AGRICULTURAL IMPACT STATEMENT

DATCP #4625

Elm Road - Racine Transmission Project
Milwaukee and Racine Counties
PSC Docket ID 137-CE-215

WISCONSIN DEPARTMENT OF AGRICULTURE, TRADE AND CONSUMER PROTECTION

PUBLISHED FEBRUARY 5, 2026
REVISED APRIL 17, 2026

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Authors

Kirsten Biefeld
Agricultural Impact Statement Program Manager
Bureau of Land and Water Resources (DATCP)

Jennifer Chakravorty
Bureau of Land and Water Resources (DATCP)

Tim Jackson
Bureau of Land and Water Resources (DATCP)

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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
EPA	U.S. Environmental Protection Agency
FP	Farmland Preservation Program
FSA	Farm Service Agency
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
DNR	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.
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)
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) #4625 for the Elm Road – Racine Transmission Project ("the Project") in Racine County, WI by American Transmission Company LLC and its corporate manager ATC Management, Inc. (Collectively, "ATC").

The Project consists of creating a second 345 kilovolt (kV) line between the Elm Road Substation in Milwaukee County and the Racine Substation in Racine County. The south portion of Line 812 will be converted to 345 kV operation and approximately 3.7 miles of new 345 kV line will be built on new right-of-way (ROW), which will connect the converted portion of the existing Line 812 to the Elm Road Substation. The substation scope for the Project includes a new 345 kV breaker at Elm Road and new 345 kV breakers and buses to complete the ultimate three-run breaker-and-a-half configuration at the Racine Substation.

ATC has proposed two route alternatives for the Project, the Primary Route and Alternate Route (Figure 1). The Primary Route is comprised of segments C, D, E, F, G, and U and is ATC's preferred route. The Alternate Route is comprised of segments H, I, J, K, L, M, N and V. ATC additionally defines a Common Route where the Primary and Alternate routes overlap. The Common Route is comprised of segments A, B, O, P, Q, R, S, and T. Existing ROW within segments R, S and part of Q will not be reviewed in this AIS (refer to Figure 1; a full map of the Project that will be reviewed by the PSC is attached in Appendix A Figure 1). The length of the Project will be approximately 12.8-13 miles in length, depending on which route is selected. The Project proposes to impact between 73.2 – 79.1 acres of agricultural lands in new ROW and impact up to 42 agricultural landowners, depending on the selected alternative.

