flowing stream channels and active drainages ***“to the extent possible”*** (p. 203). I interpret that statement to mean that when not possible, heavy equipment WILL be entering stream channels and active drainages, which will damage the organisms present in the stream and can cause irreparable damage to stream habitats. ***The FEIS***

*needs to address that issue, estimating how many stream crossings in the project area have conditions where the BMPs are not possible or practical to implement. The Utilities also propose to regularly inspect and maintain erosion controls “until exposed soil has been adequately stabilized” (p. 135). **Is the plan to inspect every site after every storm water event? Otherwise, erosion controls may be breached during storm events causing sedimentation of erodible soils into vulnerable streams, especially considering the climate-change-driven increase in hard rains and flooding events.***

It is clear that for safety issues, all tall vegetation adjacent to surface water bodies needs to be removed. Long-term adverse effects of **removal of shade trees** can cause elevated stream water temperatures (Hynes 1975, Gregory et al. 1991) and alter local and downstream habitats (Vannote et al. 1980), thereby adversely affecting conditions necessary to support trout in cold-water streams, as well as many of the aquatic insects that serve as trout food sources (e.g. mayflies). The FEIS acknowledges that tall vegetation cannot be allowed to reestablish within the ROW for safety purposes; therefore impacts to trout streams are expected to be “*moderate and long term*” (p. 228, p. 236). However, on p. 236 they state that impacts of tree removal in the ROW will be temporary, “until permanent vegetative cover is reestablished.” I suspect they are only referring to impacts on sedimentation. *The FEIS needs to clarify what kind of vegetation will be planted in de-vegetated riparian zones. If the re-vegetation includes low-lying plants that do not provide shade, impacts on stream water temperatures will not be mitigated even if such re-vegetation stabilizes soils and minimizes erosion. The DEIS needs to include a specific plan for reestablishing permanent vegetative cover in the ROW that will maintain habitat for trout and insects where the transmission lines cross riparian corridors of sensitive streams.*

The FEIS also states that **no transmission line or temporary structures will be located within the ordinary high water mark (OHWM) of streams** (p. 227). *However, such bankfull conditions are often exceeded during floods, which are becoming more extreme and more frequent as a consequence of climate change (locally: e.g. the August 2018 flood in the Black Earth Creek watershed, and globally: IPCC Report 2018). Therefore, keeping structures out of the stream channel will not be enough to prevent damage, because structures in the floodplain (also see section 3 below) will be increasingly vulnerable to erosion given the effects of more frequent flooding. The FEIS needs to address this issue.*

The FEIS also states that the construction of **Temporary Clear Span Bridges (TCSB)** supported by beams placed above the OHWM will prevent driving heavy equipment through streams (p. 135, 227). However, in streams too wide to clear the span, temporary bridges with in-stream support would be designed and constructed. *How many sites would require in-stream supports? According to the inventory of stream crossings > 1000 ft. that number may be as many as 14 sites, including the Mississippi River. The FEIS needs to address this issue specifically. Wisconsin (but not Iowa) requires a permit to build TCSBs over navigable waters. Also, more information is needed to elaborate on proposed attempts to minimize stream crossings by using existing structures and working with private landowners. Existing structures may need to be*

fortified to handle heavy equipment. Will landowners already unhappy about having massive towers in their yards cooperate with the Utilities? The FEIS inadequately addresses those issues.

Finally, the FEIS needs to specifically outline plans for avoiding and/or mitigating spills of hazardous materials or other discharges (e.g., petroleum products, herbicides) during construction and maintenance of the transmission towers, rather than simply stating they would follow the BMPs and employ a Certified Pesticide Applicator (p. 135). Specifically, how will following Wisconsin BMPs minimize accidental release of contaminants, runoff of herbicides, erosion and movement of sediment in storm water due to ground disturbance?

2) Water Quantity Issues

The FEIS stated that **extraction of water** to fill excavation sites for construction of towers and for other construction purposes would be scheduled to “*attempt to* avoid spawning periods (p. 136). Plans are to coordinate with IDNR and WDNR to discharge extracted water to a non-sensitive upland site to facilitate re-infiltration to the aquifer. Dewatering of streams is well known to have negative ecological consequences on groundwater levels and stream organisms (Carlisle et al. 2010). Importantly, fish are not the only stream organisms sensitive to alterations in the natural flow regime (Poff et al. 1997, Lytle and Poff 2004). It is well established that water extraction schemes, for whatever purposes, need to take into account the negative impacts on organisms that depend on natural seasonal flow fluctuations. Such extractions can also affect stream water temperatures, depending on the volume of water extracted. *Plans for extractions need to be developed in much more detail in the FEIS to demonstrate how the Utilities will mitigate or minimize damage to the stream organisms in sensitive streams.*

3) Floodplain Issues

All alternatives would entail crossing tens of thousands of feet of floodplain (21,000 – 43000 ft. depending on the alternative). The FEIS clearly articulates the many benefits of floodplains (p. 221) and the Utilities understand the need for complying with regulations for development in floodplains. Fig. 3.5.2 (p. 223) illustrates all the 100-year floodplains in the analysis area including a 1.5-mile wide corridor around the Mississippi River. The FEIS proposes to avoid constructing structures in the floodplain and to place structures several hundred feet outside the channel banks (p. 227), both of which conditions will not always be possible. *Floodplains greater than 1000 feet wide cannot be spanned and therefore, it would not be possible to comply with the criterion of staying out of the floodplain. For wider channels, like the Mississippi River, supports would need to be constructed within the channel, which would have permanent long-term effects.* Structures need to be elevated above the base flood elevation “*where possible*”. *If not possible, what is the plan for constructing those towers? These issues could create difficulties for permitting needed to complete the project. Construction and maintenance activities in regulated floodplains require applications for Floodplain Development Permits from Iowa and Wisconsin. Furthermore, a Section 408 review is*

needed to construct towers within base flood areas (100-yr floods). In addition, 100-year floods are occurring at much greater frequency now associated with climate change (IPCC Report 2018), which should be considered in the analysis of what areas of the floodplain may be vulnerable to destruction by floods, and destabilized by the construction and maintenance of transmission towers. What is the appropriate timing for obtaining permits (before or after completion of the FEIS)? At the very least the permitting process should be more clearly specified in the FEIS, and the consequences of failure to obtain necessary permits need to be considered.

