

November 26, 2019

By Electronic Mail

SWCA Environmental Consultants
Attn: Cardinal-Hickory Creek EIS
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comments@CardinalHickoryCreekEIS.us

RE: Draft Compatibility Determination for the Cardinal-Hickory Creek Project

Dear SWCA Environmental Consultants and U.S. Fish & Wildlife Service:

We are writing to support the major findings and conclusions of the draft compatibility determination for the Cardinal-Hickory Creek Transmission Line Project (Project) to use a portion of the Upper Mississippi River National Wildlife and Fish Refuge (Refuge) for realignment of utility right-of-way.

We have evaluated the options for the Project to cross the Mississippi River since 2013, early in the siting and routing process. We are familiar with the major studies evaluating routing options and Mississippi River crossing options, including the Alternative Crossings Analysis, Macro-Corridor Study, and federal Final Environmental Impact Statement as well as routing studies filed with the Iowa Utilities Board and Public Service Commission of Wisconsin. We agree with the major outcome of each study, which finds that the use of existing transmission right-of-way through the Refuge to Cassville, Wisconsin is the preferable crossing option.

The specific route proposed through the Refuge would shift this existing right-of-way slightly and, so doing, would consolidate several land uses in a single area, including the Project, a service road, a ferry landing and parking lot, and a privately-owned agricultural field. This option is known as the Nelson-Dewey right-of-way or crossing, which we support. By consolidating these land uses and removing the utility right-of-way in a more naturalized area of the Refuge (Stoneman right-of-way), the Project can reduce habitat fragmentation and provide benefits to the Refuge. Use of existing transmission right-of-way to co-locate the Project also prevents introduction of a new transmission crossing in the Refuge or elsewhere over the River.

We appreciate that the draft compatibility determination recognizes these benefits and would allow the Project to move forward using the Nelson Dewey right-of-way. The determination states that, for example, "Restoration of the Stoneman right-of-way would result in reduced habitat fragmentation and restoration of larger contiguous blocks of habitat." *Draft Compatibility Determination* at 14. The determination further states that "Over the long-term (30 to 50 years), a net reduction in habitat fragmentation would occur on the floodplain of the Turkey River. A more contiguous array of habitats would exist on the floodplain as a result of realigning the right-of-way." *Id.*

The Project is critical to expanding the use of renewable energy in the Midwest region, which offers a range of important environmental and economic benefits. The relationship of the Project to renewable energy and many of the resulting benefits are identified in the Final Environmental Impact Statement, to which the draft compatibility determination is included as an appendix.

The route for the Project – including the use of the Refuge to cross the Mississippi River – has been studied exhaustively. We appreciate the work of the U.S. Fish & Wildlife Service to require and conduct a robust analysis of the impacts and benefits to the Refuge of this right-of-way, and we support the draft conclusion that the use is compatible. We encourage the U.S. Fish & Wildlife Service to issue a timely final compatibility determination that, consistent with the draft compatibility determination, supports use of the Refuge for the Nelson Dewey right-of-way realignment and allows the Project to proceed with this preferable crossing option for the River as part of the overall route.

Sincerely,



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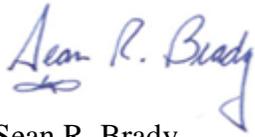
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