AGRICULTURAL IMPACT STATEMENT


DATCP File Photo

DATCP #4602

Mill Road to Granville Rebuild Project
Milwaukee, Waukesha, and Washington Counties
PSC Docket ID 137-CE-212

WISCONSIN DEPARTMENT OF AGRICULTURE, TRADE AND CONSUMER PROTECTION

PUBLISHED MARCH 27, 2025

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WISCONSIN DEPARTMENT OF AGRICULTURE, TRADE AND CONSUMER PROTECTION

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MISSION STATEMENT

Dear Reader,

Through the Agricultural Impact Statement ("AIS") program, agricultural operations have the opportunity to provide feedback, document impacts, and suggest alternative solutions when their agricultural lands are affected by an entity with the potential powers of eminent domain. The AIS program also provides affected agricultural landowners time to gather information to make well-informed decisions before a study begins. Lastly, the AIS program makes suggestions and recommendations to study initiators to promote study alternatives and management practices that would reduce potential impacts to agricultural lands and operations.

The AIS program also serves the needs of the study initiator by conducting the AIS analysis and publishing the statement within a timely manner as required by Wis. Stat. § 32.035. In addition, the AIS program provides a continuing presence throughout study development and oversight processes in order to support agricultural operations and the statewide priority to preserve prime farmland.

The Agricultural Impact Statement program and the WI Department of Agriculture, Trade and Consumer Protection are honored to provide this essential state service to the agricultural landowners and operators of the state.

Thank you,

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ACRONYMS

AEA	Agricultural Enterprise Area
AIN	Agricultural Impact Notification
AIS	Agricultural Impact Statement
CPCN	Certificate of Public Convenience and Necessity
CREP	Conservation Reserve and Enhancement Program
CRP	Conservation Reserve Program
DATCP	Department of Agriculture, Trade, and Consumer Protection
EA	Environmental Assessment
EIS	Environmental Impact Statement
FP	Farmland Preservation Program
FSA	Farm Service Agency
HVTL	High voltage transmission line
IAM	Independent Agricultural Monitor
IEM	Independent Environmental Monitor
kV	Kilovolt
MFL	Managed Forest Law
NEV	Neutral to Earth Voltage
PSC	Public Service Commission of Wisconsin
ROW	Right-of-Way
USDA	U.S. Department of Agriculture
WisDNR	Wisconsin Department of Natural Resources

TERMS

CIRCUIT	A continuous electrical path along which electricity can flow from a source, like a power plant, to where it is used, like a home. A typical transmission circuit consists of three phases, with each phase on a separate set of conductors.
CONDUCTOR	A wire composed of multiple aluminum strands wrapped around a steel core that together carry electricity. A transmission line is constructed with three conductors, one for each phase of the circuit generated by a power plant.
DOUBLE-CIRCUIT	Electric lines with two sets of three conductors, totaling six conductors on one structure. These two circuits are independent of one another.
DISTRIBUTION LINE	An interconnected group of lines and equipment for the delivery of low voltage electricity between the transmission network and end users (i.e. home/business)
GREENFIELD	An area of the project that has not been developed and/or does not have existing infrastructure from past projects
KILOVOLT (kV)	A unit of electricity equal to 1,000 volts.
LAYDOWN YARD	Temporary equipment staging and storage areas.
SINGLE-CIRCUIT	Electric lines with one set of three conductors.
TRANSMISSION LINE	An interconnected group of lines and equipment for transporting electric energy on a high voltage power line between power plants and substations.

SUMMARY OF AGRICULTURAL IMPACT STATEMENT

The Wisconsin Department of Agriculture, Trade and Consumer Protection (the Department) has prepared Agricultural Impact Statement (AIS) #4602 for the Mill Road – Granville Rebuild Project in Milwaukee, Waukesha, and Washington Counties, WI ("the Project") by American Transmission Company LLC and its corporate manager ATC Management, Inc. (Collectively, "ATC").

The Project plans to construct two new single circuit 138kV lines to connect with the new Mill Road Substation and the existing Tamarack and Butler Substations. Two route options for the double circuit 138 kilovolt (kV) lines are proposed as part of ATC's Certificate of Public Convenience and Necessity (CPCN) application filing with the Public Service Commission of Wisconsin (PSCW), however, only one of these routes will be ordered and constructed. The Project also plans to rebuild the existing 9911 345kV and 3444 138 kV lines and the eastern portion of Line 36341 as a dual circuit 345 kV line from the new Mill Rd Substation to the Granville Substation. A temporary 138kV bypass line will be constructed between the Mill Rd and Tamarack Substations to accommodate outage constraints during construction. See Appendix A, Figure 1 for a project map made by ATC. ATC hosts a website for the Project, which can be found here: https://www.atcllc.com/project/mill-road-granville/.

Only the common route within Waukesha County crosses agricultural land, with the potential to impact approximately 75 acres of agricultural lands and impact approximately 23 agricultural landowners. As such, this analysis is limited to the scope of agricultural impacts on or along the common route.

The Public Service Commission of Wisconsin (PSC) has authority over the Project and ATC must obtain a Certificate of Public Convenience and Necessity (CPCN) to obtain the right to proceed with the Project. Through the issuance of a CPCN, the PSC would select the project route and other project criteria ATC shall follow. On October 23, 2024, ATC has submitted a CPCN application (REF # 522125) for the Project to the PSC under PSC Docket ID: 137-CE-212 and is awaiting a ruling from the PSC. The Department will provide the PSC with AIS #4602 as evidence to aid in determining the outcome of the project initiators' CPCN application.

In accordance with Wis. Stat. §32.035(3), ATC has provided the Department with the necessary information and materials to conduct an AIS. The Department has also contacted the agricultural property owners and operators impacted by the alternative routes. In accordance with Wis. Stat. §32.035(4)(b), the Department has reviewed and analyzed ATC's materials and the comments

obtained by the Department from the affected agricultural property owners and operators to assess the agricultural impacts of the proposed project. Through the AIS analysis, the Department offers a set of recommendations and conclusions to the PSC, ATC and the agricultural landowners and operators to help mitigate current and future impacts on agricultural lands and agricultural operations along the selected route.

The set of recommendations are located within the AIS Recommendation Section beginning on page 9. The AIS analysis begins on page 5 with information on the project in Section 2. Information and conclusions on the agricultural setting of Waukesha County and impacted areas can be found in Section 3. The agricultural impacts of the project on the impacted land, landowners and operators can be found in Section 3. Appendices for AIS #4602 contain the following information: additional project figures and tables (Appendix A), information on the appraisal and compensation process (Appendix B), a copy of Wisconsin's agricultural impact statement statute (Appendix C), various additional sources of related information for agricultural landowners and operators (Appendix D) and a copy of the Department's agricultural monitoring form for transmission line projects.

If ATC deviates from the proposed route segments, alternatives or the selected sites, ATC shall re-notify the Department. The Department shall review the re-notification for new potential impacts to agricultural lands and may generate an addendum to this AIS, if warranted.

AGRICULTURAL IMPACT STATEMENT RECOMMENDATIONS

The Wisconsin Department of Agriculture, Trade and Consumer Protection (the Department) has reviewed and analyzed the materials provided by ATC and comments from the affected agricultural property owners and operators regarding the proposed Mill Road to Granville Transmission Project. Should the PSC approve the Project, the Department provides the following recommendations, in accordance with Wis. Stat. §32.035(4)(b), to the PSC, ATC and agricultural landowners and operators to help mitigate impacts on agricultural lands and agricultural operations.

Recommendations to the Public Service Commission

1) Should the PSC decide to require an Independent Environmental Monitor (IEM) for the Project, the IEM should be hired in consultation with the approval of the PSC, DATCP, and WisDNR and all reports generated by the IEM should be shared with the PSC, DATCP, and WisDNR.

Recommendations to ATC

1) The Department recommends ATC follow all the additional recommended mitigation efforts described in Section 5.5.1 through Section 5.5.17 to mitigate Project impacts to or regarding: topsoil, soil compaction, drainage, de-watering, irrigation, erosion, temporary access roads, managed forest lands, fencing, weed control, aerial application, construction debris, crop rotation & dairy operations, organic farms & other areas with certifications, biosecurity, stray voltage, and construction noise.

2) ATC should continue to monitor the Project ROW for soil erosion and maintain erosion control practices until there is sufficient vegetative growth in the ROW to mitigate soil erosion.

3) ATC should provide agricultural landowners and operators advanced notice of acquisition and construction schedules so agricultural activities can be adjusted accordingly.

4) ATC should provide landowners with direct phone numbers and email addresses to the Agricultural Specialist that ATC hires and to project contractors that are able to respond to a range of topics including but not limited to: environmental & agricultural impacts, land acquisition & ROW, project schedule, access limitations, compensation for release of lands from conservation programming and project complaints.

5) If there is adequate growing season for a crop to mature and be harvested after ATC has an interest in the impacted lands, but before construction along the Project corridor begins, ATC should allow the current agricultural operators to harvest a crop for that season to the extent possible or the ATC shall compensate the agricultural operators for crop damages.

6) ATC should consult with the affected agricultural landowners and operators to ensure any relocated, temporary or newly established agricultural land access points are located in areas that provide safe and efficient access to remnant agricultural properties.

7) ATC should provide appropriate compensation to all landowners with land enrolled in a conservation easement or farm program if the landowner must reimburse the administering agency for the land's removal or alteration. These conservation or farm programs could include, but are not limited to, Conservation Reserve Program (CRP), Conservation Reserve and Enhancement Program (CREP), Farmland Preservation Program (FP), or MFL.

8) ATC is advised to consult the applicable County Land Conservation Department on the existence of installed SWRM conservation practices within the Project area.

9) ATC should implement training for all construction supervisors, inspectors, and crews to ensure that they understand the steps needed to protect the integrity of agricultural lands and operations during project construction and restoration.

Recommendations to Agricultural Landowners and Operators

1) Agricultural landowners and operators should review Wis. Stat. §182.017 (i.e. the Landowner Bill of Rights) seen in Appendix C (V) to understand their rights prior to the start of easement negotiations.

2) Landowners should review the recommended mitigation efforts described in Section 5.5.1 through Section 5.5.17 to mitigate project impacts to or regarding: topsoil, soil compaction, drainage, de-watering, irrigation, erosion, temporary access roads, managed forest lands, fencing, weed control, aerial application, construction debris, crop rotation & dairy operations, organic farms & other areas with certifications, biosecurity, stray voltage, and construction noise.

3) The Department recommends that the landowners or farm operators with a CREP or CRP agreement consult with their local FSA contact and discuss the impacts of the proposed project to determine what information is necessary to share with the project initiator in order

to maintain compliance with CREP or CRP agreements, as well as to receive any necessary FSA authorizations or approvals.

4) The Department recommends that agricultural landowners work with ATC to discuss agricultural practices that may be impacted by the project and provide a list of and contact information for land operators, renters or tenants that ATC may reach out to for a complete understanding of these practices.

5) Landowners should consider potential implication of the proposed route to their MFL enrolled lands. Impacted landowners should reach out to their local DNR Tax Law Forestry Specialist and discuss the implication of the route to their MFL enrolled lands.

6) Agricultural landowners have the authority under Wis. Stat. § 182.017(7)(d)) to allow or deny herbicide applications within the ROW they own and agricultural landowners should provide written consent or written lack of consent to ATC regarding herbicide applications.

7) Landowners with conservation easements within the ROW should consult with the conservation program provider to determine if any effects will occur due to the land's alteration or removal from the contract. If the landowner is charged a fee for removing or altering the land within the conservation easement, the landowners should contact the ATC staff member, as designated by ATC, responsible for handling compensation for release of lands from conservation programs.

8) Landowners who are aware of any SWRM cost-shared practices on their farm within the proposed Project area should consult with the County Land Conservation Department to determine 1) the compatibility of the proposed ROW easement with the existing conservation practice and 2) if any effects will occur due to alteration of a practice during construction activities.

9) Landowners concerned about potential impacts to their agricultural land should keep records of the conditions of the ROW before, during, and after construction, including field moisture conditions, historic presence/absence of ponded water prior to the start of construction for post-construction comparisons, crop yield records and photographs taken every season.

10) Landowners should fully describe and discuss property improvements and agricultural operations with appraisers so the appropriate value of the affected property is established.

11) Prior to the start of construction, landowners should identify for ATC where construction activities may interfere with farm operations, farm building/facilities or farming infrastructure including but not limited to drain tiles, wells, watering systems, drainage ditches, drainage tile, culverts, fencing, farm access roads, or grain bins.