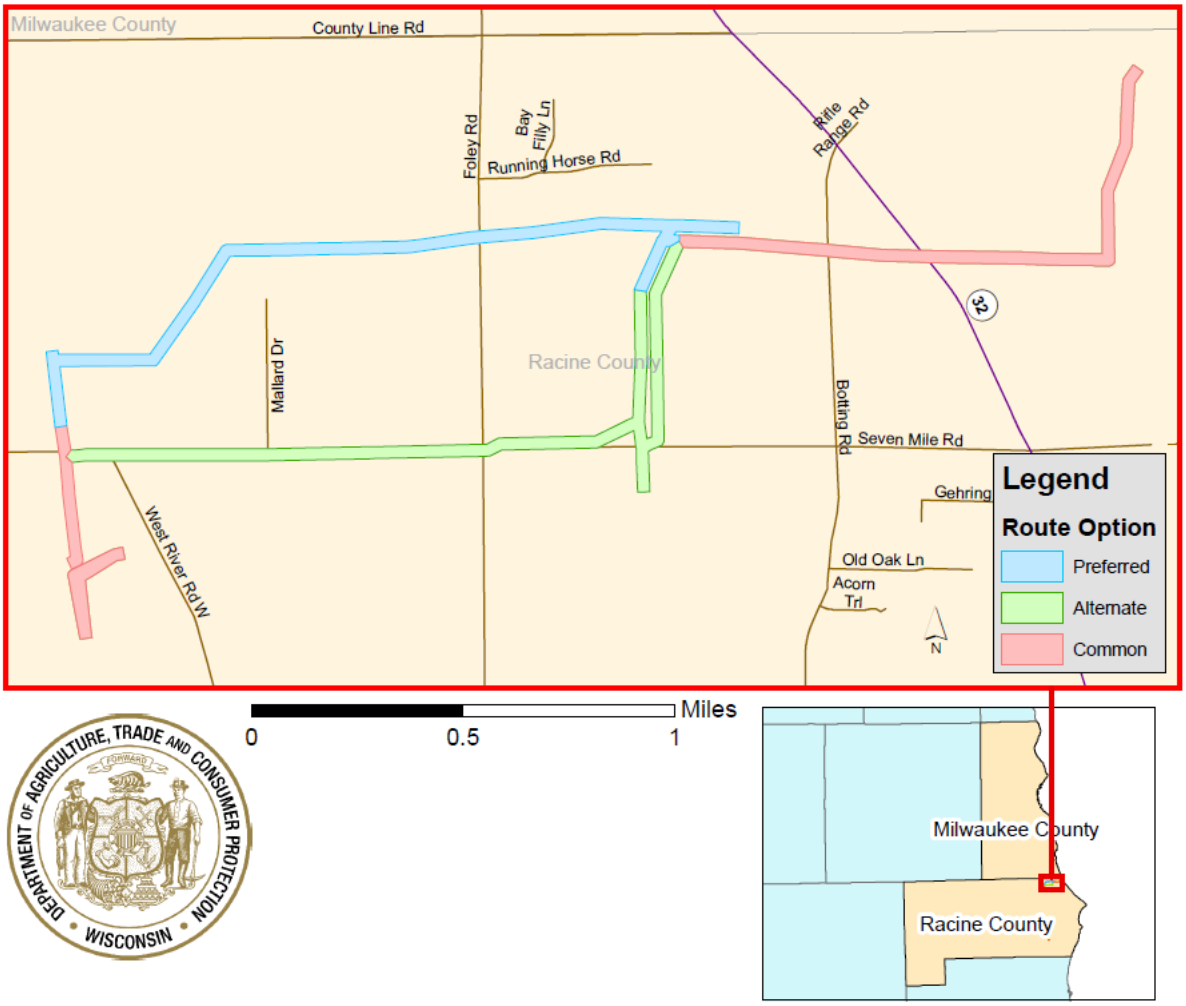
The Public Service Commission of Wisconsin (PSC) has authority over the Project and ATC must obtain a Certificate of Public Convenience and Necessity (CPCN) to obtain the right to proceed with the Project. Through the issuance of a CPCN, the PSC will select the project route and other project criteria ATC shall follow. On September 25, 2025, the PSC determined the ATC's CPCN application (PSC REF # 567093) to be complete and is reviewing project information in order to make a ruling on the CPCN. The Department will provide the PSC with AIS #4625 as evidence to aid in determining the outcome of ATC's 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 8. The AIS analysis begins on page 11 with information on the project located in Section 2. Information and conclusions on the agricultural setting of Racine 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 #4625 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 the Project Initiator Feedback Form (Appendix E).

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.



This map is prepared by Wisconsin Department of Agriculture, Trade and Consumer Protection for administering the Agricultural Impact Statement Program. This map is not intended to be used as a survey plat or for anything other than demonstration of a portion of proposed route options being considered for the project, which is subject to change. Date Created: October 23, 2025

Figure 1: Location of the proposed routes for the Project that are being reviewed for this AIS, excluding staging areas. Entire proposed Project that will be reviewed by the PSC can be found in Appendix A, Figure 1.

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 Elm Rd – Racine Transmission Project. Should the PSC approve the Project, the Department provides the following recommendations, in accordance with Wis. Stat. §32.035(4)(b), to ATC and agricultural landowners and operators to help mitigate impacts on agricultural lands and agricultural operations.

Recommendations to ATC

1) The Department recommends ATC follow all the recommended mitigation efforts described in Section 5.4 through Section 5.7 to mitigate project impacts to or regarding: soil health, drainage, agricultural infrastructure, and erosion and conservation practices.

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

3) ATC should provide landowners with direct phone numbers and email addresses to ATC's Agricultural Specialist and 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.

4) 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 ATC shall compensate the agricultural operators for crop damages.

5) 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.

6) 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 Enhancement Program (CREP), Farmland Preservation Program (FP), or Managed Forest Law (MFL).

7) ATC should work with landowners to identify effective CRP agreements prior to any construction or site disturbance activities and 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 as soon as expected construction or site disturbance activities are known.

8) ATC is advised to consult the applicable County Land Conservation Department on the existence of installed Soil and Water Resource Management (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.

10) ATC is advised to be cognizant when placing transmission line structures near the EPA Superfund site, Hunts Disposal Landfill, to avoid disrupting the historic waste site and cause potential runoff of contaminants on agricultural lands.