A related issue is that the Mississippi River is designated as a “Meandered Sovereign River” in the analysis area. Proposed construction in the river and its floodplain requires a Sovereign Lands Construction Permit. *Should that permit be acquired before initiating a project that could have deleterious effects on this protected resource?* The FEIS includes a brief mention of plans to restore bottomland hardwood forest on the floodplain of the Mississippi River; *however none of the restoration plans are specified, with no indication of their efficacy in mitigating construction impacts on sensitive species and habitats in this valuable, protected resource.*

Cumulative, unavoidable, irreversible or irretrievable impacts

The FEIS recognizes the following cumulative, unavoidable, irreversible or irretrievable impacts of the proposed C-HCT project (p. 524–25): 1) construction and maintenance of any chosen alternative would result in **long-term adverse impacts to habitat**; 2) the long-term effects of maintenance of the transmission line would **permanently affect floodplains** sustained through the life of the project; and 3) construction of the project would **affect water resources through land clearing, filling and occupation by project facilities**. Nonetheless, they assert that project would not affect long-term floodplain or groundwater productivity since those areas would either be restored to pre-project conditions as a mitigation measure or through natural recovery. *However, the FEIS provides no information on how mitigation, restoration or recovery would actually happen. Those plans need to be included in this document.*

Summary

The FEIS recognizes many potential impacts, but provides inadequate information with respect to the avoidance and mitigation of damage to sensitive rivers, streams and floodplains caused by construction and maintenance of the proposed Cardinal-Hickory Creek Transmission project. Specifically, this document needs to: 1) include specific plans to avoid or mitigate negative effects of construction and maintenance of the towers on stream water quality, with respect to erosion control, sedimentation, stream shading, water temperatures, flood-water retention, effects of temporary and permanent structures placed in stream channels, and accidental spills of hazardous materials; 2) demonstrate that extraction of water from sensitive streams will not damage aquatic life; 3) elaborate on how mitigation and restoration will be accomplished to prevent irreparable damage to valuable floodplains, especially the Mississippi River; and 4) provide a convincing plan for obtaining necessary permits that demonstrates a high probability that construction and

maintenance activities associated with the C-HC Transmission line in floodplains would be approved by regulatory authorities.

References Cited

- Carlisle, D. M., D. M. Wolock, and M. R. Meador. 2010. Alteration of streamflow magnitudes and potential ecological consequences: a multiregional assessment. *Frontiers in Ecology and Environment* 9:264-270.
- Gregory, S V., F. J. Swanson, W. A. McKee, and K. W. Cummins. 1991. An ecosystem perspective of riparian zones. *BioScience* 41(8); 540-551.
- Hynes, H. B. N. 1975. The stream and its valley. *Verhandlungun Internationale Verein Limnologie* 19:134-141.
- IPCC, 2018. Global warming of 1.5 degrees C. An IPCC Special Report on the impacts of global warming of 1.5 degrees C above pre-industrial levels. and related global greenhouse gas emission pathways, in the context of strengthening the global response to the treat of climate change, sustainable development and efforts to eradicate poverty. 32pp.
- Lytle, D. A. and N. L. Poff. Adaptation to natural flow regimes. *Trends in Ecology and Evolution* 19:94-100
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- Vannote, R. L., G. W. Minshall, K. W. Cummins, J. R. Sedell and C. E Cushing. 1980. The River Continuum Concept. *Canadian Journal of Fisheries and Aquatic Sciences* 37:130-137.



David Reinhart <comments@cardinalhickorycreekeis.us>

EIS

1 message

Allen Pincus [REDACTED]
To: comments@cardinalhickorycreekeis.us

Sun, Nov 24, 2019 at 2:40 PM

1. The EIS statement did not pay enough attention to the possibility of wild fires being started by sparks from high voltage lines like the proposed CHC. There are several states besides California where wild fires have been ignited by these power lines.
2. There are elementary schools located right next to where the CHC line will be passing. In the village of Barneveld it will pass right over the playground. Several reputable scientific studies have shown higher risks of childhood cancer in children exposed to the electromagnetic fields coming off of high voltage lines. Below is a list of these studies:

Citations:

- Draper, G. et al, "Childhood Cancer in Relation to Distance from Power lines in England and Wales: A case-control study" British Medical Journal, Vol. 330, 2005
- Feychting, M. et al, Magnetic Field and Childhood Cancer - A pooled analysis of two Scandinavian studies" European Journal of Cancer, Vol. 31, Issue 12, Nov. 1995.
- Kabuto, M. et al, "Childhood Leukemia and Magnetic Fields in Japan: a case-control study of childhood leukemia and residential power-frequency magnetic fields in Japan", International Journal of Cancer, Vol. 119, Issue 3, 2006.
- Kheifets, L. et al, "Pooled Analysis of Recent Studies on Magnetic Fields and Childhood Leukemia", British Journal of Cancer, Vol. 103, 28 September 2010.
- Olsen, J. H. et al, "Residence Near High Voltage Facilities and Risk of Cancer in Children", British Medical Journal, Vol. 307, 1993.
- Savitz, David et al, "Case Control Study of Childhood Cancer and Exposure to 60 - HZ Magnetic Fields", Amer. Journal of Epidemiology, Vol. 128, Issue 1, July 1988.
- Tomenius, L., "50 - HZ Electromagnetic Environment and the Incidence of Childhood Tumors in Stockholm County" Bioelectricmagnetics, Vol. 7, 1986.
- Wertheimer, H. et al, "Electrical Wire Configurations and Childhood Cancer" American Journal of Epidemiology, Vol. 109, 1979.