12) Affected farmland owners should inform the tenant agricultural operators if an easement has or will be obtained by the Project Initiators on the land the rent, regardless if by judicial offer or voluntary negotiation.

13) After construction is complete, landowners and ATC should monitor for drainage problems. If problems are observed that can be attributed to construction, the landowner and ATC should work together to develop a mutually agreeable solution.

AGRICULTURAL IMPACT STATEMENT

1. INTRODUCTION

The Wisconsin Department of Agriculture, Trade and Consumer Protection (the Department) has prepared Agricultural Impact Statement (AIS) #4602 in accordance with Wis. Stat. §32.035 for the proposed construction of a new 345-kV electric transmission line in Milwaukee, Waukesha, and Washington Counties by American Transmission Company LLC and its corporate manager ATC Management, Inc. (Collectively, "ATC"). The applicant is proposing to construct the Mill Road to Granville Rebuild Project ("the Project"). ATC plans to construct two new single circuit 138kV lines to connect with the new Mill Road Substation and the existing Tamarack and Butler Substations. Two route options for the double circuit 138kV lines are proposed as part of ATC's CPCN application filing with the PSCW, however, only one of these routes will be ordered and constructed (DATCP, 2024a; ATC, 2024). The Project also plans to rebuild the existing 9911 345kV and 3444 138 kV lines and the eastern portion of Line 36341 as a dual circuit 345 kV line from the new Mill Rd Substation to the Granville Substation. A temporary 138kV bypass line will be constructed between the Mill Rd and Tamarack Substations to accommodate outage constraints during construction (DATCP, 2024a; ATC, 2024). See Appendix A, Figure 1 for a project map made by ATC.

According to Wis. Stat. §32.035, the AIS is designed to be an informational and advisory document that describes and analyzes the potential effects of a proposed project on agricultural operations and agricultural resources, but it cannot stop a project. This analysis is limited to routes submitted by the project initiator within the AIN. The Department is required to prepare an AIS when the actual or potential exercise of eminent domain powers involves an acquisition of any interest in more than five acres of land from any agricultural operation. The term agricultural operation includes all owned and rented parcels of land, buildings, equipment, livestock, and personnel used by an individual, partnership, or corporation under single management to produce agricultural commodities.

The AIS reflects the general objectives of the Department in its recognition of the importance of conserving vital agricultural resources and maintaining a healthy rural economy. The Department is not involved in determining whether or not eminent domain powers will be used or the amount of compensation to be paid for the acquisition of any property.

ATC submitted a Certificate of Public Convenience and Necessity (CPCN) to the Public Service Commission of Wisconsin (PSC) (REF # 522125) to obtain approval to construct the Project (ATC, 2024a). The PSC has assigned the Project PSC Docket ID: 137-CE-212, which can be followed within the PSC Electronic Records Filing System. The PSC will analyze the need for the project and the potential environmental and community impacts in an Environmental Assessment (EA). In addition, the PSC will receive testimony and hold hearings to further assess the impacts of this project. Afterwards, the PSC will approve, modify, or deny ATC's proposed project. Construction on the project cannot begin before ATC receives a CPCN from the PSC, as well as permits and approvals from other regulatory entities.

As established under Wis. Stat. §32.035(4)(d), if ATC intends to actualize its powers of condemnation at any point during the project through a jurisdictional offer(s), ATC may not negotiate with an owner or make a jurisdictional offer until 30 days after the AIS has been published. If ATC deviates from the selected alternative or the selected sites, ATC shall re-notify the Department. The Department shall review the re-notification for new potential impacts to agricultural lands and may determine to generate an addendum to this AIS.

The full text of Wis. Stat. §32.035 is included in Appendix D. Additional references to statutes that govern eminent domain and condemnation processes and other sources of information are also included in Appendices B, E, and F.

2. PROJECT DESCRIPTION

2.1. Project Summary

ATC has provided the Department with an agricultural impact notification (AIN) and requested spatial materials for analysis for the proposed project (DATCP, 2024a). The AIN, requested materials from ATC, and ATC's CPCN application to the PSC, serve as the main reference documents for the Project. The proposed project route alternatives presented here do not represent the final project route, which requires PSC approval.

ATC is proposing to construct the Mill Road to Granville Rebuild Project, which would construct two new single circuit 138kV lines to connect with the new Mill Road Substation and the existing Tamarack and Butler Substations. The Project also plans to rebuild the existing 9911 345kV and

3444 138 kV lines and the eastern portion of Line 36341 as a dual circuit 345 kV line from the new Mill Rd Substation to the Granville Substation. Work would occur in Milwaukee, Waukesha, and Washington Counties (DATCP, 2024a; ATC, 2024).

As the acquisition of agricultural lands or property rights are a pre-requirement to conduct an AIS, this analysis will only analyze and evaluate the aspects of the Project that acquire ROW's from agricultural lands. The proposed Project will impact up to 23 agricultural landowners and approximately 77.2 acres of agricultural lands. A full list of the impacted acres for each agricultural landowner is provided Appendix A Table 1. The scope of the AIS is limited to agricultural impacts only, and as such, the analysis will cover only agricultural lands within the Project area, limiting the review of the analysis to parts of the common route within Waukesha County.

2.2. Public Service Commission of Wisconsin (PSC)

The PSC is an independent regulatory agency that regulates public electric, natural gas, water and sewer utilities in Wisconsin. Through PSC regulations, public utilities must obtain PSC approval before setting new utility rates and undertaking major construction projects, such as electric transmission lines or substations. Prior to gaining approval, PSC staff review the utilities application and prepare either an Environmental Impact Statement (EIS) or an Environmental Assessment (EA) to evaluate the need, alternatives, cost, and environmental and social impacts of the proposed project.

Approval from the PSC is obtained by the issuance of a CPCN or a Certificate of Authority (CA), both of which grant the utility the right to proceed with the project as described within the CPCN or CA. Issuance of a CPCN or CA is determined by a three-member PSC Commission. PSC Commissioners are full-time staff, appointed by the Governor, tasked with reviewing the project case file (documents, reports, testimony) and ultimately deciding whether to approve, modify, or deny a project. If the PSC determines that the project is needed and feasible, the utility must adhere to the PSC ruling and project alternatives/route selected by the Commission. PSC approval is not constrained by the utilities' "preferred" or "alternate" route designations mentioned within this AIS and the Commission may choose any combination of route segments described in the application.

ATC submitted an application for a CPCN for the Project to the PSC on October 23, 2024 under PSC Docket ID: 137-CE-212 (ATC, 2024). DATCP expects the PSC to utilize the information contained within this AIS, the EA, the CPCN application, and testimony from the public to determine the

degree of impacts each route alternative will have on the agricultural landscape and economy, prior to issuing a ruling.

2.3. Project Design, Purpose and Need

ATC is proposing to construct the Mill Road to Granville Rebuild Project, which aims to connect the Mill Rd Substation, Tamarack Substation, Granville Substation and Butler Substations, while using existing transmission lines and existing ROW to the degree possible (DATCP, 2024a; ATC, 2024). To do this, the Project proposes to construct new 345-kV electric transmission line and two new single circuit 138kV lines to connect with the new Mill Road Substation and the existing Tamarack and Butler Substations. The Project also plans to rebuild the existing 9911 345kV and 3444 138 kV lines and the eastern portion of Line 36341 as a dual circuit 345 kV line from the new Mill Rd Substation to the Granville Substation. Work would occur in Milwaukee, Waukesha, and Washington Counties (DATCP, 2024a; ATC, 2024). According to the CPCN (REF#: 522125), ATC has offered the PSC two different route alternatives: the proposed (will be interchangeably referred to in this report as the "preferred route") and alternate routes (ATC, 2024).

The Department reviewed the Project's CPCN (REF#: 522125) found it to contain information on the system alternative and the system alternative comparative analysis performed by ATC (ATC, 2024). Need for the Project arose as recent MISO (Midcontinent Independent System Operator) Transmission Expansion Plan (MTEP) noted overloaded transmission facilities in the area, which will be exacerbated by a new data center expected to come online in southeast Wisconsin by 2027 (ATC, 2024). In addition, the Project in this area has three primary need drivers: the Project is needed to meet North American Reliability Corporation (NERC) TPL Reliability Standards, the Project is needed to support various generator interconnections, and the Project is needed to respond to load interconnections.

2.3.1. Project Location

The proposed and alternative routes for the Project occur within Milwaukee, Waukesha, and Washington Counties, WI. The project scope includes building a new substation at Mill Rd (Village of Menominee Falls), and connecting the substation to the Tamarack Substation (Village of Menominee Falls), Granville Substation (City of Milwaukee) Butler Substation (City of Wauwatosa), and Arcadian Substation (Village of Germantown). See Table 1 for complete list of impacted municipalities.

Table 1: Municipalities proposed to be impacted by the project.

County	Municipality
Milwaukee	City of Milwaukee City of Wauwatosa
Waukesha	City of Brookfield City of New Berlin Village of Butler Village of Menomonee Falls Village of Lannon Town of Brookfield
Washington	Village of Germantown

2.3.2. Preferred and Alternate Routes

According to the AIN submitted to the Department (DATCP, 2024a) and the CPCN application (REF#: 522125) submitted to the PSC under Docket ID 137-CE-212 (ATC, 2024), this Project involves constructing a new Mill Road Substation in the Village of Menomonee Falls, as well as building new transmission line and modifying or rebuilding existing construction.

The common route accounts for a majority of the route, with two aspects of the project where the project deviates between the proposed and alternate route for the construction of the new 138 kV line. The proposed and alternate route split at the Tamarack substation, with the proposed route extending east and the alternate cutting south of the substation to follow Marcy Road to Silver Road before the routes form a common segment between Enterprise Drive and Lily Road to Silver Spring Road, before the routes separate once more between Silver Spring Road and south to the intersection of Silver Spring Road and south to the intersection of Silver Spring Drive and N. 118th Court. From that intersection, the routes split ones more, before reforming a common segment north of W. Hampton Avenue and extending into Butler Substation. ATC hosts a website for the project that includes an interactive map here: https://www.atcllc.com/project/mill-road-granville/.

The following is an excerpt of the CPCN application in which ATC describes the transmission lines set to be constructed or modified for Project (ATC, 2024):

- *Rebuilding approximately 7.5 miles of the existing 345 kV/138 kV lines as double-circuit 345 kV lines (W-42/W-43) between the Mill Rd Substation in the village of Menomonee Falls and the Granville Substation in the city of Milwaukee.*

- *Constructing approximately 1.5 miles of new 138 kV circuit (X-196) between the Mill Rd Substation and the Tamarack Substation in the village of Menomonee Falls.*
- *Constructing approximately 5.9 miles of new 138 kV circuit (X-197) between the Tamarack Substation in the village of Menomonee Falls and the Butler Substation in the city of Wauwatosa depending on the route chosen. Both proposed routes for this circuit will also be partially located in the city of Milwaukee. The Alternate Route for this circuit would also be partially located in the village of Butler. The length of the Proposed Route is approximately 5.7 miles, and the length of the Alternate Route is approximately 5.9 miles.*
- *Reconductoring approximately 4.5 miles of the existing the 138 kV circuit (2661) between the Mill Rd Substation in the village of Menomonee Falls and the Germantown Substation in the village of Germantown. This construction will also be partially located in the village of Lannon.*
- *Uprating approximately 8.5 miles of the 345 kV circuits (9911/L-CYP31) between the Arcadian Substation in the city of New Berlin and the Mill Rd Substation in the village of Menomonee Falls. There will also be some uprates on select spans in the town of Brookfield and city of Brookfield.*
- *Modifying the existing 138 kV circuit (36341) located between the Sussex Substation in the village of Sussex and the Tamarack Substation in the village of Menomonee Falls. The 138 kV circuit will be looped into the new Mill Rd Substation, and approximately one mile of the existing 138 kV circuit east of Mill Rd Substation will be removed.*
- *Modifying the existing 138 kV circuit (3443) located between the Tosa Substation in the city of Wauwatosa and the Granville Substation in the city of Milwaukee. The circuit will be sectionalized and looped into the modified Butler Substation.*
- *Modifying the existing 138 kV circuit (3453) located between the Butler Substation in the city of Wauwatosa and the Granville Substation in the city of Milwaukee. The 138 kV circuit will be modified outside the Butler Substation to accommodate the new substation configuration for both the Proposed and Alternate Routes.*
- *Modifying the existing 138 kV circuit (5051) located between the Bluemound Substation in the city of West Allis and the Butler Substation in the city of Wauwatosa. The 138 kV circuit will be modified outside the Butler Substation to accommodate the new substation configuration for both the Proposed and Alternate Routes.*

- *Modifying the existing 138 kV circuit (5061) located between the Tosa Substation and the Butler Substation in the city of Wauwatosa. The 138 kV circuit will be modified outside the Butler Substation to accommodate the new substation configuration for both the Proposed and Alternate Routes.*

2.3.3. Off-ROW Access Roads

According to the AIN and the CPCN application, sixty-nine off-ROW access routes have been identified throughout the Project area. Off-ROW access will consist of temporary matted access to be removed and restored upon Project completion (ATC, 2024). Access will otherwise occur entirely from within the proposed or existing ATC ROWs, unless the contractor can arrange for voluntary alternative access that minimizes cost, environmental impacts, or landowner impacts. A list of proposed access roads can be found in the PSC ERF docket as a series named Appendix A Figure 4 (Docket ID: 137-CE-212).