Recommendations to Agricultural Landowners and Operators

1) Agricultural landowners and operators should review Wis. Stat. §182.017 (i.e. the Landowner Bill of Rights) 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 5.3 through Section 5.7 to mitigate project impacts to or regarding: clean up and restoration, soil health, drainage, agricultural infrastructure, and erosion and conservation practices.

3) The Department recommends that the landowners or farm operators with a CRP agreement consult with their local Farm Service Agency (FSA) contact and discuss the impacts of the proposed project to determine what information is necessary to share with ATC in order to maintain compliance with 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 contact information for land operators, renters or tenants that ATC may reach out to for a complete understanding of these practices.

5) 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.

6) 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 ATC staff member, as designated by ATC, responsible for handling compensation for release of lands from conservation programs.

7) 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.

8) 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.

9) Landowners should fully describe and discuss property improvements and agricultural operations with appraisers to establish the appropriate value of the affected property.

10) 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.

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

AGRICULTURAL IMPACT STATEMENT

1. INTRODUCTION

The Wisconsin Department of Agriculture, Trade and Consumer Protection (the Department) has prepared Agricultural Impact Statement (AIS) #4625 in accordance with Wis. Stat. §32.035 for the proposed construction of a new 345 kilovolt (kV) electric transmission line in Racine County by American Transmission Company LLC and its corporate manager ATC Management, Inc (Collectively, "ATC"). The applicant is proposing to construct the Elm Road – Racine Transmission Project ("the Project"). The proposed Project consists of creating a second 345 kV line between the Elm Road and Racine Substations by converting the south portion of the existing 138 kV 812 Line to 345 kV operation and building approximately 3.7 miles of new 345 kV line on new ROW, connecting the converted portion of the existing Line 812 to the Elm Road Substation (ATC, 2025; DATCP, 2025). This Project is also included in the Midcontinent Independent System Operator, Inc.'s (MISO) Long Range Transmission Plan (LRTP) Tranche 2.1 as a component of Project 29 (MTEP ID# 50562) (ATC, 2025; DATCP, 2025).

ATC has proposed two alternative routes for the Project, referred to as the Primary Route and the Alternate Route. The Primary Route is comprised of segments C, D, E, F, G, and U and the Alternate Route is comprised of segments H, I, J, K, L, M, N and V. For both the Primary and Alternative Routes, ATC proposes the inclusion of a Common Route consisting of Segments A, B, O, P, Q, R, S, and T that both the Primary and Alternate Routes will follow Existing ROW within segments R, S and part of Q will not be reviewed in this AIS (refer to Figure 1; a full map of the Project that will be reviewed by the PSC is attached in Appendix A Figure 1).

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 ATC 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 has submitted a Certificate of Public Convenience and Necessity (CPCN) to the Public Service Commission of Wisconsin (PSC) (PSC REF # 567093) to obtain approval to construct the Project

(ATC, 2025). The PSC has assigned the Project PSC Docket ID: 137-CE-215, 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 C. Additional references to statutes that govern eminent domain and condemnation processes and other sources of information are also included in Appendices B and D.

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, 2025). 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 a new 345 kV transmission line from the Elm Road Substation in the City of Oak Creek, Milwaukee County, to the Racine Substation in the City of Racine, Racine County, Wisconsin. The Elm Road and Racine Substation footprints will not change as part of this Project. Any new equipment associated with the scope of this Project will fit within the existing substation yards.

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, depending on the selected route, will impact up to 42 agricultural landowners and between approximately 73.2 – 79.1 acres of agricultural lands, excluding staging areas. For the Project, ATC has proposed the following totals for transmission structures installed within agricultural fields: seven structures along the Primary Route, five structures along the Alternative Route, and five structures along the Common Route. A full list of

the impacted acres for each agricultural landowner is provided Appendix A, Table 2.

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. As part of the PSC's review process, a project initiator's proposed "preferred" or "alternate" route design as well as individual proposed route segments and associated impacts are analyzed to determine the final, approved route for the Project. If applicable to the Project, it is within the Commission's authority to choose a differing combination of the proposed route segments using connecting methods that have been assessed by the project initiator for potential impacts and practicability and are described in the Project's PSC docket record.