Thank you for considering my comments.

Allen Pincus
[REDACTED]



David Reinhart <comments@cardinalhickorycreekeis.us>

(no subject)

1 message

Christine Powell [REDACTED]
To: comments@cardinalhickorycreekeis.us

Tue, Oct 29, 2019 at 5:35 AM

I am really disappointed that you would even think to allow the power line to go through this area. We need to continue to protect our wildlife areas for all future generations.
Just say no.



David Reinhart <comments@cardinalhickorycreekeis.us>

FW: Re:;public comment on federal register - why are us taxpayers being suckered into paying for this iowa transmission line - that power co is rich enough to pay by itself

1 message

Coleman Burnett [REDACTED]

Tue, Oct 29, 2019 at 11:56 AM

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

From: Jean Public [REDACTED]**Sent:** Wednesday, October 23, 2019 10:57 AM**To:** Rankin, Dennis - RD, Washington, DC <dennis.rankin@usda.gov>; info@taxpayer.net; media@cagw.org; info@njtaxes.org; info@afphq.org**Subject:** Re:;public comment on federal register - why are us taxpayers being suckered into paying for this iowa transmission line - that power co is rich enough to pay by itself

i see absolutely no reason why u.s. taxpayers are being suckered in to pay for this line expansion. if the dairy land wants bigger lines, they are making enough money to pay for that themselves. they have financing available to power companies. why are americans country wide paying for an iowa transmission line. i see absolutely no reasons for this. is it political in nature to buy iowa voters or what is going on here? why are us taxpayers country wide being suckered into paying for this?? also these li@yahoo.com

[Federal Register Volume 84, Number 205 (Wednesday, October 23, 2019)]

[Notices]

[Pages 56756-56758]

From the Federal Register Online via the Government Publishing Office [www.gpo.gov]

[FR Doc No: 2019-23049]

DEPARTMENT OF AGRICULTURE

Rural Utilities Service

Cardinal-Hickory Creek 345-kv Transmission Line Project

AGENCY: Rural Utilities Service, USDA.

ACTION: Notice of availability of a Final Environmental Impact Statement.

SUMMARY: Notice is hereby given that the Rural Utilities Service (RUS) has prepared a Final Environmental Impact Statement (EIS) to meet its responsibilities under the National Environmental Policy Act (NEPA) and the Code of Federal Regulations related to providing financial assistance to Dairyland Power Cooperative (DPC) for its share in the construction of a proposed 345-kilovolt (kV) transmission line and associated infrastructure connecting the Hickory Creek Substation in Dubuque County, Iowa, with the Cardinal Substation in the Town of Middle, Wisconsin (near Madison, Wisconsin). The Project also includes a new intermediate 345/138-kV substation near the Village of Montfort in either Grant County or Iowa County, Wisconsin. The total length of the 345-kV transmission lines associated with the proposed project will be approximately 100 to 125 miles, depending on the final route. DPC, along with the two other project participant utilities, American

Transmission Company LLC, and ITC Midwest LLC (together the Utilities) have identified proposed and alternate segments and locations for transmission lines and associated facilities and for the intermediate substation. DPC is requesting RUS to provide financing for its portion of the proposed project.

DATES: Written comments on this Final EIS will be accepted no later than 30 days following the publication of the U.S. Environmental Protection Agency's notice of receipt of the Final EIS in the Federal Register.

ADDRESSES: A copy of the Final EIS may be viewed online at the following website: <https://www.rd.usda.gov/publications/environmental-studies/impact-statements/cardinal-%E2%80%93-hickory-creek-transmission-line>.

A hard copy of the Final EIS is available for review at Dairyland Power Cooperative, [3521 East Avenue, South, La Crosse, WI 54602](#) and at 13 local libraries in the project area and the USFWS McGregor District Office in Prairie du Chien, WI which are listed below.

Library	Address
Allen-Dietzman Public Library.....	220 W Barber Avenue, Livingston, WI 53554.
Barneveld Public Library.....	107 W Orbison Street, Barneveld, WI 53507.
Dodgeville Public Library.....	139 S Iowa Street, Dodgeville, WI 53533.

Dubuque County Library, Asbury Branch.. [5290 Grand Meadow Drive,](#)
[Asbury, IA 52002.](#)

Eckstein Memorial Library..... [1034 E Dewey Street, Cassville,](#)
[WI 53806.](#)

Guttenberg Public Library..... [603 S 2nd Street, Guttenberg,](#)
[IA 52052.](#)

Middleton Public Library..... [7425 Hubbard Avenue, Middleton,](#)
[WI 53562.](#)

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Montfort Public Library..... [102 E Park Street, Montfort, WI](#)
[53569.](#)

Mount Horeb Public Library..... [105 Perimeter Road, Mount](#)
[Horeb, WI 53572.](#)

Platteville Public Library..... [65 S Elm Street, Platteville,](#)
[WI 53818.](#)

Potosi Branch Library..... [103 N Main Street, Potosi, WI](#)
[53820.](#)

Rosemary Garfoot Public Library..... [2107 Julius Street, Cross](#)
[Plains, WI 53528.](#)

Schreiner Memorial Library..... [113 W Elm Street, Lancaster, WI](#)
[53813.](#)

USFWS McGregor District Office..... [470 Cliff Haven Road, Prairie](#)
[du Chien, WI 53821.](#)

FOR FURTHER INFORMATION CONTACT: To obtain copies of the Final EIS or for further information, contact: Dennis Rankin, Environmental Protection Specialist, USDA, Rural Utilities Service, 1400 Independence Avenue SW, Room 2244, Stop 1571, Washington, DC 20250-1571, by phone at (202) 720-1953 or email Dennis.Rankin@usda.gov.

