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December 2, 2016

**By Electronic Mail**

Sabrina Chandler, Refuge Manager  
Tim Yager, Assistant Refuge Manager  
U.S. Fish & Wildlife Service  
51 East 4<sup>th</sup> Street  
Winona, MN 55987

RE: Cardinal-Hickory Creek Transmission Line Project Alternative Crossing Analysis

Dear Ms. Chandler and Mr. Yager:

We are writing to support the major findings and conclusions reached in the Alternatives Crossing Analysis prepared on behalf of ITC Midwest, American Transmission Company, and Dairyland Power in April 2016. As representatives of Iowa's leading environmental and conservation organizations, we appreciate ITC Midwest's efforts to involve our organizations in the siting and routing process for the Cardinal-Hickory Creek transmission project (also known as MISO Multi-Value Project 5).

Iowa has an abundant wind energy resource and accessing this resource is a major option to reduce the use of fossil fuels, particularly coal, as a fuel source to generate electricity in Iowa and throughout the region. We recognize that utilizing Iowa's wind resource will require the development of high voltage transmission lines. We appreciate the substantial environmental benefits that wind energy offers and recognize that additional transmission lines will enable more wind and more of these benefits. We believe there must be a balance between the environmental benefits of wind generation and the environmental impacts of needed transmission lines.

With a proactive and inclusive planning, siting, routing, and mitigation process, we can achieve this balance. We appreciate ITC Midwest's willingness to engage with our organizations on siting, routing, and mitigation for new or expanded transmission lines in order to help achieve this balance. ITC Midwest has regularly sought input from our organizations on a number of transmission line proposals in Iowa, including Cardinal-Hickory Creek.

Regarding Cardinal-Hickory Creek, ITC Midwest provided a number of Iowa environmental and conservation organizations, including the four undersigned organizations, with study area maps highlighting identified potential crossing options for the Mississippi River as well as the relevant substations in Iowa and Wisconsin that must be connected by the transmission project. In addition to reviewing maps, our organizations had the opportunity to visit potential crossing locations in-person, submit written comments on siting and routing options to ITC Midwest, and meet with ITC Midwest staff on multiple occasions to discuss the project. The Alternatives Crossing Analysis (ACA) notes some of this involvement.

During this review process, many of our organizations indicated a preference for, or support for, the two identified crossing options near Cassville, Wisconsin. In the ACA, these are referred to as the Nelson-Dewey and Stoneman crossing options. Our support for these options recognized several benefits. These

benefits include the use of existing transmission right-of-way and infrastructure for the River crossing itself as well as the use of existing transmission right-of-way and infrastructure for significant stretches of the transmission line outside of the crossing but not available if other crossing locations were used.

We agree with the major conclusion of the ACA that the preferred crossing locations are the Nelson-Dewey and Stoneman options. We appreciate the thorough and detailed review that was involved in producing the ACA. We recognize that an expanded infrastructure project, such as this transmission line, in the Mississippi River National Wildlife Refuge is a serious undertaking. Given the thorough siting and routing analysis, the limited options for crossing outside of the Refuge, and the broader environmental benefits from expanded access to wind generation, we are supportive of the use of the Refuge for the Nelson-Dewey and Stoneman crossing options.

We understand that there will be additional opportunities to provide comment on the siting and routing of Cardinal-Hickory Creek to the USDA's Rural Utilities Service. We appreciate the U.S. Fish & Wildlife Service's involvement in this transmission project and wanted to highlight our support for the findings of the ACA at this stage. If there are questions about this letter, please feel free to follow up with Nathaniel Baer at the Iowa Environmental Council as a first point of contact at [baer@iaenvironment.org](mailto:baer@iaenvironment.org) or 319-321-8449 (cell). We look forward to the next steps in the process.

Sincerely,

Nathaniel Baer  
Iowa Environmental Council

Doug Harr  
Iowa Audubon

Stephanie Enloe  
Center for Rural Affairs

Lisa Hein  
Iowa Natural Heritage Foundation

cc: Angela Jordan, ITC Midwest (via e-mail)