2.3.4. Laydown Yards

ATC has identified 11 construction laydown yards within 10 parcels for the Project. Laydown yard locations have been selected based on their proximity to the proposed routes (ATC, 2024). Preference was given to locations where either existing improved parking lots were present, or where active quarries and gravel pits had the necessary capacity to store equipment during various construction phases. These sites were selected with the intention that no further expansion or ground disturbances would be needed (ATC, 2024). The potential laydown yards for each route are listed within the CPCN application as Appendix A Figure 4, which can be found in the PSC docket (137-CE-212).

As none of the selected laydown yards are proposed to be on agricultural land, the AIS will not include further analysis of laydown yards. If additional staging areas or temporary workspaces are required, ATC will notify the PSC of these new construction locations and will submit the necessary information to the PSC prior to establishing any such areas in accordance with Wis. Admin. Code § PSC 111.71.

2.3.5. Project Routing and Siting

Within their CPCN application, ATC describes that part of the routing and siting process is identifying Project criteria that maximized the use of existing transmission lines in the Project area (ATC, 2024). The siting process generally consisted of:

1) Existing utility corridors
2) Highway and railroad corridors
3) Recreational trails, to the extent the facilities may be constructed below ground and that the facilities do not significantly impact environmentally sensitive areas.
4) New corridors

Possible transmission line routes were screened against several criteria, including those specified in Wis. Stat. § 196.491(3)(d). Route segments were screened using criteria including but not limited to the following, which are not listed in order of priority nor assigned weighted values:

- Location of existing linear infrastructure;
- Use of existing ROWs to minimize the need for additional facility ROW (corridor-sharing);
- Locations of cemeteries, schools, day care facilities, and hospitals;
- County and state road expansion plans;
- Community and landowner impacts;
- Ability to minimize impacts to environmental and natural resource features, including wetlands, waterways, and woodlands;
- Archeological, tribal, and historic resources;
- Location of airports and airstrips;
- Avoiding high-density residential areas;
- Conformance with existing and proposed land use patterns; and
- Design modifications or construction practices to overcome terrain or other physical challenges.

The above elements were evaluated for their presence in the Project area and their relative sensitivity to the construction, operation and maintenance of the new and rebuilt transmission circuits. These considerations were refined using collected data and engineering constraints. The ATC identified routes that used or followed existing ATC transmission lines to the extent deemed feasible.

Additional information on route alternatives and ATC's analysis can be found within Section 2.2.2 of ATC's CPCN application, under PSC Docket ID: 137-CE-212 (ATC, 2024).

2.3.6. Project Schedule

According to the AIN and the CPCN application, pending approval by the PSC and obtaining all state agency permits, the target Project in-service date is October 1, 2027. Project construction is scheduled to begin in February of 2026 and is expected to be in service by December of 2027. Restoration and herbicide application activities will extend through the end of the 2028 growing season.

Table 2: The anticipated project timeline for the proposed Project, pending approval by the PSC and obtaining all state permits (DATCP, 2024a ATC, 2024).

Project Activity	Preliminary Date
Submittal of PSCW CPCN Application	October 2024
PSC CPCN Approval and Order	December 2025
Start Construction	February 2026
Project In-Service	October 2027

2.4. Project Right-of-Way (ROW)

According to the AIN and the CPCN application, existing easements will be used for locations that are routed along existing corridors. Additional easements will be required in some of these existing corridors. The typical width of permanent ROW is between 100 and 210 ft, and the typical width of temporary ROW is posed to be 100 ft.

Additional information regarding existing ROWs, for example new ROW, partially overlapping existing transmission ROW, completely within existing ROW is provided in Appendix B, Tables 1 and 7 (Docket ID: 137-CE-212).

3. AGRICULTURAL SETTING

3.1. Farmland Preservation

Wisconsin's farmland preservation (FP) program provides local governments and landowners with tools to aid in protecting agricultural land for continued agricultural use and to promote activities that support the larger agricultural economy. Lands that are planned for farmland preservation by the county and included in a certified zoning district or located within an Agricultural Enterprise Area (AEA) are afforded land use protections intended to support agriculture and are eligible for the farmland preservation tax credit.

3.1.1. Farmland Preservation Planning

A review of the Department's FP program shows that no land within a certified FP plan would be affected by the project's proposed area.

No jurisdictions within the project's proposed area contain certified FP zoning.

3.1.2. Agricultural Enterprise Areas and Farmland Preservation Agreements

AEAs are community-led efforts to establish designated areas important to Wisconsin's agricultural future. This designation highlights the importance of the area for local agriculture and further supports local farmland preservation and agricultural development goals. Designation as an AEA also enables eligible landowners to enter into FP agreements. Through an FP agreement, a landowner agrees to voluntarily restrict the use of his/her land to agriculture for a minimum of ten years (or fifteen years if signed before December 8, 2023) in exchange for eligibility for the farmland preservation tax credit.

A review of the Department's AEA program shows that Waukesha, Washington and Milwaukee counties do not contain an AEA that is affected by the project's proposed routes.

Prior to 2009, owners of eligible farmland could sign 10 to 25-year FP agreements outside of AEA boundaries. There are no effective pre-2009 FP agreements located in the project's proposed area.

3.1.3. Managed Forest Law

The MFL program is a voluntary sustainable forestry program administered by WisDNR under subch. III of ch. NR 46. In exchange for reduced property taxes, eligible landowners commit to a 25-50 year sustainable forest management plan on their privately owned woodlands. Sustainable forestry practices such as harvesting mature timber according to sound forest management

practices, reforestation and afforestation of the land, are required in enrolled landowner's management plans. Potential enrollees must also show their parcel complies with size and density requirements under Wis. Stat. § 77.82(1)(a)2, which states that at least 80% of the parcel must be producing or capable of producing a minimum of 20 cubic feet of merchantable timber per acre per year. Land with buildings or improvements associated with buildings are not eligible for MFL. Exceptions such as utility ROWs are permitted such that the project and its ROW will not interfere with future or current MFL eligibility (WisDNR, 2017).

In order to analyze project impacts on MFL enrollments, the Department conducted a spatial analysis to determine total acres impacted on parcels enrolled in MFL as compared to their sizes, and therefore their MFL eligibility. This analysis indicated that the Project's proposed common route will impact approximately 0.80 acres of MFL enrolled land on one parcel, and that there are no parcels where the impacted acres are greater than 10% of the parcel's total, which would have suggested a potential that they no longer meet the 80% eligibility requirement to remain enrolled in the MFL program. This parcel's state ID is 133MNFV0062984. The Project's other proposed routes will not impact any MFL enrolled land.

The Department recommends that all landowners review potential implication of the proposed routes to their MFL enrolled lands. Impacted landowners should visit the WisDNR Forestry Assistance Locator website www.dnr.wi.gov/fal/ to find their local DNR Tax Law Forestry Specialist and discuss the implication of the routes to their MFL enrolled lands.

3.1.4. Purchase of Agricultural Conservation Easement Programs (PACE)

The 2009 - 2011 State of Wisconsin budget authorized the state Purchase of Agricultural Conservation Easement (PACE) Program under Wis. Stats. § 93.73, which is intended to provide matching funds to assist local governments and non-profits with the purchase of permanent agricultural conservation easements. The intent of the PACE program is to preserve agricultural land of significance at risk of development and to provide an additional layer of permanent protection to certified FP planned areas and designated AEAs. Post PACE acquisition, the partnering local entity and the Department co-hold the agricultural conservation easement voluntarily purchased from landowners. At the time of this analysis, the state's PACE Program is not currently funded or accepting new applications. However, the state holds 17 PACE easements.

A review of the Department's PACE Program shows the Project would not impact any state held PACE easements.

Counties and private non-governmental organization such as land trusts may also hold agricultural conservation easements. Based on a review of publicly available online resources, the Department found no publicly held easements that would be impacted by the Project (NCED, 2024).

3.2. Drainage Districts

Drainage districts are local governmental entities governed under Wis. Stat. Ch. 88 and organized under a county drainage board for the primary purpose of draining lands for agricultural use (DATCP, 2021). Landowners who benefit from drainage pay assessments to cover the cost to construct, maintain, and repairing the district's drains. According to the Department, approximately 190 active districts exist within 27 of Wisconsin's 72 counties.

A review of the Department's Drainage Program database indicates that no drainage districts will be directly impacted by the Project.

3.3. Conservation Programs

Voluntary conservation programs such as the USDA Conservation Reserve Enhancement Program (CREP) and the USDA Conservation Reserve Program (CRP) are financial incentive programs to help agricultural landowners meet their conservation goals. The USDA and the Department jointly administer the CREP program in Wisconsin.

3.3.1. Conservation Reserve Enhancement Program

CREP pays eligible agricultural landowners enrolled within the program to install filter strips along waterways or to return continually flooded fields to wetlands while leaving the remainder of the adjacent land in agricultural production. To be eligible for CREP payments, a recipient must have agricultural lands in crop production that are within 150 ft of a stream or water body or 1,000 ft from a grassland project area (DATCP, 2019).

CREP pays eligible agricultural landowners enrolled within the program to install filter strips along waterways or to return continually flooded fields to wetlands while leaving the remainder of the adjacent land in agricultural production. To be eligible for CREP payments, a recipient must have agricultural lands in crop production that are within 150 ft of a stream or water body or 1,000 ft from a grassland project area (DATCP, 2019).

A review of the Department's CREP program indicates that no CREP sites will be affected by proposed routes for the Project.

3.3.2. Conservation Reserve Program (CRP)

CRP is a land conservation program administered by the Farm Service Agency of the USDA. In exchange for a yearly rental payment, eligible agricultural landowners enrolled in the program agree to remove highly erodible land from agricultural production and plant resource-conserving plant species such as grasses or trees that will improve environmental health and quality (USDA, 2019). Eligible agricultural landowners must possess lands with the potential for long-term improvements to water quality, prevent soil erosion or establish beneficial wildlife habitats according to the USDA Environmental Benefits Index (USDA, 2019). CRP enrollment information is privileged to the USDA and CRP program participants. The Department is therefore unable to determine if any of the impacted agricultural parcels are enrolled within the CRP program, unless landowners voluntarily share this information with the Department.

While none of the 5 responses to the Department's pre-construction questionnaire indicated if their property was enrolled within CRP, there is still the potential for there to be CRP agreements to be impacted by the Project.

It is the responsibility of the landowner to maintain their CREP or CRP agreements, and they can work with the project initiator to maintain this compliance. The Department recommends that the landowners or farm operators with a CREP or CRP agreement consult with their local FSA contact and discuss the impacts of the proposed project to determine what information is necessary to share with the project initiator in order to maintain compliance with CREP or CRP agreements.

The Department advises ATC to:

- Work with landowners to identify effective CRP agreements prior to any construction or site disturbance activities
- Coordinate with the appropriate Wisconsin CRP contact regarding effective CRP contracts within the project area and coordinate with FSA regarding impact mitigation to CREP enrolled lands and/or potential contract (CRP-1) releases within 12 months of expected construction or site disturbance activities

3.3.3 Soil and Water Resource Management Grant Program (SWRM)

The state has a SWRM program with goals including: enhancing surface and groundwater protections, providing financial and technical assistance for locally led conservation and addressing soil and water resource concerns. Through the SWRM Program, the Department allocates funds to County Conservation Departments to facilitate landowner cost-share for installation of conservation

practices. When a cost-share contract is issued under Wis. Stat. §92.14, a landowner and or grant recipient agrees to install and maintain the conservation practice according to an operation and maintenance plan.

Landowners who are aware of any SWRM cost-shared practices on their farm within the proposed Project area should consult with their County Land Conservation Department to determine 1) the compatibility of the proposed ROW easement with the existing conservation practice and 2) if any effects will occur due to alteration of a practice during construction activities.

