United States Department of the Interior

National Park Service

Midwest Region
601 Riverfront Drive
Omaha Nebraska 68102-4226

L7619 (MWR-PCL/PC)

30 JUN 2009

ER-09/0572

Ms. Stephanie Strength, Environmental Protection Specialist
U.S. Department of Agriculture, Rural Utilities Service
Engineering and Environmental Staff
1400 Independence Avenue, SW., Stop 1571
Washington, D.C. 20250-1571

Dear Ms. Strength:

Thank you for the opportunity to comment on the Notice of Intent to prepare an Environmental Impact Statement (EIS) for the Dairyland Power Cooperative Cap X 2020 Hampton-Rochester-La Crosse Transmission Line project in Dakota, Goodhue, Wabasha, Winona, Houston, Olmsted, Rice, and Dodge Counties, Minnesota, and La Crosse, Trempealeau, and Buffalo Counties, Wisconsin (Project). The National Park Service (NPS) has reviewed the document and submits these comments to you as an indication of our thoughts regarding the Project.

F-002-001 In compliance with Section 5(d) of the National Wild and Scenic Rivers Act (16 USC 1271-1287), we have reviewed the information provided and have determined that the proposed Project would cross the Cannon River and the Mississippi River in Minnesota, at locations downstream from segments listed on the Nationwide Rivers Inventory (NRI). Notably, at the crossing location, the Cannon River is currently designated as part of the State of Minnesota's Wild and Scenic Rivers Program. Also, as proposed, the Project would cross the Black River (River), Wisconsin, within a listed segment in the vicinity of La Crosse, Wisconsin.

The NRI is a register of rivers that may be eligible for inclusion in the National Wild and Scenic River System (System). The intent of the NRI is to provide information to assist Agencies in making balanced decisions regarding the use of the nation's river resources and to prevent potential impacts to the values for which a river has been placed on the list. Rivers are listed on the NRI because of the degree to which they are free-flowing (without straightening, diversion, riprapping, or other modifications of the channel), for their exceptional water quality, and for one
F-002-002 or more outstanding remarkable values. The River at the crossing location has been listed on the NRI for its scenic, recreational, and geologic values. The River is an outstanding segment that

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F-002-001

Your comment has been noted. The criteria used to route the transmission line is described in the Macro Corridor Study which is available on the RUS website at: http://www.usda.gov/rus/water/ees/eis.htm. These criteria and routing process will be addressed in the Draft Environmental Impact Statement. The project is still in the development and planning stages and the utilities have not yet permitted a route for the transmission line.

The Draft Environmental Impact Statement will be available on the RUS website at: http://www.usda.gov/rus/water/ees/eis.htm. Comments on the Draft Environmental Impact Statement will be solicited after its publication.

F-002-002

Your comment has been noted. Potential impacts to the aesthetic quality of the areas surrounding the transmission line, to geology and soil resources caused by the transmission lines, and to recreational resources will be addressed in the Draft Environmental Impact Statement.

F-002-002 flows through western Wisconsin hill country until reaching its confluence with the Mississippi River. The segment is further characterized by little cultural intrusion, high sand banks, wooded shores, and occasional limestone bluffs.

A Presidential Directive and subsequent instructions issued by the Council on Environmental Quality (CEQ) require that each Federal Agency, as part of its normal planning and environmental review processes, take care to avoid or mitigate adverse effects on rivers identified in the NRI.

Further, all Agencies are required to consult with the NPS prior to taking actions that could effectively foreclose wild, scenic, or recreational status for rivers on the NRI. The CEQ procedures for interagency consultation to avoid or mitigate adverse effects on rivers in the NRI may be found at http://www.ncrc.nps.gov/programs/rtca/nri/index.html.

F-002-003 Although the Cannon and Mississippi Rivers are not listed on the NRI at the crossing locations, the NPS strongly encourages project planning that includes measures to avoid and mitigate adverse impacts to the free-flow, water quality, and values of rivers and their corresponding watersheds.

The recommendations listed below should be implemented at river crossings to make sure that activities associated with the Project do not preclude the River from potential inclusion into the System and to maintain or improve the quality of all rivers affected by the Project.