SUPPLEMENTARY INFORMATION: RUS is the lead agency for the federal environmental review with U.S. Fish and Wildlife Service (USFWS), U.S. Army Corps of Engineers (USACE), and the U.S. Environmental Protection Agency (USEPA) serving as cooperating agencies, and the National Park Service (NPS) as a participating agency.

The purpose of the proposed project is to: (1) Address reliability issues on the regional bulk transmission system, (2) alleviate congestion that occurs in certain parts of the transmission system and remove constraints that limit the delivery of power, (3) expand the access of the transmission system to additional resources, (4) increase the transfer capability of the electrical system between Iowa and Wisconsin, (5) reduce the losses in transferring power and increase the efficiency of the transmission system, and (6) respond to public policy objectives aimed at enhancing the nation's transmission system and to support the changing generation mix.

The Final EIS addresses the construction and operation of the proposed project, which, in addition to the 345-kV transmission line and associated infrastructure, includes the following facilities:

At the existing Cardinal Substation in Dane County, Wisconsin: A new 345-kV terminal within the substation;

At the proposed Hill Valley Substation near the Village of

Montfort, Wisconsin: An approximately 22-acre facility with five 345-kV circuit breakers, one 345-kV shunt reactor, one 345-/138-kV autotransformer, three 138-kV circuit breakers, and a 345-kV and 138-kV terminals;

At the existing Eden Substation near the village of Montfort, Wisconsin: Transmission line protective relaying upgrades to be compatible with new protective relays installed at the new Hill Valley Substation and replacement of conductors and switches to meet the Utilities' operating limits;

Between the existing Eden Substation and the proposed Hill Valley Substation near the village of Montfort, Wisconsin: A rebuild of the approximately 1 mile Hill Valley to Eden 138-kV transmission line;

At the existing Wyoming Valley Substation near Wyoming, Wisconsin: Installation of nine 16-foot ground rods to mitigate fault current contributions from the proposed project;

At either the Lancaster or Hillman substation, depending on the final route, equipment installation to use the optical ground wire that would be part of the C-HC Project;

Between the existing Cardinal Substation and the proposed Hill Valley Substation: A new 50- to 53-mile (depending on the final route) 345-kV transmission line;

Between the proposed Hill Valley Substation and existing Hickory Creek Substation: A new 50- to 70-mile (depending on the final route) 345-kV transmission line;

At the Mississippi River in Cassville, Wisconsin: A rebuild and possible relocation of the existing Mississippi River transmission line crossing to accommodate the new 345-kV transmission line and Dairyland's 161-kV transmission line, which would be capable

of operating at 345-/345-kV but will initially be operated at 345-/161-

kV;

[cir] depending on the final route and the Mississippi River crossing location:

A new 161-kV terminal and transmission line protective relaying upgrades within the existing Nelson Dewey Substation in Cassville, Wisconsin;

a replaced or reinforced structure within the Stoneman Substation in Cassville, Wisconsin;

Multiple, partial, or complete rebuilds of existing 69-kV, 138-kV, and 161-kV transmission lines in Wisconsin that would be collocated with the new 345-kV line;

At the existing Turkey River Substation in Clayton County, Iowa: One new 161-/69-kV transformer, three new 161-kV circuit breakers, and four new 69-kV circuit breakers;

At the completion of the C-HC Project construction and energization at the Turkey River Substation, Dairyland would retire and decommission approximately 2.8 miles of the existing N-9 transmission line (69-kV); and

At the existing Hickory Creek Substation in Dubuque County, Iowa: A new 345-kV terminal within the existing Hickory Creek Substation.

Among the alternatives addressed in the Final EIS is the No Action alternative, under which the proposed project would not be undertaken. Additional alternatives addressed in the Final EIS include six action alternatives connecting the Cardinal Substation in Wisconsin with the Hickory Creek Substation in Iowa. RUS has carefully studied public health and safety, environmental impacts, and engineering aspects of

RUS used input provided by government agencies, private organizations, and the public in the preparation of the Final EIS. RUS has considered all comments received on the Draft EIS and revised the EIS accordingly. Following the 30-day comment period for the Final EIS, RUS will prepare a Record of Decision (ROD). A Notice announcing the availability of the ROD will be published in the Federal Register and in local newspapers. Additionally, letters and emails will be sent to stakeholders.

In accordance with Section 106 of the National Historic Preservation Act and its implementing regulation, ``Protection of Historic Properties'' (36 CFR 800) and as part of its broad environmental review process, RUS must take into account the effect of the proposed project on historic properties. Pursuant to 36 CFR 800.2(d)(3), RUS is using its procedures for public involvement under NEPA to meet its responsibilities to solicit and consider the views of the public during Section 106 review. Any party wishing to participate more directly with RUS as a ``consulting

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party'' in Section 106 review may submit a written request to the RUS contact provided in this notice.