ATC is advised to consult the applicable County Land Conservation Department on the existence of installed SWRM conservation practices within the Project area. Practices that are not maintained in accordance with the terms of the contract operation and maintenance plan may be subject to repayment of cost-shared funds. If a landowner is required to repay any cost-share funds because a construction impact resulted in a violation of the SWRM contract, the landowners should contact the ATC staff member, as designated by ATC, responsible for handling compensation for release of lands from conservation programs. The landowner should be compensated for any termination of SWRM grant contract resulting from a construction impact.

4. AGRICULTURAL IMPACTS

In addition to being a key component of Wis. Stat. §32.035, documenting the agricultural impacts of a project provides the project initiator and the agricultural landowner the opportunity to better understand the project in its own right as well as learn how the project will impact agriculture. Furthermore, the documentation of agricultural impacts by agricultural landowners and operators creates the opportunity for discussion of alternatives that may reduce impacts to agricultural lands.

In order to promote the opportunity for alternatives, the Department has used information provided by ATC for this AIS and information gathered by the Department to analyze the potential agricultural impacts of the Project in Milwaukee, Waukesha, and Washington Counties, WI. The analysis of the agricultural impacts and conclusions drawn from the analysis form the basis of the Department's recommendations within the AIS Recommendation Section above.

Agricultural operations and future productivity may be affected during construction of the Project. Impacts to agricultural lands may include but are not limited to:

- Interference with farm operation access in the ROW and adjacent areas

- Alteration of surface and subsurface drainage systems
- Impacts to grazing areas, row crops or existing fencing
- Use of prohibited substances on farms that follow organic or other sustainable management practices

Following construction, some impacts may affect agricultural operations for years. These long term impacts may include but are not limited to:

- Yield reduction due to erosion, topsoil mixing and/or compaction
- Ponding from altered surface and subsurface drainage profiles
- Inadequate restoration resulting in alteration to original land contours

ATC has cited agricultural mitigation practices that can be found in section 7.4.4 of ATC's CPCN application (REF # 522125). Pending Project approval, ATC will coordinate and consult with each agricultural landowner to obtain detailed information about each agricultural operation including but not limited to: locations of farm infrastructure, livestock and crops, locations of drainage tiles, and landowner concerns. ATC will use agricultural landowner feedback to identify potential project impacts to each agricultural operation along the Project route and to the extent practicable, implement measures to mitigate impacts (ATC, 2024). Subsequent discussion includes agricultural acquisitions and recommended additional agricultural mitigation practices beyond what ATC cites within their CPCN.

4.1. Landowner Rights

Wisconsin Statute § 182.017, also referred to as the "Landowner Bill of Rights", describes the rights of landowners and the requirements the utility must adhere to, when a transmission line will be constructed on private property. The transmission line applicant and contractor operating on the applicants behalf must comply with all aspects of this statute, which covers the range of topics described below:

- Compensation
- Infrastructure Repair
- Soil Conservation & Erosion
- Debris Removal
- Landowner and Utility Liabilities
- Tree Harvesting and Tree Ownership
- Interference with television & radio reception
- Right-of-way Restriction

- Consent for Weed & Brush Control

The applicant may request landowners to waive some rights during the negotiation process, but landowners are not required to do so. The Landowner Bill of Rights is still applicable to condemned land. The Department recommends that each affected landowner review the Landowners Bill of Rights (see Appendix D, Section V) in its entirety prior to the start of easement negotiations.

4.2. Agricultural Land Acquisitions

In order to implement the proposed Project, ATC and ATC will affect approximately 75 acres of agricultural lands depending on the selected route and affect up to 23 agricultural landowners. ATC has determined the existing easements are insufficient to accommodate the proposed Project for reasons outlined in Section 2.4 above. Therefore, ATC plans to use a combination of temporary and permanent easements to obtain the necessary rights to construct the Project across all agricultural lands, regardless of a lands' current easement status (ATC, 2024). The Department analyzed impacts to agricultural land within the proposed new easements.

The Department attempted to contact all 23 agricultural landowners impacted by the Project (Appendix A, Table 1). The following section relays the feedback and comments received from stakeholders and agricultural landowners through the Department's efforts. The information obtained from these responses helped form the basis of the Department's analysis of agricultural impacts to specific agricultural landowners and agricultural landowners in general.

Agricultural tenant operators impacted by the Project may be eligible for a farm replacement payment from ATC in accordance with Wis. Stat. §32.19(4m)(b) if ATC exercises the powers of eminent domain through a jurisdictional offer to the agricultural property owner. A voluntary sale between ATC and an agricultural property owner, after a jurisdictional offer has been made, would not negate the potential for a farm replacement payment.

4.3. Summary of Landowner Concerns

In order to gather additional information about the project's impact to agricultural lands and farm operations, the Department mailed surveys, referred to as "pre-construction questionnaires", to agricultural landowners within the Project area who are proposed to have impacts on their agricultural land. In total, the Department mailed 23 surveys. Agricultural landowners were given

the opportunity to respond by mail or call the AIS program manager to give a verbal response. A total of 5 agricultural landowners responded, resulting in a response rate of 21.7%. Specific landowner concerns can be found in 4.3.1.

The majority of the respondents (3 of 5 respondents, or 60%) reported their agricultural operations consisted of cropland. Of the total respondents, 20% or 2 landowners cited that the impacted parcels also had homes and farm buildings on them. One respondent noted having all six of the land use types that the pre-questionnaire asked for: cropland, pasture, idle, house and farm buildings, managed woodlands and wetlands. That respondent also indicated having sheep/goats and horses.

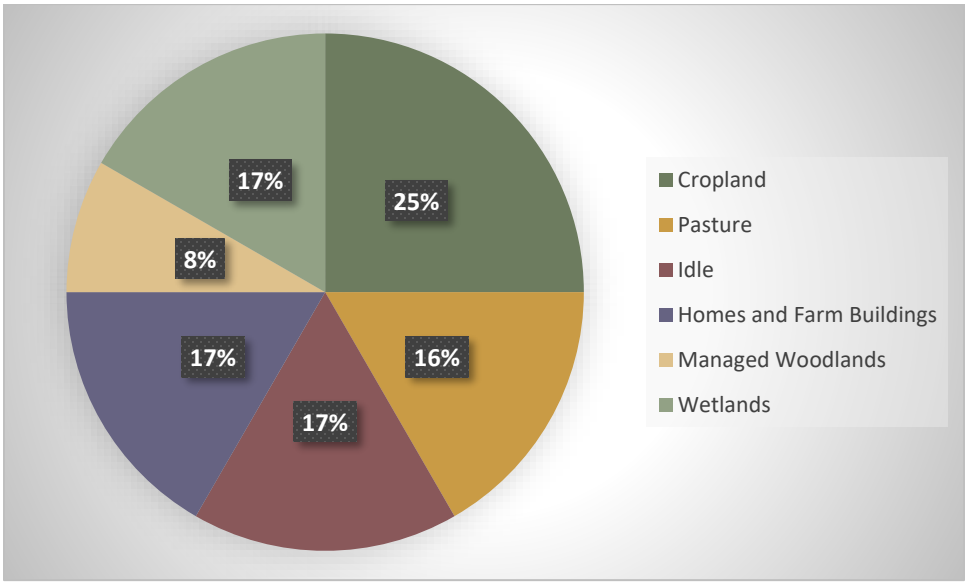

Figure 1: All land use types of impacted agricultural parcels as reported by pre-construction questionnaire respondents.

When asked to select any of the concerns shown in Figure 3 about the Project, the primary concern identified by respondents was drainage or drain tile (60% of respondents) (Figure 3). To mitigate impacts to drainage systems, agricultural landowners should provide ATC with locations of drainage structures and waterways; in-turn, ATC should provide additional considerations to preserve these structures, which are linked to the productivity of the impacted agricultural land. Please refer to Section 5.5.3 "Drainage" for additional information regarding drainage damage mitigation practices.

A multiple respondents were also concerned about impacts related to erosion control, grassed waterways, soil productivity and health, crop field, access, and firewood or timber (Figure 3). Other areas of concern reported by the respondents are shown in Figure 3. The Department recommends additional mitigation efforts to reduce as much potential impact as possible beyond what ATC cites for their standard practices. Please refer to Section 5.5 *Recommended Mitigation Efforts* for additional agricultural mitigation practices.

Agricultural landowners were also asked to indicate if they participated in any conservation or agricultural programming including FP agreements, FP zoning, CREP, CRP and MFL. None of the respondents indicated that they have land enrolled in FP agreements and/or FP zoning, MFL, CREP or in the CRP program.

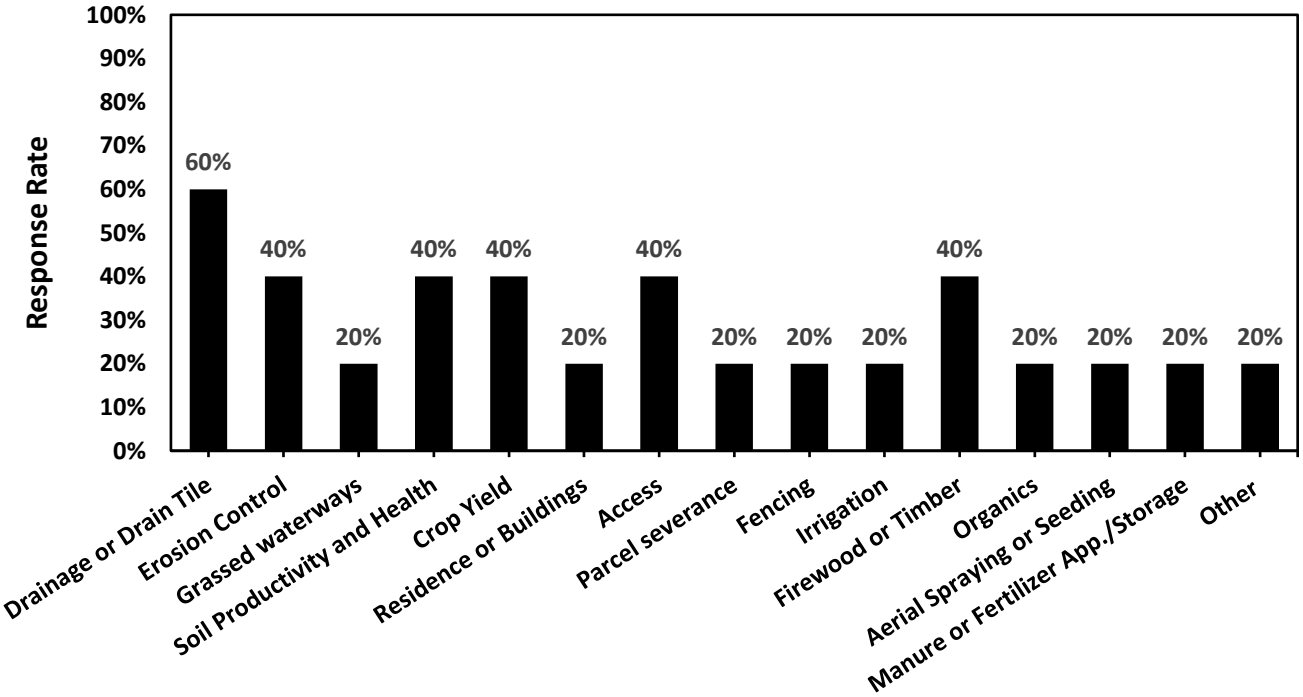

Figure 2: Landowner concerns resulting from the proposed Project.

4.3.1. Distinct Agricultural Landowner Concerns

Over the course of the survey, the following *agricultural operations* brought forward unique concerns warranting further evaluation by the Department. While other *agricultural operations* may

also have similar or different unique concerns, they were not disclosed to the Department during the survey. The Department also received responses from individuals not documented below, as they discussed general concerns already addressed in the overview in the previous section.

Timothy Winter – N84 W 19463 Menomonee Ave.

Timothy Winter owns 170 acres of land, with the vast majority being managed woodlands, pasture and rented cropland, as well as the land also containing residence/farm buildings. The pasture supports livestock such as sheep/goats and horses.

Winter has significant concerns in relation to potential agricultural issues of: drainage/drainage tiles, erosion control, grassed waterways, soil productivity and health, crop yield, residence/farm buildings, access, parcel severance, fencing, irrigation, firewood/lumber, organic certification, aerial spraying/seeding, manure/fertilizer application/storage, and loss of privacy on the property. In terms of drainage concerns, Winters is concerned that the Project would impact the Fox River waterway and drainage structures such as beaver ponds. For concerns regarding organic practices and cropland in general, the landowner is concerned about a 3-5 year loss of soil productivity.

