



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

NOV 22 2019

REPLY TO THE ATTENTION OF: RM-19J

Lauren Cusick  
Rural Utilities Service Co-Project Manager

Dennis Rankin  
Rural Utilities Service Co-Project Manager  
United States Department of Agriculture, Rural Utilities Services  
1400 Independence Avenue SW, Room 2242  
Washington, DC 20250

**Re: Cardinal-Hickory Creek 345-kV Transmission Line Project Final Environmental Impact Statement, Dane County, Wisconsin, and Dubuque County, Iowa - CEQ No. 20190257**

Dear Ms. Cusick and Mr. Rankin:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act, the U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Department of Agriculture, Rural Utilities Services (RUS) Final Environmental Impact Statement (EIS) for the Cardinal-Hickory Creek 345-kV Transmission Line Project dated October 2019. As a cooperating agency, EPA has long been involved in this project, including reviewing and commenting on preliminary versions of the Draft EIS in 2018 and Final EIS in 2019.

Dairyland Power Cooperative, American Transmission Company LLC, and ITC Midwest LLC, together referred to as "the Utilities," propose to construct and own a new 345-kV transmission line between Dane County, Wisconsin, and Dubuque County, Iowa. The purpose is to improve reliability and reduce congestion on the regional bulk transmission system as well as expand access of the transmission system to additional resources, including lower-cost generation and renewable energy generation. The Draft EIS analyzed six alternatives, and a preferred alternative had not yet been designated. In the Final EIS, RUS identified Alternative 6 - South-North Crossover Corridor - as the Agency Preferred Alternative.

EPA's March 29, 2019 comment letter on the Draft EIS included comments pertaining to construction-related air impacts and mitigation of impacts to terrestrial resources. Our comments regarding air impacts and percentage of impacts to different resource types within a geographic area were adequately addressed. However, we recommend responses to two outstanding comments:

(1) Mitigation/restoration for impacts to plant communities that do not require a permit. The Final EIS states: "Vegetation removal could affect vegetation communities by changing community structure and composition and altering soil moisture or nutrient regimes. The degree of impact depends on the type and amount of vegetation affected, and, for short-term impacts, the rate at which vegetation would regenerate following construction." However, it does not address long-term impacts due to removal of upland forested vegetation and whether upland forested vegetation will be

re-planted. Therefore, EPA reiterates our comment on the Draft EIS and strongly recommends mitigation for upland tree loss using native species at a minimum ratio of 1:1. The Iowa and Wisconsin Departments of Natural Resources (DNR) can provide the Utilities with a list of suitable replacement species. EPA recommends RUS make this commitment in the Record of Decision.

(2) Non-native, invasive species (NNIS). Table ES-5 of the Final EIS, Environmental Commitments Common to All Action Alternatives, states: "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. The Wisconsin DNR or Iowa DNR, as applicable, would be consulted to determine the best methods for control of encountered invasive species." Appendix D of the Final EIS, Best Management Practices, includes provisions for managing invasive species encountered in uninfested natural areas within the Right of Way, following Wisconsin's Council on Forestry Standard Best Management Practices (BMPs). EPA strongly recommends that the Record of Decision provide for NNIS control applying BMPs (or other best methods identified by Wisconsin DNR or Iowa DNR) throughout the entire right of way, including natural areas regardless of whether they are already infested. Controls should cover both construction and post-construction periods.

We appreciate the opportunity to review this project. Please send us a copy of the Record of Decision when it is completed. If you have any questions, please contact me or Kathy Kowal of my staff at (312) 353-5206 or [kowal.kathleen@epa.gov](mailto:kowal.kathleen@epa.gov).

Sincerely,



Kenneth A. Westlake  
Deputy Director, Tribal and Multimedia Programs Office

cc: Tim Yager, U.S. Fish and Wildlife Service  
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