Recommendations:

F-002-004 All Project activities should remain within the right-of-way and the disturbed riparian area should be the minimum that is necessary for project completion.

F-002-005
- Project boundaries should be clearly delineated with fencing or other barrier within 120 feet of the River.

F-002-006
- Trees that will remain and are currently within or along the Project boundary should be protected from abrasion or root zone compaction from heavy equipment. This can be accomplished by delineating the drip lines of trees to avoid the operation of heavy equipment within the canopy of a tree or by using track equipment.

F-002-007
- Any trees that must be removed within 120 feet of the river, especially along the riverbank, should be cut flush to the ground to ensure that the rootwads continue to provide soil and bank stability. Only remove those trees that are absolutely necessary.

F-002-008
- Excessive woody debris including logs and limbs should be removed from the bank area and placed at least 120 feet from the top of bank. There should not be large brush piles immediately adjacent to the River.

F-002-009
- All disturbed areas should be reseeded and stabilized using a temporary, noninvasive cover crop (annual rye or similar) and a permanent seeding of native grasses, forbs, and shrubs.

F-002-010
- A riparian management plan should be developed and implemented to ensure that a vigorous riparian buffer is established along the River with a minimum width of 120 feet. Plant species should conform to the native communities in the area, but may be limited to

F-002-003

Your comment has been noted. The criteria used to route the transmission line is described in the Macro Corridor Study which is available on the RUS website at: http://www.usda.gov/rus/water/ees/eis.htm. These criteria and routing process will be addressed in the Draft Environmental Impact Statement. The project is still in the development and planning stages and the utilities have not yet permitted a route for the transmission line.

Potential mitigation measures for impacts to water quality will be addressed in the Draft Environmental Impact Statement.

F-002-004

Your comment has been noted. Potential impacts resulting from construction, operation, and maintenance of the transmission line in addition to best management practices and mitigation measures will be addressed in resource sections throughout the Draft Environmental Impact Statement.

F-002-005

Your comment has been noted. Please refer to comment response F-002-004.

F-002-006

Your comment has been noted. Please refer to comment response F-002-004.

F-002-007

Your comment has been noted. Please refer to comment response F-002-004.

woody plants that grow less than 20-30 feet (shrubs and small trees) in order to limit right-of-way maintenance.

F-002-011 • All equipment, materials, and construction debris should be removed from the site upon Project completion.

F-002-012 • Monitor and maintain appropriate erosion-control measures throughout the duration of the Project.

F-002-013 • No construction vehicles should operate within the banks of the River.

F-002-014 • All unnecessary equipment should be kept away from the riparian zone.

F-002-015 • If bank stabilization is necessary, natural materials and soil bioengineering techniques should be implemented in order to provide ecological benefits to the River.

We appreciate the opportunity to provide comments on the Notice of Intent to Prepare an EIS for the Project. If you have any questions or if we can be of any further assistance please contact Regional Rivers Coordinator Hector R. Santiago, National Park Service, Midwest Regional Office, Planning and Compliance, 601 Riverfront Drive, Omaha, Nebraska 68102-4226, telephone 402-661-1848.

Sincerely,

Stephen E. Adams
Acting Regional Director

cc:
Ms. Tammy Whittington
Chief, Environmental Quality Division
National Park Service
7333 West Jefferson Avenue
Lakewood, Colorado 80235

Mr. Michael T. Chezik, Regional Environmental Officer
Department of the Interior
Office of Environmental Policy and Compliance, Philadelphia Region
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106

F-002-008

Your comment has been noted. Please refer to comment response F-002-004.

F-002-009

Your comment has been noted. Please refer to comment response F-002-004.

F-002-010

Your comment has been noted. Potential impacts to vegetation and wetlands will be addressed in the Draft Environmental Impact Statement.

F-002-011

Your comment has been noted. Please refer to comment response F-002-004.

F-002-012

Your comment has been noted. Please refer to comment response F-002-004.

F-002-013

Your comment has been noted. Please refer to comment response F-002-004.

F-002-014

Your comment has been noted. Please refer to comment response F-002-004.

F-002-015

Your comment has been noted. Please refer to comment response F-002-004.