Winter also manages a business on the land, known as The Promised Land Ranch and Preserve (https://www.thepromisedlandranchandpreserve.com/), and cites concerns that access to aspects of this organization and agricultural fields may be taken or damaged by the property. Winter also wrote concerns that their new area indoor riding stable and paddocks are within the project area. Winters also shares concerns that part of the managed forward that houses sugar maples tapped for sap would be impacted by the project. Winters is concerned that development of the project on the land would force the operation to relocate.

Juan Lozano - N674 W18056 Mill Rd

Juan Lozano operates 78 acres of land that serves as cropland, pasture, and contains home/farm buildings as well as 35 acres of wetlands. As well as also citing concerns over drainage impacts and soil compaction resulting from the project, Lozano cited a unique concern of recently planting several hundred trees along the property line to replace dead ash trees that parallel Mill Road, as well as there being a year-round creek that cuts perpendicularly to Mill Rd and that he is worried the project area could impact both. He is concerned that the project would meant the removal of

newly planted trees as well as the potential for the project to alter the creek flow, which could exacerbate drainage issues on the land further than the project may otherwise.

4.4. Severance, Access and Wasteland

The temporary and permanent easements of agricultural property required to implement any of the proposed Project alternative routes could result in agricultural parcel severance, removal of existing field access points and potentially the creation of wastelands and uneconomic remnant parcels. The circumstances (i.e. loss of access, severance, wasteland etc .) surrounding the impacts to each impacted remnant agricultural parcel are unique, thus some agricultural parcels may remain economically viable, while others may not. The following analysis will document the potential for severance, loss of access and potential creation of wastelands and uneconomic remnant parcels for the agricultural parcels impacted by the proposed alternatives for the proposed Project in Waukesha County, WI. While the project extent includes Milwaukee, Waukesha and Washington Counties, agricultural impacts are limited to Waukesha County.

4.4.1. Severance

As proposed, the common route may temporarily sever agricultural parcels in Waukesha County to accommodate the construction of the transmission line rebuild and upgrades. Severance may be a physical barrier such as a temporary access road or a non-physical barrier such as permanent land use restrictions. Imposing land use restrictions as part of a transmission line easement ROW may still allow an agricultural landowner to access lands. However, barring the growth of trees or other woody plants as part of an easement may prevent the continuation of an existing agricultural land use, such as managed forestlands.

Regardless of the means, severing an agricultural parcel effectively splits the existing parcel into two or more smaller parcels. Severing an agricultural parcel may also remove existing access points, create agricultural wastelands or uneconomic remnant parcels, and even divide the operation of a farm. Under Wisconsin's Eminent Domain Statute, compensation for damages resulting from severance is described in Wis. Stat. § 32.09(6).

ATC reported contiguous farming beneath the transmission will still be possible, but are subject to the limitations of ROW easements. In its AIN, ATC reported it attempts to apply engineering and design practices to site transmission structures near parcel edges to limit impacts to agricultural practices, and that the project is not projected to bisect farms (ATC, 2024). In the CPCN application (PSC REF#: 522125), ATC reported that 10 transmission structures are proposed to be

installed in agricultural fields along the common route while 0 structures are proposed within agricultural fields along the proposed or alternate routes. Landowners are encouraged to review Section 7.4.2, Agricultural Practices affected by Farming within and section 7.4.4, Mitigation of Construction Impacts: Agricultural Lands within the project CPCN application (PSC REF#: 522125) for specific details regarding mitigating or minimizing construction impacts in and around agricultural lands prior to easement negotiation and construction.

4.4.2. Access

As proposed, the Project has the potential to temporarily limit agricultural field access and limit access to agricultural operations during construction. When agricultural lands and operations lose access, even temporarily, agricultural productivity may be impacted if crops, livestock or agricultural products cannot be tended too. Lost access may also directly result in lost income if a field cannot be planted or harvested, or if an agricultural operation as a whole is hindered. Site-specific access limitations will be specific to temporary and permanent easements utilized for laydown yards, staging areas, off-ROW access roads and the transmission line ROW. Construction mitigation efforts for each farm will vary according to land use activities of the farm operator, type of farm operation, soil conditions, extent of construction activities on the parcel or farm operation, and feasibility to avoid areas of concern. Landowners and farm operators with concerns related to access on their farm operation should discuss them with ATC during easement negotiations and in subsequent communications.

4.4.3. Wasteland

Acquisitions and easements that impact farmland frequently create small remnant fields that may be difficult to access, are irregularly shaped, or are no longer able to produce the pre-existing agricultural crop (e.g timber). These small irregularly shaped remnant fields may also contain numerous obstacles, such as transmission line poles, that can make it difficult for agricultural equipment to navigate and reduce the amount of tillable acres. This in turn reduces agricultural productivity, decreases the economic viability of the land and increases the likelihood of creating undeveloped land (Wis. Stat. § 70.32(2)(a)(5)) or what is commonly referred to as wasteland as shown in Figure 4. Compensation for the reduction in the value of parcels that are small and/or irregularly shaped and the potential creation of uneconomic remnant parcels according to Wis. Stat. 32.06(3m) should be addressed in the appraisal of each affected parcel.

4.4.3.1. Wasteland

By the nature of transmission line projects, the siting of transmission structures within agricultural lands by ATC for the Project have the potential to permanently create small amounts of agricultural wastelands in the immediate area surrounding each transmission line structure (Figure 4). To mitigate the impacts of wasteland creation, the Department recommends that design practices be applied that prioritize edge of field siting for transmission structures in agricultural areas to minimize farmland conversion. ATC has indicated that detailed design and engineering efforts will be applied to attempt to site structures near edge of fields in a manner that is least impactful to agriculture (DATCP, 2024).

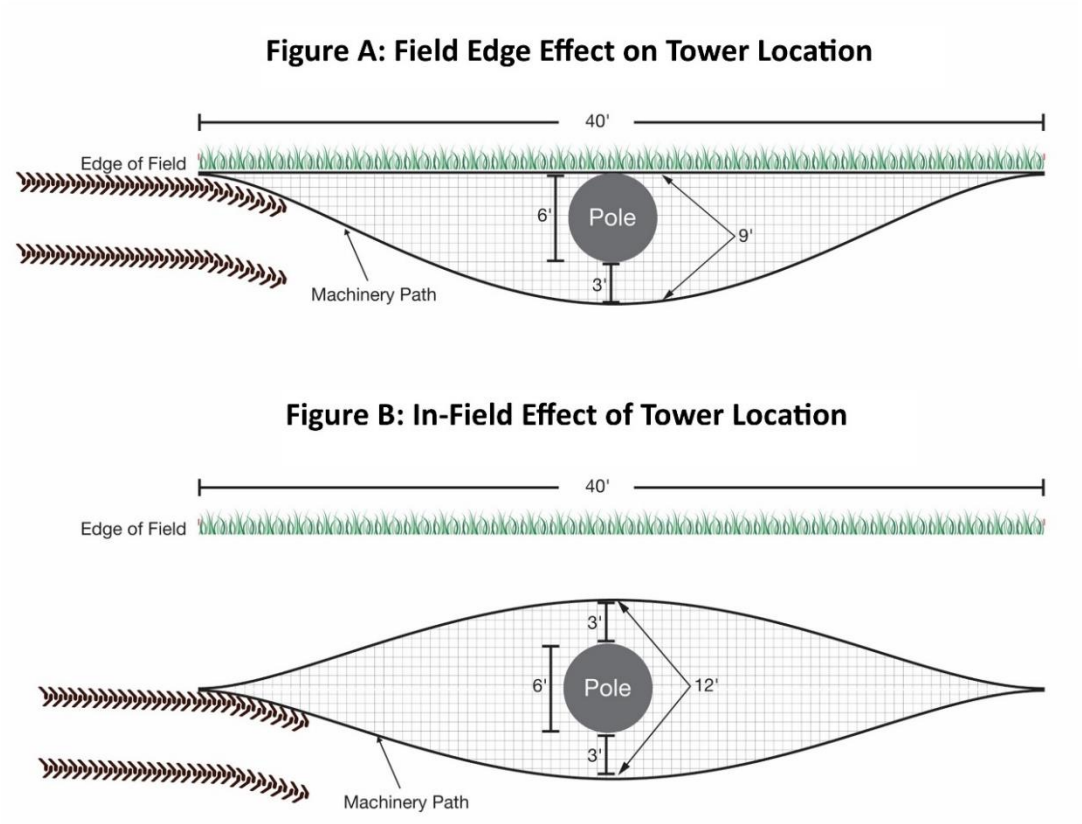

Figure 3 A and B: Examples of agricultural wastelands created by altering the pathway of agricultural machinery to navigate around transmission line towers along a field edge (Figure A) and within a field (Figure B).

4.4.3.2. Uneconomic Remnant Fields

Uneconomic remnant is defined in Wis. Stat. § 32.06(3m)(a) to mean "the property remaining after a partial taking of property, if the property remaining is of such size, shape, or condition as to be of little value or of substantially impaired economic viability". Under this provision, if the acquisition of only part of a property for the benefit of the project would leave the landowner with an uneconomic remnant, a condemnor shall offer to acquire the remnant concurrently. Landowners or operators who are concerned about the creation of a physical or financial remnant that is negligible in value as a result of acquisition of any permanent easement affecting their farm operation should share information regarding impaired use or lost income or value in consultations or easement negotiations with ATC.

4.5. Prime Farmland and Soils

In spatial data provided in the AIN, ATC reported the Project will impact up to 77.2 acres of agricultural lands along the common route, including cropland, idle or fallow fields and other agricultural land, and agricultural soils depending on the selected route. This soils analysis includes lands required for temporary staging areas or laydown yards or access outside of the Project ROW. Impacts to prime farmland and soils measured in this analysis reflect the Project's cumulative impact and does not necessarily differentiate between permanent or temporary impacts to an agricultural operation. The soils impacted by the proposed Project were cataloged and analyzed by farmland classification, for each route alternative, using the USDA-Natural Resources Conservation Service prime farmland soils GIS layer. Farmland soil classifications impacted by the Project include prime farmland, prime farmland if drained, farmland of statewide importance or farmland of local importance (Table 3). Prime farmland is designated by the USDA according to section 622.3 of the National Soil Survey Handbook (USDA, 2017) and is based on the ability of the land and soil to produce crops. Definitions of prime farmland, prime farmland if drained and farmlands of statewide/local importance are provided under Table 3. The soil texture of agricultural soils impacted by the Project was analyzed, in general terms, across the project ROW.

Table 3: Agricultural soils, shown by Project route and farmland classification, impacted by the proposed Project in Waukesha County, WI.

Soil Texture	Prime Farmland* (acre)	Prime Farmland if Drained◊ (acre)	Farmland of Statewide Importance₸ (acre)	Not Prime Farmland⌽ (acre)	Total (acre)
Common Route					
Gravel	0.0	0.0	0.0	1.5	1.5
Loam	0.0	0.0	4.3	0.8	5.1
Muck	0.0	0.0	7.5	0.0	7.5
Sandy Loam	0.0	0.0	0.0	0.7	0.7
Silt Loam	12.8	37.4	6.2	2.1	58.4
Silty Clay Loam	0.0	2.2	0.0	0.0	2.2
				Common Route	75.4

*__Prime farmland__ is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops, and may be utilized for cropland, pastureland, rangeland, forest land, or other lands excluding urban built-up land or water. It has the soil quality, growing season, and moisture supply needed to produce economically sustained high yields of crops when treated and managed according to acceptable farming methods, including water management.

◊**Prime farmland if drained**, indicates that if farmland is drained it would meet prime farmland criteria.

₸**Farmlands of statewide importance** are set by state agency(s). Generally, these farmlands are nearly prime farmland and economically produce high yields of crops when treated and managed according to acceptable farming methods. Some may produce yields high as prime farmlands under proper conditions.

⌽**Not Prime farmland**, indicates farmland is neither prime farmland nor of designated importance.

If constructed as proposed, analysis DATCP performed showed that the common route will impact approximately 75.4 acres of agricultural soils. Across impacted parcels in the common route, 93.3% hold some level of Federal or State priority designation, with 6.7% classed as not prime farmland. An estimated 49.2 acres of agricultural lands within the common route are known to be hydric or contain hydric inclusions. See Section 4.6 Drainage and Soil Health Impacts for additional discussion of hydric soils. Across the impacted agricultural parcels in both routes, the soils primarily consist of silt loam textured soils of various soil series. Silt loam soils are medium-textured soils (Cornell, 2017) with good soil structure, possess an ideal ability to hold onto water without becoming excessively wet and are usually well suited for crop production (UW-Extension, 2005). This soils analysis shows that the common route will impact or remove prime farmland and high quality soils.

