

Comment Guide

Shortcomings of Draft Fed. Environmental Impact Statement

THANK YOU to the several volunteer experts who combed through the more than 600 pg. Draft Federal Environmental Statement (DEIS) to identify some key area you may want to address in your written or oral comments. This very brief summary of those key points reflects the findings of the volunteer experts and does not necessarily represent the position of any of the opposition coalition partner groups or individuals.

Actual Draft EIS - <https://www.rd.usda.gov/publications/environmental-studies/impact-statements/cardinal-%E2%80%93-hickory-creek-transmission-line> It's lengthy! You may want to skim the Table of Contents following page ES-20 for areas of particular interest to you. **DEIS section numbers** are listed below at the beginning of each topic item.

COMMENTING SUGGESTION - Conclude your comments with a question. Ask **how** the final EIS will address your specific concern.

ENERGY ISSUES

DEIS Section # 1.4.1 - Increase Transfer Capability Enabling Additional Generation - The DEIS falsely **assumes** the Applicants have established an electrical need of power flow from Iowa to Wisconsin. The Applicants have not established that need.

How will the final Federal EIS address this lack of demonstrated need?

1.4.1 Increase Transfer Capability Enabling Additional Generation - The U.S. Energy Information Admin released national figures showing that from 2005 to 2017, about **50% of the CO2 emission reductions** associated with electricity generation came from energy efficiency, and lowering use of grid supplied power. The DEIS does not calculate CO2 reduction in comparison to alternative means of CO2 reduction.

How will the final Federal EIS address this missing evidence concerning CO2 reduction?

1.4.2.1 Energy Cost Savings - The applicants indicate that *IF* a 345 kV line were built, the *potential* net benefits to Wisconsin residential electric customers would average up to 6 cents per month. *Potential*, pennies per month of net savings **does not create a "need"** for Cardinal Hickory Creek.

How will the final Federal EIS compare the Project with the economic savings by use of energy efficiencies, low-voltage and non-transmission alternative options?

1.4.3 Address Reliability Issues on the Regional Bulk Transmission System - The DEIS fails to analyze how a range of alternative options could address potential **reliability** issues in the future as required by the WI PSC.

How will the final Federal EIS compare the reliability of alternative energy and efficiency options with the Project?

2.2.2 Non-Transmission, Lower Voltage, and Underground Alternatives - The DEIS considers each non-transmission alternative separately even though a combination of alternatives would likely be used.

How will the final Federal EIS evaluate **combinations** of non-transmission alternatives as compared to the Project?

2.2.2.3 Energy Efficiency - The DEIS does not compare the benefits of the Project with a combination of likely alternatives under modest, zero or negative load growth.

How will the final Federal EIS compare these benefits?

ENVIRONMENTAL & ECONOMIC ISSUES

3.1 General Project Setting

How will the Fed EIS address the critical habitats that are being protected in public trust lands and waterways across the region?

3.12.2.3.5 Property Values - Studies cited in the Fed EIS draft contradict local experience and realty expert, Kurt Kielisch's, work that demonstrates significant negative impact of transmission lines on home values.

How will the Fed EIS evaluate the impact on rural property, organic farm values and artisan businesses critical to the economy of the Driftless region?

3.3 Vegetation, including Wetlands and Special Status Plants

How will the Fed EIS adequately address the rare natural ecosystems that this line would cross like pine relicts, grasslands of dry and dry-mesic, sand and mesic tallgrass prairies and rare alqific talus slopes as well as the potential negative effects of introduction of native-threatening invasive plant species?

3.4 Wildlife, including Special Status Species

How will the Fed EIS address habitat degradation and fragmentation for many special status species and also mitigation and accountability for any disturbance of habitat? Species of concern include rare terrestrial snails, cool water trout species, numerous avian and bat species including raptors, songbirds and grassland birds plus the 40% of all avian species worldwide that migrate along the Mississippi River flyway each year. Eight species that are federally listed as endangered or threatened may occur in the CHC area. There are 11 pollinators and other insect species in the area that are on state lists, four state endangered fish species, six state threatened fish species, three state endangered mussel species and five state threatened mussel species, four state listed frog and turtle species, and five state listed snake species ALL within two miles of the CHC line.

3.10 Land Use, including Agriculture and Recreation

How will the Fed EIS evaluate Conservation Reserve Program (CRP) lands within the route?

How will the Fed EIS address the detrimental effects of the towers on trout stream access and the experience of anglers, bird watchers, public trust lands for hunting and general tourism/recreation?

3.11 Visual Quality and Aesthetics

How will the Fed EIS reevaluate and analyze homes and community property to address whether these areas will experience a “moderate visual impact” or a “major visual impact”?

3.11.2.3.2 Scenic Resources - The photographs of proposed routes with simulated towers in the landscape are intentionally masking the actual visual impact of the towers, e.g. there is never a person placed near the tower to show scale.

How will the Fed EIS create more virtual representations that accurately represent the visual impact and scale of the towers and lines?

3.12 Socioeconomics and Environmental Justice

How will the Fed EIS evaluate and address the economic value of conserved lands?

The ROW imposes certain regulations that prevent conservation practices from taking place including limited access, limits to prescribed burns, heavy herbicide use and fragmentation of habitat. How will the Fed EIS address lost conservation opportunities along the route?

Written or Oral Comments May be Submitted at these Public Meetings

March 13, 5:00 – 7:00pm – Dodger Bowl Banquet Hall at 318 King St. in Dodgeville, Wisconsin

March 14, 5:00 – 7:00pm – Deer Valley Lodge at 401 W. Industrial Dr. in Barneveld, Wisconsin

March 18, 5:00 – 7:00pm – Cassville Middle School at 715 E. Amelia St. in Cassville, Wisconsin

March 20, 5:00 – 7:00pm – Madison Marriott West at 1313 John Q. Hammons Dr. in Middleton, Wisconsin

Or Submit Written Comments by April 1, 2019

On Line comments@CardinalHickoryCreekEIS.us

By Mail

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For Full Text of experts' comments visit any of these coalition partners:

Driftless Area Land Conservancy – ProtectTheDriftless.com

Driftless Defenders – DriftlessDefenders.com

Western Dane Preservation Campaign - www.wdpc2020.com

Wisconsin Farmers Union – WisconsinFarmersUnion.com