

To: United States Department of Agriculture Rural Utilities Service

From: Kerry Beheler Mount Horeb WI

RE: Beheler personal comments on the USDA Rural Utilities Service Draft Supplemental Environmental Assessment for the proposed Cardinal Hickory Creek high voltage transmission line

Date: 21 September 2023

The United States Department of Agriculture Rural Utilities Service (RUS) recently called for a 14 day public review of the draft Supplemental Environmental Assessment (SEA) document, "Proposals for Nine Route Modifications and Land Exchange". The Agencies provided defective notice in this case. Commenters couldn't access the draft SEA document online because the weblink provided in the newspaper notice did not work, and the public was not allowed to remove the hard copy of the SEA from the Dodgeville public library for 24 hours after it was posted.

In addition, the RUS's 14-day public comment period on this issue of significant public importance, controversy and public interest is unreasonably short for effective and meaningful public participation. I request a new notice, and an additional 30 days for public comments to be submitted in writing, and a public hearing for oral comments.

Three investor owned transmission companies plan to run the Cardinal Hickory Creek high voltage transmission line (CHC), with up to 20-story towers, through the Upper Mississippi River National Wildlife and Fish Refuge (Refuge). This plan is illegal. Running the huge CHC line through the protected Refuge violates the National Wildlife Refuge System Improvement Act, violates the U.S. Fish and Wildlife Service's own regulations, and is inconsistent with the U.S. Fish & Wildlife Service's own applicable Comprehensive Conservation Plan for this Refuge.

The Upper Mississippi River National Wildlife and Fish Refuge is an invaluable natural resource and a national scenic treasure. The Refuge provides important habitat for migratory birds, fish, and other wildlife, as well as many plant species. The Refuge has been designated as a Wetland of International Importance (The Ramsar List) and a Globally Important Bird Area.

The Refuge provides critical habitat for migratory birds, with over 150 species, including golden and bald eagles, passing through each spring. Songbirds, waterfowl, raptors, and other birds use the Refuge for breeding habitat. Fifteen colonial nesting rookeries in the Refuge are used by great-blue herons and great egrets. During fall, hundreds of thousands of waterfowl migrate along the Mississippi River. In winter, unfrozen pockets of water provide hunting grounds for large numbers of eagles. In addition to the ecological importance and function of the Refuge, it is also an important recreational

use area for hunting, fishing, canoeing, kayaking, boating, wildlife viewing, and camping.

I am incredibly concerned about the proposed construction of the CHC through the Refuge. The proposed line would have adverse environmental impacts, with significant bird mortality from collisions, habitat destruction, and damage throughout the ecosystem, including to mammals, birds, fish, insects, mussels, and vegetation. The proposed CHC would likely increase indirect mortality effects for all species. These indirect effects include the introduction of barriers to movement, habitat fragmentation, site avoidance or abandonment, disturbance, loss of population vigor, behavioral modification, creation of suboptimal or marginal habitats, loss of refugia, and intraspecific and interspecific competition for resources.

The sheer number of waterfowl that would be affected by the CHC is astounding. Many birds would die from collisions with the line. Mortality would be especially high for large bodied birds such as bald eagles, golden eagles, whooping cranes, sandhill cranes, trumpeter swans, and tundra swans, which migrate along the Mississippi River and are less agile than smaller bodied birds. The destruction will be irreversible. The destroyed resources are irreplaceable. I believe the increased noise and lighting of construction on the Refuge will negatively impact birds, including federally endangered and threatened species, during fall and spring migrations.

I am especially concerned about impacts to the whooping cranes that migrate through this area. Whooping cranes have been confirmed in 2023 in northeast Iowa, western Wisconsin, and central Wisconsin using wetland stopover habitat. This is a major issue that has been discounted by the state and federal agencies that have been reviewing the CHC project. Whooping cranes are a federally endangered species. There has been a huge amount of money, attention, and resources in Wisconsin put toward the recovering eastern whooping crane population. This eastern population is critically important because of its potential to become self-sustaining and grow through natural reproduction. Whooping cranes are very large birds and are not very maneuverable, making them especially vulnerable to collisions with transmission lines.

I am also very concerned about the dredge and fill activities of wetlands on the Refuge associated with the proposed CHC line crossing. There will be negative direct, indirect, and cumulative impacts with these activities, both temporary and permanent, especially on federally listed endangered and threatened species.

Dredge and fill activities in the Refuge wetlands will require the clearing of vegetation, impact the wetland function values, lead to soil compaction, and potentially introduce invasive species. Wetlands are relatively scarce in the Driftless Area. For that reason, the significance of wetland functional values is higher. Wetland function values include floristic integrity; human use values which includes natural scenic beauty, endangered and threatened species, cultural and other uses; wildlife and aquatic life habitat; floodplain and water quality functions; shoreline

anchoring; and groundwater processes. Dredge and fill activities in the Refuge wetlands will likely also lead to increased turbidity and sedimentation in the Mississippi River, including in areas that provide essential habitat for the federally endangered Higgin's eye mussel. Mussels are very sensitive to turbidity and sedimentation and increased sedimentation can harm or kill mussels. The ecological impacts will be far reaching, impacting the number and abundance of all wildlife species.

I adamantly oppose the CHC crossing through the Upper Mississippi River National Wildlife and Fish Refuge. The public comment period for this draft SEA ends 22 September 2023. This draft SEA relies on, but does not fix, any of the legal problems with the original federal environmental impact statement for the entire Cardinal Hickory Creek project. The RUS must rigorously explore and objectively evaluate all reasonable alternatives, including non-wires alternatives and alternative routes that won't cross the Refuge, but has failed to do so in its draft SEA. Sincerely, Kerry Beheler Mount Horeb Wisconsin