

April 1, 2019

SWCA Environmental Consultants
Attn: Cardinal-Hickory Creek EIS
200 Bursca Drive, Suite 207
Bridgeville, PA 15017

Via electronic mail to comments@CardinalHickoryCreekEIS.us

To the Rural Utilities Service and SWCA Environmental Consultants:

The Town of Springdale, Wisconsin, respectfully submits the following comments for your consideration regarding the draft environmental impact statement (EIS) prepared under your leadership for the proposed Cardinal-Hickory Creek Transmission Line Project.

Springdale is located in Dane County, Wisconsin, and would be directly affected by the preferred route. Considerable environmental assets exist within our town, and our residents have a strong collective commitment to preserving the rural character of Springdale. This rural character would be irreparably damaged by the proposed transmission line.

- 1. The Town of Springdale has a land use plan, adopted in March of 2002, that reflects the values and goals of our citizens and is intended to preserve the rural character of our town.**

Through consensus and compromise, the volunteer leadership and citizens of Springdale developed a land use plan that reflects our core values. This plan provides guidelines to the local town government from its citizens regarding how land use decisions should be made. The Springdale plan commission continues to make its land use decisions based on this document. *The most significant shared value we agreed on is that we wish to preserve the rural character of Springdale.*

We encourage you to appreciate the strong emotions that questions of land use engender in a rural municipality. A variety of perspectives on property rights and appropriate land use must be considered and accommodated. The development of our land use plan was a long and sometimes contentious process that involved thousands of volunteer hours, along with input from a great number of our citizens. Two drafts were disseminated, with public comments encouraged. During the eleven-month period from May 2001 to March 2002, the town conducted 10 information meetings, 30 citizen committee work sessions, three plan commission work sessions with the citizen committees, two public input sessions, and one public hearing.

When the Springdale land use plan went before the Dane County Board of Supervisors for approval, the plan was praised for its innovative approach and incorporation of

conservation subdivisions. A Dane County supervisor said, “In some ways, this (plan) may be the best plan that’s ever come to this board. This is one of the few land use plans in Dane County that will be enforced primarily by land division ordinance. And that’s innovative.”

The Springdale land use plan has these stated objectives, among others:

- To preserve the agricultural land, open spaces, and other natural resources of a rural town
- To respect environmentally sensitive areas and culturally significant sites
- And to prohibit large commercial development and industrial development.

The plan is a living document. During the 17 years since the plan was adopted, it has been reviewed every year, but never challenged.

2. The land use plan for the Town of Springdale includes specific provisions to protect the rural landscape.

- The land use plan contains provisions that prevent development on the highest points in our varied topography. For homes that require a certified survey map, the town asks that new homes be built so that they blend into the landscape as much as possible. Residential developments must be built off of farmland and in less obtrusive sites.
- Given our varied typography, characterized by rolling hills, forests, wetlands, and rich farmland, a 345 -kV transmission line would directly conflict with the town’s land use plan. A high-voltage line would be visible for miles from many vantage points—hardly blending in with the landscape as our land use plan requires of new structures.
- Previous environmental impact studies we have seen define “affected households” as those that are within either 150 feet or 300 feet of the proposed transmission line. We encourage you to consider the fact that the visual impact of transmission towers and lines extends significantly beyond that distance in environmentally rich, rural areas such as the town of Springdale, where our topography includes rolling hills, forests, wetlands, and rich farmland. Neither 150 feet nor 300 feet are adequate measures for capturing the impact on our visual landscape.

3. The land use plan for the town of Springdale has provisions that preserve and protect the unique and irreplaceable culturally significant sites found in the town.

- Culturally significant sites include—but are not limited to—the First Norwegian Church Cemetery and Monument to the early Norwegian settlers, and a century-old, historically significant farmhouse. The town also contains other archaeological and historic assets.

4. We are concerned about the impact of a 345-kV transmission line on the environmental assets within the Upper Sugar River Watershed, as well as the impact on agricultural producers.

- The Upper Sugar River Watershed, with a drainage area of approximately 170 square miles (109,404 acres) and 115 stream miles, is located in Dane County in southern Wisconsin. It is rich in resources, including fisheries, wildlife habitat (including rare and endangered species), native plant communities (many in decline), and recreational opportunities. The Upper Sugar River Watershed could be directly affected by the proposed transmission line.
- The Upper Sugar River Watershed Association (USRWA) is a grassroots organization that provides leadership for continuous resource improvement through strategic partnerships that benefit the watershed’s land, water, and people. In 2016, USRWA received funding from the Department of Agriculture, Trade, and Consumer Protection to form a farmer-led coalition focusing on water quality. The Upper Sugar River Producer Coalition is targeting the Headwaters Sugar River and West Branch Sugar River watersheds, which are both impaired due to excess phosphorus loading.

The mission of the coalition is to “...ensure the future of agriculture by being responsible stewards of the land and water quality in the Upper Sugar River Watershed.” The coalition plans to promote and incentivize conservation practices among agricultural producers, in order to address the problem of agricultural runoff and its impact on water quality in the Sugar River Watershed.