ATC submitted an application for a CPCN for the Project to the PSC on August 26, 2025 under PSC Docket ID: 137-CE-215 (ATC, 2025). 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 and Purpose

The proposed project includes creation of a second 345 kV line between the Elm Road and Racine Substations in Milwaukee and Racine counties. ATC intends to accomplish this by converting the south portion of Line 812 to 345 kV operation and building approximately 3.7 miles of new 345 kV line on new right-of-way (ROW), connecting the converted portion of Line 812 to the Elm Road Substation. The substation scope for the Project will include a new 345 kV breaker at Elm Road and new 345 kV breakers and buses to complete the ultimate three-run breaker-and-a-half configuration at the Racine Substation. This Project is also included in the Midcontinent

Independent System Operator, Inc.'s (MISO) Long Range Transmission Plan (LRTP) Tranche 2.1 as a component of Project 29 (MTEP ID# 50562).

According to the CPCN application (PSC REF # 567093), ATC has offered the PSC two different route options, referred to here as the Primary Route (noted as the "Preferred Route" in the CPCN) and the Alternate Route. The Primary Route is 12.8 miles long (including the Common Route) and the Alternate Route is 13.0 miles long (including the Common Route). ATC stated in the CPCN (PSC REF # 567093) that the Primary Route is their preferred route because it would impact fewer property owners, is located further from habitable structures within 300 feet of its centerline, is slightly shorter, and parallels existing transmission facilities for more than 93 percent of its route.

2.3.1. Project Need

According to the AIN and the CPCN application, project need is based on three main drivers: increasing load interconnections, generator interconnections, and completion of the MISO LRTP Tranche 2.1 Project 29.

According to ATC, the Elm Road to Racine area is a key transmission corridor in southeast Wisconsin (ATC, 2025). Noting multiple new large load interconnection requests in southeast Wisconsin to come online in 2025-2027 and beyond, ATC expects load interconnection requests will stress existing facilities within the Elm Road-Racine corridor. The project will help achieve compliance with North American Reliability Corporation standards. Additionally, the 2020 Cycle for Midcontinent Independent System Operator, Inc (MISO) Definitive Planning Phase (DPP) has identified this project as a required network upgrade. Finally, the Project is a subset of the MISO LRTP Tranche 2.1 portfolio Project 29 (Bluemound – Arcadian – Waukesha – Muskego – Elm Road – Racine, MTEP ID# 50562), projects that are recommended by MISO to meet transmission reliability, economic and policy needs to meet energy demands in the region (ATC, 2025).

2.3.1. Project Location

The proposed project is located in the City Oak Creek in Milwaukee County and in the City of Racine and the villages of Mount Pleasant and Caledonia in Racine County. While the substation footprints for Elm Road Substation and Racine Substation will not change as part of the project, ATC has stated that they intend to acquire new high-voltage easements for the project for both new ROW and where the project ROW overlaps existing transmission line ROW.

2.3.2. Preferred and Alternate Project System with Route Description

The Primary and Alternative Routes of the Project occur within Milwaukee and Racine Counties, WI (Figure 1; Appendix A, Figure 1).

According to the AIN submitted to the Department (DATCP, 2025) and the CPCN (PSC REF # 567093) submitted to the PSC under Docket ID 137-CE-215 (ATC, 2025), ATC's preferred solution for the Project, what this AIS will call the "Primary Route", is to convert around nine miles of the Oak Creek–Racine 138 kV 812 Line to 345 kV and retire the remaining portion of the line. This route will also include construction of around 3.7 miles of a new 345 kV line on new ROW from the Elm Road Substation to converge with the converted portion of the 812 line. The Primary route will also include modifications are the Elm Road and Racine Substations. At the Elm Road Substation, this involves terminating the new line on the existing rung on the 345 kV breaker-and-a-half configuration (ATC, 2025). At the Racine Substation, this involves reconfiguring the 345 kV ring bus to a breaker-and-a-half configuration to provide a new termination point for a new 345 kV line. The Primary Route consists of the following segments: C, D, E, F, G, and U.

ATC's Alternate Route will include the same modifications at the Elm Road and Racine Substations proposed for the Primary Route, however it will consist of building a new 345 kV line on new ROW (ATC, 2025). The Alternate Route consists of the following segments: H, I, J, K, L, M, N and V.

The routing of these transmission lines from Elm Road to Racine is achieved by including the Common Route (consisting of Segments A, B, O, P, Q, R, S, and T) in both the Primary and Alternate Routes (Appendix A, Figure 1).