4.6. Drainage and Soil Health

Maintaining proper field drainage and preserving soil health is vital to the success of an agricultural operation. If drainage is impaired, water can settle in fields and cause substantial damage, such as reducing soil health, harming or killing crops and other vegetation, concentrating mineral salts, flooding farm buildings, or causing hoof rot and other diseases that affect livestock. Soil structure, texture, organic matter and microorganisms are all important factors that influence soil health (Wolkowski and Lowery, 2008).

4.6.1. Drainage and Soil Health Impacts

Project construction activities have the potential to disrupt and/or mix soil profiles within the Project ROW as well as the surrounding area. Construction activities may affect the existing surface and subsurface (i.e. drain tile) drainage patterns of agricultural fields if drainage tile lines are broken or if the topography of grassed waterways, known water flowlines or erosion control structures are altered. Agricultural landowner feedback gathered by the Department indicates that at least several impacted agricultural parcels contain drainage tile that could be affected by the Project (see Section 4.3: Summary of Landowner Concerns). Analysis shows that 65% of the agricultural soils impacted by the proposed Project ROW are also widely known to be hydric or contain hydric inclusions.

Hydric soils are commonly saturated, flooded or ponded for an extended period during the growing season, causing anaerobic conditions within the upper soil layer and may be associated with wetlands. It is common practice for agricultural operations to install drainage systems to mitigate the impacts of hydric soils, drainage systems are most common in eastern and southern areas of the state where soils and topography preclude adequate drainage (Olson, 2020). Prior to the start of construction, landowners should identify for ATC where construction activities may interfere with farm operations, farm building/facilities or farming infrastructure including but not limited to drain tiles, wells, watering systems, drainage ditches, drainage tile, culverts, amongst others. The movement of heavy equipment through the Project ROW may also compact soil and impede drainage. UW-Extension report A3367 states that heavy equipment with axle loads that exceed 10 tons increase the risk of soil compaction into subsoil layers that cannot be removed by conventional tillage (Wolkowski and Lowery, 2008).

In addition, research has also shown that construction activities can negatively impact soil properties, soil health and crop yields for up to a decade within the ROW depending on the type and severity of construction impacts (e.g equipment axle weight, use of excavation, intermixing of

soil layer etc .) (Culley and DOW 1988; Shi et al., 2014). ATC has incorporated a Best Management Practice for identifying and repairing drain tile, compensation to producers for loss of productivity and decompaction where necessary in Section 7.4.4 of its CPCN Application (REF#: 522125).

ATC has discussed construction impacts related to soils and their applicable management practices in Section 5.5 of its CPCN Application (REF#: 522125) including practices like sediment and erosion control, use of composite or timber matting, topsoil segregation, clean up and restoration. Specific practices to minimize or mitigate construction impacts in and around agricultural lands are discussed in Sections 7.4.2 and 7.4.4 of the CPCN Application (REF#: 522125). The Department recommends ATC take several mitigation efforts related to topsoil mixing, soil compaction, drainage, de-watering, and erosion control as seen in Section 5.5 "Recommended Mitigation Efforts" to mitigate impacts to drainage and soil health on agricultural lands and preserve prime farmland & soils.

5. AGRICULTURAL IMPACT MITIGATION

ATC has indicated within their CPCN application and AIN, pending Project approval, that they will coordinate and consult with each agricultural landowner to obtain detailed information about each agricultural operation including but not limited to: locations of farm infrastructure, animals and crops, current farm biological security practices, locations of drainage tiles, and landowner concerns (DATCP, 2024a; ATC, 2024). ATC will use agricultural landowner feedback to identify potential project impacts to each agricultural operation along the Project route and to the extent practicable, implement measures to mitigate impacts. ATC will hire an Agricultural Specialist who will work with landowners for agricultural impact mitigation practices (DATCP, 2024a; ATC, 2024).

The Department recommends that landowners whom are concerned about potential impacts to their agricultural land should keep records of the conditions of the ROW before, during, and after construction. Records could include keeping crop yield records, beginning once the ROW is known, and photographs taken every season. These measures can help a landowner negotiate for compensation, should damages caused by Project occur.

5.1. Independent Environmental Monitor (IEM)

For large-scale utility projects, the requirement for project initiators (i.e. utilities) to hire an IEM has become a standard part of a PSC approval order. When hired, an IEM works on behalf of the PSC, WisDNR, the Department or other state regulatory agency as opposed to the utility. IEMs

monitor project construction activities and report on a wide range of environmental issues such as construction impacts to wetlands, waterways, protected species, archaeological sites, state and federal properties, and erosion control. The IEM is also responsible for reporting incidents and has the power to stop project work if construction activities would violate permits, approvals, PSC order conditions, or agreement with a state regulatory agency.

Should the PSC decide to require an IEM for the Project, the IEM should be hired in consultation with the approval of the PSC, DATCP, and WisDNR and all reports generated by the IEM should be shared with the PSC, DATCP, and WisDNR.

5.2. Independent Agricultural Monitor (IAM)

When a project affects a significant amount of agricultural land, an IAM may also need to be hired. IAMs monitor project construction activities and report on a wide range of agricultural issues including but not limited to construction impacts to soil health, soil erosion, crop damage, agricultural operations, irrigation and impacts to surface and subsurface drainage. Similar to an IEM, an IAM works on behalf of the PSC, WisDNR, the Department or other state regulatory agency as opposed to the utility. IAMs should also verify the project initiator is complying with any agricultural best management practices and agricultural conditions in the PSC order and any environmentally relevant construction documents approved by the PSC. While the duties of an IAM and IEM may sound similar, the IAM specializes in agricultural impacts and the IAM does not hold the power to stop the project.

Agricultural impacts from the Project may include but are not limited to crop damage, loss of access, soil compaction, mixing of topsoil, soil erosion, impacts to surface and subsurface drainage, impacts to irrigation systems and stray voltage. For assistance mitigating these potential agricultural impacts and working with agricultural landowners during the negotiations, construction and restoration phases of the Project, ATC plans to hire an experienced Agricultural Specialist.

Given that ATC has hired an experienced Agricultural Specialist, according to their CPCN application, to work with farmers through negotiations, construction and restoration, the Department believes the potential magnitude of environmental impacts do not constitute the need for an IAM. The Agricultural Specialist hired by ATC will have the ability to assist impacted agricultural landowners and help mitigate the potential agricultural impacts from the Project.

Should the PSC require an IAM for the Project, the Department recommends the IAM complete the Department's standard Agricultural Monitoring Form for Transmission Line Projects (ARM-LWR-543)

seen in Appendix F or equivalent. For the Department to maintain timely review of Project activities occurring on agricultural lands, the IAM should document daily observations of construction activities on agricultural land only. The IAM should send the Department an updated form weekly.

5.3. Agricultural Mitigation Measures

ATC proposes mitigation and best management practices in agricultural areas in Section 7.4 of their CPCN application narrative (REF# 522125), in which they expect agricultural impacts to be short term and limited to construction (ATC, 2024). Their mitigation measures mainly include compensation to producers for loss in productivity and restoring land to the extent practicable through decompaction and drain tile repair. ATC plans to consult each agricultural landowner for potential impacts regarding their farm operation and where practicable, use impact mitigation measures (ATC, 2024).

At the time of developing this AIS, ATC does not have an Agricultural Impact Mitigation plan. This Department offers the following section for best management practices and mitigation efforts that go beyond what was listed within ATC's CPCN application.

Prior to construction, ATC also proposes to consult with each agricultural landowner to understand their farm specific agricultural operation, including but not limited to: current agricultural practices, equipment, locations of farm infrastructure, animals and crops, current farm biological security practices, locations of drainage and irrigation structures, and landowner concerns.

Subsequent discussion includes agricultural acquisitions and recommended additional agricultural mitigation practices beyond what ATC has proposed within their CPCN application narrative.

5.4. Cleanup and Restoration

In accordance with Wis. Stat. § 182.017(7)(c), following the completion of construction activities, ATC will restore the area to preconstruction conditions to the extent feasible. In general, cleanup and restoration activities include the removal of construction mats, temporary clear span bridges, and any other material or debris (including stones and rocks) from the ROW. Stockpiled topsoils and subsoils removed during construction are returned, in the proper order, and graded to match the existing topography and slopes. All ruts and depressions are restored and new topsoil may be brought in where topsoil has been lost or seriously mixed with subsoils. Agricultural soils are also monitored for compaction and when required undergo decompaction efforts to return the soil

structure to its original condition. In areas where crops are not present--such as roadsides, pastures, old fields or upland woods--native seed mixes (or other appropriate seed mixes approved by the landowner) may be sown.

Under Wis. Stat. § 182.017(7)(c), if drainage tiles, fencing or other agricultural features are damaged during construction, ATC is responsible to repair and/or replace the damage feature. ATC is also responsible to pay for any crop damages caused by construction or maintenance of the transmission line. Within the AIN to the Department (DATCP, 2024a), ATC stated they will work with agricultural landowners to compensate them for crop damages, compaction, and potential future crop loss as a result of the Project in the following manner. ATC will work with landowners to compensate for crop damages, compaction, and potential future crop loss caused by Project work. Yield losses would be identified and agreed to in a Damage Report supplied by the landowner once construction commences (DATCP, 2024a).

ATC plans to use the USDA Custom Rate Guide as a guideline for crop damage payments and confirm yields via the National Agricultural Statistics Service web site. ATC plans to measure crop damages and impacted areas with the contractor using GPS measurements on impacted land. ATC notes that settling compaction claims will depend on if the farmer repairs compaction or if ATC's construction crew repairs the compaction. The ATC Agricultural Specialist will assist and coordinate with agricultural landowners to settle damage claims.

The Department recommends that ATC continue to monitor the ROW for soil erosion and maintain erosion control practices until there is sufficient vegetative growth in the ROW to mitigate soil erosion. Only after restoration activities are complete and vegetation has re-established within the ROW, should temporary restoration erosion control devices, not designed to be left in place, be removed.

5.5. Recommended Mitigation Efforts

5.5.1. Topsoil Mixing

Agricultural topsoil is an invaluable resource that should be preserved. Excavation activities required to create the structural foundations for electric transmission line poles have the potential to mix highly productive topsoil with underlying less productive and potentially rocky subsoils. Deep rutting also has the potential to intermix topsoil. If intermixing of topsoil occurs, the resulting soils are generally known to be less productive and in-turn reduce the agricultural productivity of the impacted area. When excavation is needed, ATC is required by Wis. Stat. § 182.017(7)(c) to segregate and stockpile topsoil from subsoil. As stated within their CPCN, ATC will store the topsoil and subsoil separately and provide topsoil replacement as appropriate (ATC 2024).

The Department recommends that ATC take the following additional steps to prevent the mixing of topsoil with subsoil layers within the Project ROW:

1) Do not spread mixed soils or segregated subsoils over cropland, pastures or other agricultural fields.
2) Prevent and monitor for erosion to keep topsoil segregated and within the ROW.
3) The Project Initiators should apply the mitigation techniques outlined in Section 5.5.2 "Soil Compaction".
4) If rutting occurs, allow sufficient time for the soil to dry before repairing the ruts.
5) If topsoil mixing occurs, remove the intermixed soil and replace with new topsoil.

5.5.2. Soil Compaction

Equipment used to construct electric transmission lines has the potential to compact soil and reduce soil productivity on the farmland traversed during construction. Soil compaction is widely known to have a range a potential negative impacts to the productivity of soil, including reduced crop productivity, reduced crop uptake of water and nutrients, restriction of plant rooting depth, decreased water infiltration and increased surface runoff.

Several factors influence whether soil becomes compacted. An important influence is soil moisture: the wetter the soil, the more likely it is to be compacted from traffic. The potential for compaction also depends on the soil texture. Coarser textured soils, like sand or sandy loam, are less likely to become compacted than are clay or silty clay loams. Finally, the axle weight of the construction

equipment affects compaction. UW-Extension report A3367 states that heavy equipment with axle loads that exceed 10 tons increase the risk of soil compaction into subsoil layers that cannot be removed by conventional tillage (Wolkowski and Lowery, 2008). The expected compaction depth increases as the axle load and soil moisture content increases.

As stated within the Project's CPCN, ATC plans to address compaction issues through decompaction if necessary (ATC, 2024).