The proposed project involves unavoidable impacts to wetlands and floodplains; this Notice of Availability also serves as a statement of no practicable alternatives to impacts on wetlands and floodplains, in accordance with Executive Orders 11990 and 11988, respectively (see Final EIS Sections 3.3 and 3.5).

10/30/2019

SWCA Mail - FW: Re: public comment on federal register - why are us taxpayers being suckered into paying for this iowa transmission line - that power co is rich enough to pay by itself

Any final action by RUS related to the proposed project will be subject to, and contingent upon, compliance with all relevant Federal, State and local environmental laws and regulations, and completion of the environmental review requirements as prescribed in the RUS Environmental Policies and Procedures (7 CFR 1970).

Christopher A. Mclean,

Assistant Administrator, Electric Programs, Rural Utilities Service.

[FR Doc. 2019-23049 Filed 10-22-19; 8:45 am]

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David Reinhart <comments@cardinalhickorycreekeis.us>

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

1 message

Jean Public [REDACTED]

Sat, Oct 19, 2019 at 11:03 AM

To: "comments@CardinalHickoryCreekEIS.us" <comments@cardinalhickorycreekeis.us>, "information@sierraclub.org" <information@sierraclub.org>, "info@earthjustice.org" <info@earthjustice.org>, "foe@foe.org" <foe@foe.org>, "info@nyclass.org" <info@nyclass.org>, "center@biologicaldiversity.org" <center@biologicaldiversity.org>

stop allowing our national lands to be used by profiteers for their own cheap no cost way to run lines. WHY ARENT PROFITEERS NOW REQUIRED TO BUY PRIVATE LAND OR LEASE PRIVATE LAND FOR THIS PURPOSE. WHY THE HECK DO THEY HAVE THE RIGHT TO INVADE AND DESTROY EVERY BIT OF NATIONAL LAND FOR THEIR PROFITEERING., THE PUBLIC WHO OWNS THAT LAND GETS NOTHIG FOR THAT. WHAT THEY GET IS ENDLESS FIRES CAUSED BY TEH CHEAP WAY WE LET THESE USA PROFITEERS RUN THEIR LINES, I.E. PACIFIC GAS AND ELECTRIC. THE TAXPAYER SARE BEING MADE FOOLS OF BY A FOREST SERVICE THAT IS DOING NOTHING TO PROTECT THEM . OUR KIDS ARE LOSING NATURE EVBERY SINGLE DAY BY THE CATASTROPHIC WAY THAT OUR LANDS ARE BEING LOST TO ANIMALS AND TREES AND THE TREES THEMSELVES ARE OUR ONLY HOPE OF AVOIDIUNG CLIMATE CATASTROPHE. THESE PROFITERES COME IN AND MOW DOWN THE TREES AND CREATE AREAS WHERE NO ANIMAL CAN SURVIVE ANYMORE AND THEN THEY START FIRES. KEEP NATIONAL LANDS FOR THE 328 MILLION PEOPLE WHO OWN THEM. WE DONT OWN AND PAY FOR THEM SO THAT THESE PROFITEERS CAN RUN UP AND HURT US AND OUR LANDS.

THE CHEAP CHEAP RATES THAT THIS AGENCY LETS THE PROFITEERS PAY IS AN INSULT TO NATIONAL CITIZENS OF AMERICA. WE ARE BEING OVERRUN WITH BEING TAKEN ADVANATAGE OF. THIS COMMENT IS FOR THE PUBLIC RECORD. PLEASE RECEIPT. JEAN PUBLIEE

[REDACTED]

On Friday, October 18, 2019, 09:59:30 AM EDT, 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>

Save Wetland Area- Cardinal Hickory Creek EIS

1 message

Ana Reisinger [REDACTED]
To: comments@cardinalhickorycreekeis.us

Thu, Nov 7, 2019 at 2:51 PM

November 7, 2019

80 Emerson Lane
Suite 1306
Bridgeville, PA 15017

To: Fish and Wildlife Service
SWCA Environmental Consultants

Attn: Cardinal Hickory Creek EIS

I am writing to protest the construction of the power line (Cardinal Hickory Creek high voltage transmission line) through the Upper Mississippi River National Wildlife and Fish Refuge. This wetland area has international importance and is one of the most important corridors for fish and wildlife in the U.S. The public and residents have come together to adamantly oppose this unneeded high-voltage power line, which would irreversibly damage the landscape, ecology, and recreation economy of the area. It is critical that alternatives are closely re-examined and relocated so that the transmission line doesn't disturb the 39 acres of irreplaceable wetland refuge.

Sincerely,

Anastasia Reisinger

November 7, 2019

80 Emerson Lane
Suite 1306
Bridgeville, PA 15017

To: Fish and Wildlife Service
SWCA Environmental Consultants

Attn: Cardinal Hickory Creek EIS

I am writing to protest the construction of the power line (Cardinal Hickory Creek high voltage transmission line) through the Upper Mississippi River National Wildlife and Fish Refuge. This wetland area has international importance and is one of the most important corridors for fish and wildlife in the U.S. The public and residents have come together to adamantly oppose the high-voltage power line, which would irreversibly damage the landscape, ecology, and recreation economy of the area. It is critical that alternatives are closely re-examined and relocated so that the transmission line doesn't disturb the 39 acres of irreplaceable wetland refuge.