ATC states that transmission line construction will be confined to the ROW, access routes, and laydown and staging areas with most disturbances occurring in the area immediately surrounding transmission line structures (ATC, 2025). ATC has stated that they will use existing roads or ROW and arranged access locations where roadways are not present, but in areas where access cannot be gained from existing roads, some disturbance from vehicular traffic may occur. This disturbance may include clearing of vegetative cover, soil compaction, vehicular tracking, and some topsoil disturbance.

2.3.3. Off-ROW Access Roads

According to the AIN and the CPCN application, off-ROW access will consist of a temporary matted access lane to be removed and restored upon Project completion. At this time, ATC has identified five off-ROW access roads necessary to construct the Primary Route, five off-ROW access roads to construct the Alternate Route, and 14 off-ROW access roads to construct the Common Route. ATC has stated that 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. Once construction is complete, any off-ROW disturbances will be restored to pre-construction conditions. A site map depicting proposed off-ROW access is provided in Appendix A, Figure 4. (Docket ID: 137-CE-215).

2.3.4. Staging Areas

Temporary staging areas (laydown yards/laydown areas) outside of the Project ROW will be utilized to store job trailers, construction vehicles and equipment, transmission line structures, conductor, cables and equipment, and other related material/equipment.

ATC has identified six potential construction laydown areas for the Project based on their proximity to the proposed routes. Preference was given to locations where existing improved parking lots were present or active quarries and gravel pits had the capacity needed to store equipment and personnel during the construction phases. ATC's goal in selecting potential sites was to avoid additional expansion or ground disturbances. Two of the staging areas, LY-03 and LY-04, are described as having agricultural land use (idle or fallow fields) on all or part of the staging area.

The potential laydown yards for each route are listed in Table 1.

Table 1: ATC's proposed staging areas for the proposed Elm Road – Racine Transmission Project (ATC, 2025).

Laydown Yard	**Address**	**Description**
Fox Glen Corp. (LY-01)	2274 County Line Rd Franklin, WI 53126	Gravel lot. ATC describes it as a previous location of demolished abuilding.
Amston Trailer (LY-02)	7214 E Frontage Rd Caledonia, WI 53108	Improved gravel lot enclosed with fencing.
County G (LY-03)	12760 CR-G Caledonia, WI 53108	Landuse described as idle or fallow field. ATC describes that it has been improved for development.
27th St & CR-K Yard – West (LY-04)	3845 S 27th St Franksville, WI 53126	Landuse partially described as idle or fallow field
27th St & CR-K Yard – East (LY-05)	3845 S 27th St Franksville, WI 53126	Improved gravel lot.
ATC Storage Yard – Racine SS (LY-06)	2300 Oakes Rd Racine, WI 53406	Improved gravel lot.

2.3.5. Existing Transmission Lines and Facilities

The Elm Road Substation is an existing substation located in Oak Creek, Wisconsin, and the Racine Substation is in Racine, Wisconsin. Existing transmission lines along the Primary, Alternate, and Common Routes include 138-Kv, 230-Kv, and 345-kV lines, with the majority of all Routes parallelling existing corridors (ATC, 2025).

The existing 138-kV Line 812 from Racine to Oak Creek will be converted into a 345-kV Line W-40 from Racine to Elm Road. The existing 138 kV Line 812 terminal will be retired and spared in place.

At Racine, the existing 345-kV ring bus will be converted into a breaker and a half configuration with a new breaker and a half-rung addition. According to the CPCN, ATC intends to acquire new high-voltage easements for this Project for the new ROW and utilize existing easements where the Project ROW overlaps existing transmission line ROW (ATC, 2025).

Refer to Appendix B Table 1 (PSC REF # 559474) of the CPCN application for more information on ROW sharing with existing transmission lines

2.3.6. Project Routing and Siting

Based on the project endpoints (Elm Road Substation and the Racine Substation), ATC assembled a routing team to evaluate route alternatives based on existing linear features, such as transmission lines, other utilities, highways, and railroads, consistent with the siting priorities established in Wis. Stats. § 1.12(6)). Criteria set forth in Wis. Stats. § 1.12(6) Siting of Electric Transmission Facilities contained within the State Energy Policy states that corridors should be utilized in the following order of priority:

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

In the CPCN application, ATC identifies 76 evaluation criteria used to compare route segment options based on environmental, land use, social, and engineering features (refer to Table 5.1-1: ATC Analysis Criteria, page 33 of the CPCN; (PSC REF # 567093)). As a result of this analysis, 23 segments were combined into four end-to-end routes that were reviewed using Wis. Stat. § 196.491(3)(d) criteria 2-8 while assuming a 150-foot ROW for each route and a potential centerline. This analysis resulted in the two routes proposed in the CPCN – the Primary Route and Alternate Route.