<http://usrwa.org/farmers/>

- The sandhill cranes have been observed to travel up and down the Sugar River valley daily, and this daily migration could bring the cranes directly into the path of the proposed transmission line. Possible destruction of the area’s sandhill crane population in collisions with lines should also be considered when evaluating the impact of the proposed transmission line on wildlife. This is a particular concern in the Sugar River valley, where the sandhill cranes are a visible and much-beloved part of the natural environment.
- Eagles also have been observed feeding in the Sugar River Valley in the winter months on a regular basis.

- In addition to sandhill cranes and eagles, the area provides habitat to a great many other species of wild birds. Migratory birds that travel through our town include ruby-throated hummingbirds, cedar waxwings, and several species of warblers. The presence of transmission lines presents a threat to this rich and varied bird population due to the impact of collisions with the lines.
- Construction of a transmission line may cause significant damage to the Sugar River wetlands, including the natural springs.
- Construction work is likely to introduce invasive species into the Sugar River wetlands.

5. We are concerned about the impact of the proposed transmission line on the Southwest Wisconsin Grassland and Stream Conservation Area, which is located immediately to the south of the proposed transmission line that runs through the town of Springdale.

<http://dnr.wi.gov/topic/lands/grasslands/swgrassland.html>
<http://swgsca.org/>

Southwestern Wisconsin has been recognized for many years as one of the best grassland conservation opportunities in the Upper Midwest. The area stands out for its distinctive combination of resources: exceptional populations of grassland birds, which are in serious decline across their range; many scattered remnants of the area's original prairie and savanna that once covered the region; concentrations of rare plants and animals, and spring-fed streams, all set within this expansive rural farming region of open fields, croplands, oak groves, and pastures. These disappearing habitats, bird populations, and varied natural assets merit protection and would be threatened by the proposed transmission line.

The Wisconsin Department of Natural Resources has joined with a diverse group of conservation partners, local governments, and landowners in southwestern Wisconsin to establish a habitat conservation area known as the Southwest Wisconsin Grassland and Stream Conservation Area (SWGSCA). The SWGSCA protects 12,000 acres, expanding on an existing grassland boundary for the federal Conservation Reserve Enhancement Program (CREP), a voluntary set-aside program aimed at buffering area streams.

SWGSCA is a partnership between local, state, federal, non-profit organizations, landowners, and individual citizens, all working together towards the common goal of sustaining functional grasslands, savannas, and stream habitats.

We also are concerned about the impact of the proposed transmission line on the Driftless Area of Wisconsin, so called because it was never touched by glaciers and, as a result, has no glacial deposits or “drift,” the silt, clay, sand, gravel and boulders left behind by glaciers. The unique driftless geology of this large area of south central and southwestern Wisconsin has created a varied and beautiful topography over tens of thousands of years.

The area is home to environmentally-significant cold-water trout streams and wetlands. Its forests, prairie remnants and grasslands provide habitat for a range of wildflowers and wildlife.

6. We are concerned about the impact of the proposed transmission line on the aesthetic appeal, popularity, and use of the Military Ridge State Trail.

- The 40-mile Military Ridge State Trail is one of southern Wisconsin's top tourist attractions, and is part of the Aldo Leopold Legacy Trail System. It also crosses the Ice Age National Scenic Trail. The trail passes by agricultural lands, woods, wetlands, and prairies. Several observation platforms are available adjacent to the trail for viewing wildlife, natural springs, and other natural features.
- The Military Ridge State Trail is used by more than 200,000 people per year (Wisconsin Department of Natural Resources, 2004). Every chamber of commerce along the trail, including Mount Horeb, features the trail prominently in literature for visitors. The Military Ridge State Trail also is featured in numerous recreational guide books and websites, and is widely recognized as a haven for recreational bicyclists. All of these mentions extol the trail for its environmental virtues.
- The economic impact of the Military Ridge State Trail on the stores, restaurants, lodging and other businesses along its path is likely to be considerable.
- The trail provides visitors with an opportunity to experience the rural landscape, including the asset-rich Sugar River Valley—an experience that will be forever altered by the presence of the 345-kV transmission line. We believe that the proposed power line would lessen the appeal of the Military Ridge State Trail as a destination. This, in turn, is likely to have a negative economic impact on the communities along the Trail, all of which serve Trail visitors with shopping, restaurants, lodging, and other services.

In summary, we believe that the proposed Cardinal-Hickory Creek Transmission Line would do irreversible damage to the environmental, economic, and culturally significant assets within the town of Springdale. This extraordinary collection of diverse assets should be preserved, for the benefit of our economy, our agricultural producers, our citizens, and the visitors who come here to appreciate the aesthetic beauty of rural lands.

Thank you for your consideration.

Sincerely,



/s/ Mike Fagan

Town of Springdale, Wisconsin
Mike Fagan, Chairman