The Department recommends taking the following additional steps to prevent soil compaction and rutting wherever possible. Measures to prevent soil compaction within the Project ROW include:

1) Using low-ground pressure and/or wide tracked equipment to reduce axel weight applied to soils.
2) The use of construction matting in wet areas, areas prone to rutting, or wetlands to spread out ground pressure.
3) When possible, conducting construction work during winter months when the ground is frozen.
4) Avoiding work in areas with recently saturated soils, unless using work mats to mitigate the potential for soil compaction.
5) If rutting occurs, allowing sufficient time for the soil to dry before repairing the ruts.

After construction is complete, the ROW will be compacted to some degree. The Department recommends measuring for soil compaction post-construction within the Project ROW and outside of the Project ROW with a penetrometer throughout the soil horizon and comparing the measurements. If soil measurements within the Project ROW are comparatively higher, this is an indication that compaction has occurred. In areas where soil compaction occurred, the Department recommends ATC take steps to de-compact the soils by conducting a sufficient amount of deep tillage (V-ripper, chisel plow, para plow or other depth appropriate tillage implement) within the ROW to help restore the soil structure to pre-construction productivity. Following decompaction, the soil should be measured again for signs of compaction to ensure proper decompaction has occurred throughout the topsoil and subsoil profile. The Department also recommends ATC monitor soil moisture conditions post-construction throughout the Project ROW for signs of standing water. Areas with standing water may also have experienced soil compaction and should be measure for compaction.

5.5.3. Drainage

Proper field drainage is vital to a successful farm operation. Construction of an electric transmission line can disrupt improvements such as drainage tiles, grassed waterways, and drainage ditches, which regulate the flow of water on farm fields. If drainage is impaired, water can settle in fields and cause substantial damage, such as killing crops and other vegetation, concentrating mineral salts, flooding farm buildings, or causing hoof rot and other diseases that affect livestock. Construction-caused soil compaction or damaged drain tiles can lead to ponded water where none existed prior to construction. If drain tiles are damaged, ATC is required by Wis. Stat. § 182.017(7)(c) to repair or replace the damage drain tile.

Within their CPCN application, ATC states that once they are made aware of the existence of specific agricultural practices such as drainage tiles, they will work with the landowner to avoid or minimize impacts to these practices or provide monetary compensation as appropriate. (ATC, 2024).

To help mitigate the potential for drainage impacts, the Department additionally recommends the following:

1) Agricultural landowners should inform ATC about the existence and location of drainage systems or planned drainage systems that could be affected by the Project.

2) Agricultural landowners should document field moisture conditions and the historic presence/absence of ponded water prior to the start of construction for post-construction comparisons.

3) ATC should consider using the techniques outlined in Section 5.5.2 "Soil Compaction" when crossing a known drain tile.

4) Where construction activities have created new wet areas, ATC should work with the landowner to determine the best means to return the agricultural land to pre-construction function.

5.5.4. De-watering

During excavation/auguring of the structure foundation for a transmission line pole, de-watering may be necessary. Improper de-watering can result in soil erosion, sedimentation and deposition of gravel, sand, or silt onto adjacent agricultural lands, and the inundation of crops. The discharge of these construction waters must be in compliance with current drainage laws, local ordinances, WisDNR permit conditions, and the provisions of the Clean Water Act. ATC is required by Wis. Stat.

§ 182.017(7)(c) to compensate the landowner for any damage to agricultural fields caused by construction de-watering activities.

In section 5.5.5 of ATC's CPCN application, they describe dewatering methods proposed to be used for excavation activities (ATC, 2024).

The Department recommends the following additional practices to mitigate the impacts of construction water discharge on agricultural lands:

1) ATC should identify prior to construction 1) excavation sites with low areas and/or hydric soils where de-watering is likely and 2) suitable upland areas for discharge.

2) Discharge locations should be well-vegetated areas with topography that will prevent the water from returning to the ROW, resist soil erosion, and allow for infiltration and settling of gravel and other unwanted sediments prior to entering a field, pasture, or waterbody.

3) ATC should consider using pre-filter bags or other filter devices, prior to discharge, in order to capture sediments, gravel and rocks.

4) Cropland, pasturelands and other agricultural areas selected for discharge should not be inundated for more than 24 hours, as longer durations could result in crop damage.

5) ATC should not directly discharge or allow construction waters from non-organic farms to enter an organic farming operation.

5.5.5. Irrigation

Electric transmission line construction activities and the placement of transmission line poles can interfere with the operation of linear or center pivot irrigation systems used to irrigate crops. Soil compaction from construction equipment may also impact or damage underground piping that supplies irrigation systems. Any interruption to irrigation systems cause by the Project can deprive crops from needed water and nutrients resulting in decrease crop yields.

Within their CPCN application, ATC states that once they are made aware of the existence of specific agricultural practices such as irrigation systems, they will work with the landowner to avoid or minimize impacts to these practices or provide monetary compensation as appropriate. (ATC, 2024).

The Department recommends the following additional practices to mitigate the impacts to irrigation systems:

1) Prior to construction, agricultural operations that use irrigation within or adjacent to the Project ROW should inform ATC of their irrigation system, how the Project may impact the system, irrigation schedules frequency of irrigation and weather conditions that may change the irrigation schedule.

2) ATC should consider using the techniques outlined in Section 5.5.2 "Soil Compaction" when crossing a known irrigation pipeline.

3) If the Project plans to disrupt an irrigation system, ATC should notify the landowner beforehand and establish a mutually acceptable amount of time that the system will be taken out-of-service.

4) If any part of an irrigation system is damage as a result of construction activities, ATC should pay for and repaired reported damages as soon as possible.

5) If an irrigation system needs to be reconfigured as a result of the Project, ATC should work with the irrigation operators to reconfigure the irrigation equipment where necessary and to compensate them for any portion of cropland where the irrigation system no longer operates.

5.5.6. Erosion and Conservation Practices

Electric transmission line construction activities and the placement of transmission line poles can destabilize existing erosion control practices such as diversion terraces, grassed or lined waterways, outlet ditches, water and sediment control basins, vegetated filter strips, etc. The destabilization of these erosion control practices have the potential to cause soil erosion within the ROW, but also from upland fields. During wet conditions the risk of soil erosion is increased, as exposed soils, especially areas with increased slope, may more easily erode and move downslope. Wind erosion may also be of concern if existing windbreaks are removed from the ROW, especially when soils are dry. If left unchecked, significant erosion can have an adverse effect on the long-term productivity of agricultural lands. ATC is required by Wis. Stat. § 182.017(7)(c) to restore existing erosion control practices such as diversion terraces, grassed or lined waterways, outlet ditches, water and sediment control basins, vegetated filter strips, etc. that are damaged by construction activities to pre-construction condition and function.

ATC will manage sediment and erosion control on farmed lands in compliance with DNR stormwater permit performance standards (DATCP, 2024a). The Department recommends the following additional practices to mitigate soil erosion within the Project ROW:

1) Once construction is complete, pending soil decompaction, impacted agricultural lands within the ROW should be returned to cropland or seeded with the appropriate seed mix.

2) ATC should inspect all temporary erosion controls structures on at least a weekly basis and after significant rain events throughout construction and restoration phases and undertake erosion control structure maintenance as required to prevent soil erosion within the ROW.

3) ATC should avoid impacting any existing permanent erosion control structure (e.g diversion terraces, grassed or lined waterways, outlet ditches, water and sediment control basins, vegetated filter strips, etc.) that's intended to prevent soil erosion from an upland agricultural area.

4) Should ATC disrupt an existing permanent erosion control structure, a temporary structure should be installed until the permanent erosion control is restored.

5.5.7. Temporary Access Roads

ATC has proposed to install temporary access roads as part of the Project, when an alternative access road does not exist, to allow personnel and construction equipment to access the Project corridor. When a temporary access road is constructed there is a range of potential negative effects to agricultural lands including the mixing of topsoil with subsoil & rocks, soil compaction, soil erosion, and interference with existing drainage & irrigation. New temporary access roads also have the potential to impact agricultural operations by severing cropland or pastures, limiting field access or limiting access to agricultural infrastructure & buildings. Any of these impacts can result in lost agricultural productivity whether from lost soil productivity, crop losses or the direct loss of agricultural revenue when access to agricultural infrastructure is limited. When the Project has completed, ATC is required by Wis. Stat. § 182.017(7)(c) to restore the land to its original condition, clear all debris and remove all stones and rocks associated with the access roads. However, if desired by the landowner and in consultation with ATC, temporary access roads may be left in place after construction.

The Department recommends the following to mitigate the impacts of access roads when they cross agricultural lands within the Project ROW:

1) ATC should consult with agricultural landowners before siting any temporary access roads.

2) ATC should strip and stockpile the topsoil for later re-use during restoration.

3) Access roads should also be designed to allow proper drainage and minimize soil erosion.

4) ATC should consider using the techniques outlined in Section 5.5.3 "Drainage" when siting an access road over drain tiles.

5.5.8. Managed Forest Law, Trees and other Woody Vegetation

If approved, the Project will impact one MFL agreement. An explanation of the state's MFL program and what that means for the woodlands enrolled within the program is provided in Section 0 "Managed Forest Law". Additional acres of unmanaged forest lands will also be impacted, but are beyond the scope of this AIS as unmanaged forest lands are not defined as an agricultural use according to Wis. Stat. § 91.01(2). Both managed and unmanaged woodlands can provide financial benefit to the landowner either directly through the sale of managed forest for timber, the sale of firewood, or the harvest of tree sap for sale. The removal of any trees from a property may also decrease the market value of the property.

Prior to the start of construction, ATC will remove all woody vegetation, trees and brush not already removed by the landowner from the full width of the Project ROW. Vegetation will be cut at or slightly above the ground surface using mechanized equipment or by hand. Tree stumps are generally left in place, except in areas where stump removal is necessary to facilitate the movement of construction vehicles, or required by the landowner. Once removed, trees are not permitted to regrow or be replanted in the Project ROW after construction is complete or while maintained by ATC. According to Wis. Stat. § 182.017(7)(e) affected landowners will maintain ownership of all trees removed by ATC during construction. ATC is also required to provide the landowner a reasonable amount of time, prior to construction, to harvest the trees on their own. Post construction and restoration, the deforested land could be used for farming so long as the intended crop or agricultural equipment does not interfere with transmission line facilities. ATC will manage and maintain deforested areas, including vegetation removal and management within the deforested ROW for those areas that landowners do not wish to crop or maintain.

The Department recommends the following to mitigate the impacts of tree and woody material removal from the Project ROW:

1) ATC should adjust the placement of transmission line poles to minimize the need for tree removal and prioritize the preservation of trees used for windbreaks.

2) ATC should compensate agricultural landowners for the construction of any additional structures that serve in the place of the harvested trees.

3) ATC should hire an appraiser who has experience and expertise in valuing trees.

4) Landowners who wish to obtain their own appraisal should also hire an appraiser who has experience and expertise in valuing trees.

5) Landowners who wish to farm within the deforested area should discuss tree stump removal with ATC during the easement negotiation process.

5.5.9. Fencing

The construction process may require fences that cross the Project ROW to be severed. According to Wis. Stat. § 182.017(7)(c), if ATC is required to cut or sever a fence they are required to install a temporary gate and repair all damages to fencing. Changes to existing fence lines can interfere with grazing activities, particularly for rotational grazing operations that depend on precise, scheduled grazing in particular areas.

To mitigate the impacts to fencing, the Department recommends the following additional recommendations:

1) Prior to construction, ATC should consult with agricultural landowners with grazing operations in and adjacent to the Project ROW and modify construction activities and timing to mitigate impacts to livestock.

2) ATC and agricultural landowners should agree on the appropriate measures to prevent livestock from entering the Project ROW.

3) ATC should develop a plan for livestock to access pastures adjacent to the Project ROW or otherwise compensate the landowner for the costs related to restricted grazing.

5.5.10. Weed Control

The Project may introduce noxious weeds or other invasive plants species into the Project ROW that compete with agricultural crops. Noxious weeds may also spread from parcel to parcel by construction equipment and project activities. Once weeds establish, they can interfere with agricultural harvesting equipment, attract unwanted insects, and require physical removal or chemical applications to remove.

Post construction and restoration, agricultural operations may resume normal agricultural cropping activities within the ROW so long as the crop or agricultural equipment do not interfere with transmission line facilities. After construction and during the operation of the line, ATC is required by Wis. Stat. § 182.017(7)(d) to control weeds and brush around the transmission line facilities.

However, ATC shall not use herbicide for weed and brush control without the express written consent of the landowner (Wis. Stat. § 182.017(7)(d)).