Sincerely,

Anastasia Reisinger
Anastasia Reisinger





MILWAUKEE WI 530

PER MIAMI CANTONMENT PA



Attn. Cardinal Hickory Creek EIS
80 Emerson Lane
Suite 1306
Bridgeville, PA 15017

15017-347231





David Reinhart <comments@cardinalhickorycreekeis.us>

Comments/Questions Regarding the Final Environmental Impact Statement for the proposed Cardinal-Hickory Creek transmission line project

1 message

M.E. Russell [REDACTED]

Sun, Nov 24, 2019 at 7:33 PM

To: comments@cardinalhickorycreekeis.us

Cc: pir@starkenergyplan.org

USDA Rural Utilities Service

Via Electronic Mail: comments@CardinalHickoryCreekEIS.us

Subject: Comments/Questions Regarding the Final Environmental Impact Statement for the proposed Cardinal-Hickory Creek (CHC) transmission line project

Dear Rural Utility Service Representative:

I have reviewed the Final Environmental Impact Statement for the CHC project (October 2019) and noted the following:

1. In Volume II, Chapter 3, **Section 3.4.2.3, "Impacts Common to All Action Alternatives"** the FEIS claims that the risk of avian collisions and electrocutions would be the same for all project alternatives; however, this does not take into account the fact that 345 kV power lines are high enough to result in more impacts by endangered species and species of special concern, such as the formerly endangered bald eagle. Why were the risks not quantified specifically based on the flight patterns/elevations of local and migratory birds with respect to the different heights of lines with different voltages? How many excess bald eagle (or other avian species) deaths are acceptable?
2. In Volume II, Chapter 3, **Section 3.13.2.3.1, "Electric and Magnetic Fields,"** why was there no quantitative analysis of how induced voltages could adversely impact persons, livestock, and wildlife?

Thank you for considering my concerns.

*..Mike*Michael E. Russell
[REDACTED]



David Reinhart <comments@cardinalhickorycreekeis.us>

Cardinal-Hickory Creek Transmission Line

1 message

Carolyn Schuldt [REDACTED]

Fri, Oct 25, 2019 at 11:49 AM

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

Being a native of Platteville, Grant County, Wisconsin and an active environmentalist, I am writing to voice my deep fear of and objection to the proposed transmission line in my home county and SW Wisconsin...I live in Peoria but keep "tabs" on Driftless Conservancy activities and admire what they and their supporters are endeavoring to do--STOP THIS UNNECESSARY DANGEROUS TRANSMISSION LINE AS IT IS PROPOSED OUT OF MY HOME COUNTY...

I have been in contact with the Driftless Conservancy in Dodgeville and stopped by in April to get further details on this "project" and find it unwanted generally by the people of the area affected....I reside in Peoria but still own property in Platteville and thus am taxpayer and do formally voice my opinion on it--don't let this happen!! There is enough disruption in our environment and safety today for further damage our land and endanger its concerned citizens.

Though I cannot voice my strong anti-transmission line views personally or give testimony, I am still forwarding this comment in the hopes that it reaches you in time.

I hope and pray the voice of the majority of our concerned citizens will lead to disapproval of this project as currently proposed.

Respectfully submitted,

Carolyn Schuldt

[REDACTED] Property Owner/Taxpayer
Senior Citizen, Environmentalist

I do not access social media but do email daily at libraries and follow political and environmental activities.



David Reinhart <comments@cardinalhickorycreekeis.us>

RE: letter and testimony

1 message

tim [REDACTED]

Sat, Nov 2, 2019 at 7:34 AM

To: dennis.rankin@wdc.usda.gov

Cc: comments@cardinalhickorycreekeis.us, John Koffe [REDACTED] Charley Scott [REDACTED]

Hello Dennis,

I have been reading the RUS-Final Environmental Impact Statement (October 19), and was surprised that Alternative 6 was selected as the preferred transmission line route. I believe your analysis regarding "Visual Quality and Aesthetics" and "Socioeconomics and Environmental Justice" is extremely flawed and completely understates the devastating economic impact the CHC line will cause Mount Horeb and nearby communities. I intend to submit a statement supporting this contention, but first need better resolution images of the Blue Mounds "Visual simulations" (Figs. 3.11-36 and 3.11-37). Would you please email these to me asap?

Also, it is my understanding that your staff at RUS validates (independently?) the ProMod analysis conducted by ATC and the Wisconsin PSC. In these analyses, what was the assumed power demand input for FoxConn? Furthermore, did your analysis support the findings of ATC and PSC?

Thanks,

Tim Scott [REDACTED]

From: tim [REDACTED]
Sent: Monday, April 01, 2019 10:33 PM
To: dennis.rankin@wdc.usda.gov
Cc: comments@cardinalhickorycreekeis.us
Subject: letter and testimony


Hello Dennis,

11/4/2019

SWCA Mail - RE: letter and testimony

Please accept the attached documents as my comment submissions related to the RUS Environmental Impact Statement review of the Cardinal Hickory Creek transmission line project.

Regards,

Charley (Tim) Scott, 

Engineer (retired), USDA-Forest Products Laboratory

Honorary Fellow, UW-Madison

11-6-19

RECEIVED
NOV 12 2019

11-6-19

Re: Cardinal-Hickory Creek EIS
From: Atty. Mark G. Sukowaty

This ATC power line is unnecessary in the first place. It is only for ATC's profit and greed.

ATC is trying to grab and take all the land easements it can now, before their transmission lines become obsolete.

To add insult to injury ATC now wants to cross the Mississippi River National Wildlife Refuge. ATC is not considering any alternatives presented by opposing parties. ATC is very intent on getting its way - as in "Right of Way". It will do anything to get it.

This ATC power line will be a degradation on the land of southwestern Wisconsin and on the Wildlife Refuge.

Future generations will see this, and ask how did you ever allow this to happen?