The Department recommends the following to control for and manage the spread of noxious weeds within the project ROW:

1) Agricultural landowners should state in writing whether they do or do not give ATC their consent for herbicide to be applied within the ROW they own.

2) ATC should clean construction equipment and materials prior to entering an area of certification.

3) ATC should clean all roadways (private, county, state etc.) of construction debris, dirt and rocks.

4) ATC should use tracking pads at frequently used access points.

5) Agricultural landowners and beekeepers should consider using the free online DriftWatch™ and BeeCheck™ registries, operated by FieldWatch™ to communicate areas containing specialty crops or beehives with pesticide applicators, in order to minimize the risk of accidental exposure. For more information on DriftWatch, please visit the DATCP DriftWatch website at the provided link or at https://wi.driftwatch.org/.

6) ATC and its contractors that are applying herbicide or pesticides should utilize the Department's Driftwatch™ online mapping tool to locate agricultural lands and operations that are susceptible to herbicide or pesticides. If the online mapping tool locates an agricultural operation on or near areas that will receive herbicide or pesticide applications, ATC should contact the operation to discuss the appropriate methods required to minimize the risk of accidental exposure.

5.5.11. Aerial Application of Seeds and Sprays

The location of an electric transmission line on cropland can restrict the aerial application of seeds and chemicals and can increase the danger of making aerial applications. In turn, agricultural pilots have to maneuver to avoid transmission lines, which may result in uneven, imprecise or missed aerial applications. When aerial applications are restricted or prevented agricultural produces may experience 1) increased weed growth and pest infestations that reduce crop yields, 2) increased cost and labor from land based application of seeds and chemical in non-applied areas.

To mitigate the potential for impacts to aerial application, the Department recommends the following:

1) Agricultural landowners inform ATC if they use aerial applications.
2) ATC and the impacted agricultural landowners work to determine the most effective techniques to minimize the impact to their aerial applications.
3) ATC install colored wire shielding near fields that utilize aerial applications.

5.5.12. Construction Debris

After construction is complete, there may be construction debris remaining on the field. If large pieces of debris or rocks are left in the field, agricultural machinery may be damaged when the landowner first works the land. ATC is required by Wis. Stat. § 182.017(7)(c) to clear all debris and remove all stones and rocks resulting from construction activity upon completion of construction. To that end, ATC shall also clear the ROW of signage, construction mat debris, litter, and spoil piles etc.

To mitigate the potential impact of construction debris, the Department recommends the following:

1) Should a landowner find construction debris remaining in the field after ATC has cleared the field, the landowner should contact ATC's Agricultural Specialist or equivalent contact, to report the debris prior to operating agricultural equipment in the field.
2) Should ATC remove an existing power line pole from within or immediately adjacent to cropland, ATC should remove the old structure at a minimum of four feet below the ground surface.
3) Should the ATC create a hole within croplands during the removal of any part of the existing transmission structure, the Department recommends that ATC would preserve each layer and then backfill in soil sequence to keep it to the original soil to the degree possible, dressing with topsoil as needed. If backfilling with gravel is determined to be necessary and if it is within or immediately adjacent to cropland, then the Department suggests backfilling with gravel to a minimum of four feet from the ground surface to ensure tillage equipment would not be impacted or spread gravel throughout the soil horizons, or the Project Initiators should the agricultural operator for an appropriate depth depending on how deep their tillage equipment runs

5.5.13. Crop Rotation and Dairy Operations

The construction of an electric transmission line may disrupt a planned crop or crop rotation. Impacts to alfalfa fields and planned alfalfa seeding are especially disruptive to dairy operations as they need to maintain a proper supply of alfalfa to feed dairy cows. Any delays, yield reductions or damages to an alfalfa crop may require the dairy operation to buy haylage or hay, obtain more corn silage, and/or provide protein supplements such as soybean oil meal to make up for the lost alfalfa. With advanced notice of the Project's construction schedule, a dairy operator would be better able to adjust forage requirements and plan for any increased associated costs. If the Project is approved, the Department recommends that ATC provide any impacted dairy operations with advanced notice of the construction schedule across their operations and compensate the landowner for any increased costs associated with construction impacts to forage requirements.

5.5.14. Organic Farms & Other Areas with Certifications

Construction and ongoing maintenance activities for the Project may jeopardize a farm's organic certification or other certifications such as *pesticide-free* (certified areas) if a prohibited chemical is used on their certified land, drifts from a neighboring field or enters their land on construction machinery, construction matting or improper de-watering. ATC and their contractors must use caution and care where the Project ROW borders or crosses an area with certification. Wis. Admin. Code § ATCP 29.50(2) states that no pesticides (includes herbicides) may be used in a manner that results in pesticide overspray or significant pesticide drift. In addition, any oil or fuel spill on these farms could prevent or remove a farm's certification.

ATC addresses organic certified farm operations within section 7.4.2 of their CPCN application. ATC has reviewed the recommended BMPs below and shared in personal communication the additional BMPs they will follow (Julie Hanson, personal communication, March 21, 2025): in areas with organic or other certifications, be mindful of the following objects or activities are prohibited: the use of aerosol cans is prohibited; no refueling or lubrication without a barrier under the area; take steps to avoid erosion of non-organic soils onto organic lands. These additional restrictions will help avoid jeopardizing organic or other certifications for affected landowners. Additionally, in areas with organic or other certifications, ATC will work with the farm operator and maintain records of any seeds and seed tag records, fertilizer or soil used on those agricultural properties, and use only untreated lumber or blocking.

For identified organic farms, ATC will work with landowners to minimize potential impacts to their organic farming status from the Project, including:

- offsetting transmission line structures from the property line to maintain tree lines or buffers
- cleaning construction vehicles prior to entering organic farm parcels
- not applying herbicide within portions of an easement based on landowner guidance.

In the case of organic farms being identified within the project area, the Department recommends the use of all mentioned mitigation measures for organic farms within the CPCN, as well as the following additional practices:

1) Agricultural landowners with organic certification or other certifications should inform ATC of their certifications, provide documentation of certification and inform ATC of prohibited and/or limited activities and the range and type of substances that are and are not permitted according to their certifications.
2) Farm operators should consult with their certifying organization and work with ATC to ensure Project activities stay within compliance with organic certification restrictions.
3) Agricultural landowners and beekeepers should consider using the free online DriftWatch™ and BeeCheck™ registries, operated by FieldWatch™ to communicate areas containing specialty crops or beehives with pesticide applicators, in order to minimize the risk of accidental exposure. For more information on DriftWatch, please visit the WDATCP DriftWatch website at the provided link or at https://wi.driftwatch.org/.
4) ATC and its contractors that are applying herbicide or pesticides should utilize the Department's Driftwatch™ online mapping tool to locate agricultural lands and operations that are susceptible to herbicide or pesticides. If the online mapping tool locates an agricultural operation on or near areas that will receive herbicide or pesticide applications, ATC should contact the operation to discuss the appropriate methods required to minimize the risk of accidental exposure.
5) ATC should generate and distribute a list of organic farms or other certified farms and the prohibited chemicals to their construction staff and contractors. ATC reviewed this recommendation and added that they would post these signs with steel posts or untreated lumber (Julie Hanson, personal communication, March 21, 2025).
6) Prior to construction, ATC and the farms with areas of certification should agree to the appropriate methods to avoid unintentional contacts or applications of prohibited chemicals from entering their farms.

7) ATC may wish to underlay heavily used areas of the ROW with geotextile fabric in order to limit the potential for prohibited substances from contaminating areas with certification.

5.5.15. Biosecurity

Farm biosecurity is the implementation of measures designed to protect a farm operation from the entry and spread of diseases and pests. Construction activities can spread weeds, diseases, chemicals and genetically modified organisms (GMO's) that impact an agricultural operation. Certified organic farms and farms with other certifications such as pesticide-free are susceptible to the widest range of biosecurity impacts and may suffer greater negative impacts if their agricultural operation is exposed to a biosecurity threat. For more information on basic biosecurity protocols, please visit the Department's Basic Biosecurity website at the provided link or at https://datcp.wi.gov/Pages/Programs_Services/BasicBiosecurity.aspx.

The Department recommends the following to mitigate biosecurity risks within the Project ROW:

1) If a landowner or farm operator has a biosecurity plan or have required biosecurity protocols, this information should be shared with ATC for use during Project construction and restoration.

2) ATC and their contractors should avoid contact with livestock and manure throughout the Project.

3) If livestock need to be moved, ATC should work with the livestock owner to move the livestock.

5.5.16. Stray Voltage

Electric distribution systems are grounded to the earth to ensure safety and reliability. At the site of the grounding, electrical current enters the earth where voltage can be detected. This is generally known Neutral to Earth Voltage (NEV). When a person, animal or object is near an NEV, the voltage may pass to them resulting in electrical contact (i.e. shock); this is generally known as stray voltage. Stray voltage often goes unnoticed by humans, but stray voltage from NEV may affect animals on farms. Animals may encounter stray voltage any time the animal makes contact with an electrified point such as a fencing, feeder, the earth or stalls. Animals affected by stray voltage may show changes in behavior or milk production.

The PSC administers Wisconsin's Stray Voltage program under Wis. Stat. § 196.857 in cooperation with the Department. The PSC established the Phase II Stray Voltage Testing Protocol to fulfill its

duty to create a standard stray voltage NEV testing protocol as required by Wis. Stat. §196.857(b). Under the Phase II testing protocol, a utility is mandated to take corrective action to resolve any electrical contact at or above 0.5 volts (Reines and Cook, 1999). The Stray Voltage program is able to review voltage testing data generated by the utility and the conclusions the utility has reached. For more information on the PSC Stray Voltage program, impacts to agricultural operations and mitigation steps, visit https://psc.wi.gov/Pages/Programs/StrayVoltage HomePage.aspx.

Should additional concerns for the health of a herd arise from stray voltage testing, the Department's Herd-Based Diagnostic Program may be able to assist. The program provides a licensed veterinarian, free of charge, to help producers investigate concerns with milk production, milk quality, herd health, and more. For more information on the Herd-Based Diagnostic Program visit https://datcp.wi.gov/Pages/Herd-basedDiagnostics.aspx.

The Department recommends the following to mitigate the impact of stray voltage within the project ROW:

1) Confined animal feeding operations or any operation with livestock facilities within ½-mile of the proposed power line should request Phase II Stray Voltage Testing pre- and post-transmission line energization testing from their utility provider.

2) ATC should inform each landowner with livestock facilities within ½-mile of the Project ROW of their ability to request Phase II Stray Voltage Testing from their local utility provider. ATC should be responsible for costs associated with Phase II Stray Voltage Testing within ½-mile of the Project corridor.

3) As required by PSC guidance set forth under Wis. Stat. § 196.857, ATC shall take action to resolve electrical contacts at livestock feeding operations detected at or above 0.5 volts that are a result of the Project.

5.5.17. Construction Noise and Dust

During each phase of the Project, noise and dust is likely to be generated. Landowners near the Project ROW may experience noises and dust associated with construction techniques, movement of heavy equipment, and helicopters. This noise and dust may cause dairy, beef cattle and other grazing livestock to stampede, break through fences, and escape from the farm property. Fur animals, poultry and other confined livestock may also be impacted by these sounds.

Once construction activities are completed and mats have been removed, ATC will work with farm operators to develop a plan for dust and erosion control through cover crops or tillage practices

that provide a compatible segway into the next cropping operation (Julie Hanson, personal communication, March 21, 2025).

To mitigate impacts of noise and dust, the Department recommends the following:

1) Livestock owners & operators within the Project ROW whom are concerned about the noise potential for the Project should inform ATC or their representatives during the easement negotiation process.

2) Livestock owners & operators near the Project ROW who are concerned about the noise potential for the Project should inform ATC of their concerns prior to the project construction.

3) ATC should identify agricultural livestock operations with sensitive animals within and adjacent to the Project ROW and provide them appropriate advance warning of construction activities, including the use of helicopters, so they may take steps to safe guard their animals.

4) ATC should avoid loud and dusty construction activities in the early morning (before 7am) or evening (after 6pm) to the extent possible. If construction activities must occur outside of this time window, inform the agricultural operator ahead of time so they may take steps to safeguard their animals.

5) ATC should clean all roadways (private, county, state etc.) of debris, dirt and rocks caused by construction activities for the Project.

6) ATC should use tracking pads at frequently used access points.

7) When construction activities have the potential to generate substantial amounts of dust that could impact livestock or an agricultural operation, ATC should apply water over the dust generating areas to reduce dust output.

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ATC

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Agricultural Landowners

Mark & Deborah Gettelman

Timothy Winter

Juan Lozano

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