Atty. Mark G. Sukowaty

MILWAUKEE WI 533

NOV 2010 PM 14

FOREVER / USA

SWCA Environmental
attn: Cardinal-Hickory Creek E15
80 Emerson Lane, Ste. 1306
Bridgeville, PA 15017

15017-047291





David Reinhart <comments@cardinalhickorycreekeis.us>

Tesla

1 message

Jeff Tallard [REDACTED]
To: comments@cardinalhickorycreekeis.us

Mon, Oct 28, 2019 at 3:11 PM

Is anyone following the news regarding Tesla solar shingles? Advancements in battery storage technology and advances like solar shingles could completely change the way we view power distribution. I hope we don't look back 10 or 20 years from now only to find that we ruined the beautiful landscape unnecessarily.

Jeff Tallard [REDACTED]

Sent from my iPhone



David Reinhart <comments@cardinalhickorycreekeis.us>

Towers

1 message

Jean Vivian [REDACTED]
To: comments@cardinalhickorycreekeis.us

Fri, Nov 15, 2019 at 7:17 AM

I have a number of reasons to disapprove of these. Some, but not all, are as follows:

They are environmentally very bad—health risks to humans AND wildlife.

High voltage wires will be directly in my viewpoint from “my backyard.”

I choose to live in a peaceful rural community. I don't expect to live in an industrial area, which the monstrous towers become.

Underground is the only acceptable way, if truly needed!

Please listen to the people.

Jean Vivian
[REDACTED]

Sent from my iPad



David Reinhart <comments@cardinalhickorycreekeis.us>

The uselessness of the Federal EIS

1 message

lila zastrow [REDACTED]
Reply-To: lila zastrow [REDACTED]
To: comments@cardinalhickorycreekeis.us

Mon, Nov 18, 2019 at 1:17 PM

What is the point of an EIS if you do not follow up on our concerns? Our comments were not adequately addressed. ATC and ITC do not follow best management practices. Did you ever consider that these corporations can (and do) misrepresent their practices to further their profit motive rather than furthering the public good?

The fact that there is no follow up and the USDA's only action is to ask the companies about their policies only points out how useless the Federal EIS is. It also points out the fact that the utilities and MISO are making vast amounts of money through capital investment by which they then control government agencies. This is the tail wagging the dog.

Lila Zastrow & Dave Hendrickson

[REDACTED]



David Reinhart <comments@cardinalhickorycreekeis.us>

comments on the Carinal Hickory Creek EIS.

1 message

Joy Zedler [REDACTED]

Tue, Nov 12, 2019 at 1:18 PM

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

Attached are comments on the Carinal Hickory Creek EIS.

 **FEIS ES atc Comments.pdf**
104K

General observations on the Rural Utilities Service’s Final Environmental Impact Statement Cardinal-Hickory Creek 345-kV Transmission Line Project

Dr. Joy Zedler, Aldo Leopold Professor Emerita of Restoration Ecology at UW-Madison.
November, 2019

The FEIS reads like a template. Wetlands are not given the unique attention they need to avoid negative impacts. BMPs are promised, but not reliably, because caveats indicate they will not be used when impractical. **In plain English, the FEIS says the project won’t cause significant negative impacts except when it will, and such impacts will be reduced except when they won’t.**

The FEIS concludes that the project would not affect wetlands, streams, and floodplains because disturbed areas would recover, despite a number of cumulative impacts to habitat and water resources, both during the project and during maintenance. Details are missing on how the project can avoid, mitigate or restore impacts of construction and maintenance. **Permanent structures will cause permanent damage.** Water quality in streams and wetlands will be impaired when vegetation is cleared and soils are disturbed and compacted or eroded during construction and maintenance. Sedimentation will have negative effects on streams and their rare fauna, e.g., mussels and fish. With more frequent and more damaging floods, the floodplains will become more vulnerable to erosion; wetlands will receive more sediment and nutrients, aggressive alien species will invade, and native biota will be diminished. The earth and its ecosystems are already impaired; constructing an unnecessary powerline **will not benefit Wisconsin’s natural resources.**

If this project is approved, ATC should be required to post a multi-million-dollar bond, so that local natural resources experts can monitor impacts indefinitely and implement compensatory measures to reduce damages—in perpetuity.

Shortcomings of the ES

Below, the quoted text is from Executive Summary pages ES 14-ES 16.
Bulleted text is by J. Zedler 10/18-19/2019

Wetlands

“Impacts to wetlands would be minimized by one or more of the following measures”

- Wetlands are too sensitive and their ecosystem services are too important for damages to be “minimized”; damage must be **avoided**.
- How could one ever be held accountable for not minimizing damages? The criteria are missing; this is not acceptable.

“Conducting construction activities when wetland soils and water are frozen or stable and vegetation is dormant.”

- What are the criteria for “stable”? Undefined terms are unacceptable.

“Use of equipment with low ground-pressure tires or tracks.”

“Placement of construction matting to help minimize soil and vegetation disturbances and distribute axle loads over a larger surface area, thereby reducing the bearing pressure on wetland soils.”

- If tussocks are present, this will only increase the area of damage; this is not acceptable.
- Sedge tussocks can increase wetland surface area by 40%; flattening them would decrease surface area by 40%.

“Access roads through wetlands will not require permanent fill.”

- Even temporary fill is irreversible in wetlands; surface soil and subsurface peat and highly organic substrates will be flattened, compressed, and irreversibly compacted. This is unacceptable.

“Erosion control BMPs will be installed where needed to prevent soil erosion into and within wetlands.”

- Installing BMPS is not adequate; maintenance and actual prevention of erosion is essential but rarely achieved; where are the bonds and penalties needed to make sure contractors fulfill the needs?

“Any spoils will be removed from wetlands to non-sensitive upland areas or other approved location.”

- How much impact of lost carbon sequestration will occur as a result of exposure, aeration and oxidation of organic soil?

“Cleaning of construction equipment and mats, per the Wisconsin Council on Forestry’s ‘Invasive Species Best Management Practices: Rights-of-Way’ guidance to mitigate the spread of invasive species (Appendix D). Where necessary to ameliorate minor impacts, such as rutting and vegetation disturbance due to equipment operation and mat placement in wetlands, site restoration activities will be implemented, monitored, and remedial measures applied until established restoration goals are achieved, as required by regulatory permits obtained for the C-HC Project.”

- How often will “cleaning” occur? BMPs say “standard inspection and disinfection procedures would be incorporated into construction methods,” but what is the level of effectiveness of these practices and do they work for herbaceous wetland vegetation? All it takes for Wisconsin’s worst wetland weed to establish is a viable seed or rhizome fragment or turion.
- For how long will restoration activities be “monitored”?
- Referring only to “remedial measures” is too vague.
- What assumptions about forests and wetlands are being made, i.e., why should forest practices suffice in wetlands?

Invasive Species

“The Utilities would follow the Wisconsin Council on Forestry’s ‘Invasive Species Best Management Practices: Rights-of-Way’ guidance to mitigate the spread of invasive species (see Appendix D).”

- There are no proven methods for preventing invasions or eliminating/eradicating invaders once established.

“Work below the ordinary high-water mark (OHWM) of waterways would be avoided to the extent practicable; the most likely activity would be withdrawing water to stabilize excavations.”

- Do those who decide whether avoidance would be “practicable” know about wetland value and sensitivity to disturbance?
- How would water extraction be done? With a tractor and coring device, pump, pipes, hoses, trampling, and no regard for what the ecosystem depends on?

“Before moving construction equipment and material between waterway construction locations where equipment or materials are placed below the OHWM of a waterway, standard inspection and disinfection procedures would be incorporated into construction methods as applicable (see WAC NR 329.04(5)).”

- What is the level of effectiveness of these standard practices and do they work for herbaceous wetland vegetation?

“All natural areas, such as wetlands, forests, and prairies, will be surveyed for invasive species following construction and site revegetation. If new infestations of invasive species due to construction of the C-HC Project are discovered, measures should be taken to control the infestation.”

- For how long will these areas be surveyed? How frequently?
- “Measures should be taken” is a weak suggestion that provides no certainty that any measures will actually be taken.
- Attempts to control infestations are usually futile for Wisconsin’s worst wetland weed, Reed canary grass.

“The WDNR or IDNR, as applicable, would be consulted to determine the best methods for control of encountered invasive species.”

- If the agencies are only “consulted,” who will implement these long term?

“The Utilities will employ a Certified Pesticide Applicator for all herbicide applications within the C-HC Project. The Certified Pesticide Applicators will only use herbicides registered and labeled by the USEPA and will follow all herbicide product label requirements. Herbicides approved for use in wetland and aquatic environments will be used in accordance with label requirements, as conditions warrant.”

- Adding herbicides is itself an impact; what are the known impacts and risks?

Wildlife, including Special Status Species

“In accordance with WDNR avoidance and minimization measures, reptile exclusion fencing would be....”

- Where are the data that show how well (or poorly) these measures work in wetlands?

Water Resources and Water Quality

“An erosion control plan, coordinated with the IDNR and WDNR, will be prepared once a route is ordered/approved, and BMPs would be employed near aquatic features (wetlands, streams, waterbodies) to minimize the potential for erosion and to prevent any sediments from entering the aquatic features.”

- Where are the data that show how well (or poorly) these measures work in wetlands?

“Erosion controls would be regularly inspected and maintained throughout the construction phase of a project until exposed soil has been adequately stabilized.”

- Where are the data that show how well (or poorly) these measures work in wetlands?

“Waterway crossings would require a temporary clear span bridge (TCSB) to avoid the necessity of driving construction equipment through streams. Each TCSB would consist of construction mats, steel I- beam frames, or other similar material placed above the OHWM on either side to span the stream bank. If there are waterways that are too wide to clear span, a temporary bridge with in-stream support would be designed and constructed.”

- Both approaches, bridges and mats, are too risky to protect wetlands.

“The use of TCSBs would be minimized where possible by accessing the ROW from either side of the stream or by using existing public crossings to the extent practical. The Utilities would work with private landowners to identify alternative access routes to further reduce the use of stream crossings, if possible.”

- “Reducing” and “mitigating” are imprecise ways of saying there will be uncertain damages; these are not acknowledged or avoided.

“For those streams that would not be crossed by construction vehicles and where stream-crossing permits have not been acquired, wire would be pulled across those waterways by boat, by helicopter, or by a person traversing across the waterway. Wire stringing activity may require that waterways be temporarily closed to navigation.”

- Still, the damage is uncertain and potentially irreparable.

“No structures would be located below the OHWM.”

- Will OHWM be guessed on site? Where are data?

“Any dewatering within the project area during construction would be discharged to a non-sensitive upland site to facilitate re-infiltration to the aquifer.”

- Explain the dewatering procedure, its locations, extent, duration and impacts!

“Nearby waterways could be used as a water source during project construction. The Utilities would attempt to avoid water withdrawals during spawning seasons. The Utilities would coordinate water withdrawals with the IDNR and WDNR.

- **Attempting** to avoid reproductive seasons of fish, birds, amphibians, and all threatened plants and animals is inadequate and unacceptable. Wetlands are too sensitive;; avoidance is indicated.