As noted within the CPCN application, ATC prefers the Primary Route based on their determination that this route will impact fewer property owners, is located further from habitable structures within 300 feet of its centerline, is slightly shorter, and parallels existing transmission facilities for more than 93 percent of its route.

Additional information on route alternatives and ATC's analysis can be found within the Project application for a CPCN to PSC, under PSC Docket ID: 137-CE-215 (ATC, 2025).

2.3.7. Project Schedule

According to the AIN and the CPCN application, pending approval by the PSC and obtaining all state agency permits, the estimated construction duration of the new transmission lines is approximately 15 months. Construction is expected to begin in October 2026 and be in-service by January 2028, pending agency permits and authorizations.

Table 2: The anticipated project timeline for the proposed Project, pending approval by the PSC and obtaining all state permits (DATCP, 2025; ATC, 2025).

Project Activity	Preliminary Date
Submittal of PSCW CPCN Application and WDNR Utility Permit	August 2025
PSCW CPCN Approval and Order	September 2026
WDNR Utility Permit Issuance – Anticipated	October 2026
Start Construction	October 2026
Project In-Service	January 2028

2.4. Project Right-of-Way (ROW)

In the CPCN application ATC states that the majority of both the Primary and Alternate Routes parallel existing corridors, including existing ATC transmission line corridors, public road ROW, and railroad ROW (ATC, 2025). ATC notes that all new single-circuit corridors will be a fixed 150 feet in width. When paralleling an existing transmission line corridor, a 190 foot topple distance will be maintained between the structure centerlines, where possible

Of the 39 acres of ROW required for the Preferred Route (excluding the Common Route), approximately 14 acres will be new ROW with the remaining 25 acres using existing shared ROW with other transmission line, road and railroad corridors (ATC, 2025). The construction of the Alternate Route, excluding the Common Route, will require approximately 43 acres of ROW, of which 23 acres will require new ROW (ATC, 2025). The remaining 20 acres are shared with the existing transmission line, road and railroad corridors. The Common Route will require approximately 45 acres of ROW, of which approximately 26 acres will be new ROW. The remaining 18 acres are shared with the existing transmission line, road, and railroad corridors (ATC, 2025).

According to the CPCN, running parallel to the Common (~5 acres), Primary (~4.5 acres), and Alternate (~2.9 acres) routes are narrow strips of land between the corridors associated with ATC's existing 230 kV and 345 kV transmission lines (ATC, 2025). ATC has proposed acquiring an easement over these lands to ensure a safe topple distance between its existing transmission structures and the Project's new transmission structures, to improve construction/maintenance

access to the transmission lines and avoid the creation of uneconomic remnants for landowners.

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

Racine County

The Department certified Racine County's current FP plan in 2024 for a ten-year period ending in 2034 (Racine County, 2024). The criteria for land planned for FP in Racine County includes parcels that are predominately in or planned to support active agriculture, agriculture accessory, agricultural-related or natural resource use; parcels at least 50% covered by NRCS Class I, II or III soils; parcels that are located in a block of similar parcels at least 100 acres; parcels that are identified as prime agricultural land or agricultural preservation on town and village adopted future land use maps; and parcels that are currently zoned for agricultural preservation (Racine County, 2024). Only the towns of Burlington and Waterford and the Village of Mount Pleasant in Racine County have lands that are planned for FP as part of the county's FP Plan. There are no lands planned for farmland preservation in the county's FP plan that are affected by the Project's proposed routes.

Milwaukee County

Milwaukee County does not have an FP plan certified by the Department.

3.1.2. Farmland Preservation Zoning

Establishing FP zoning strengthens farmland protections beyond what an FP plan affords. ATC has applied for a CPCN under Wis. Stat. § 196.491 from the PSC. If such certificate is issued, the project will be a permitted use in the FP zoned area under Wis. Stat. § 91.44(f). If a CPCN is not issued, the project will be subject to conditional use regulations in the FP zoned area under Wis. Stat. § 91.46(4) and must meet the requirements listed under Wis. Stat. § 91.46(4)(a)-(4)I.

There are no certified FP zoning jurisdictions located within the Project's proposed area.

Refer to Section 5.5.3: *Stormwater & Erosion Control Permitting* for further discussion on what local zoning regulations may apply to the Project's land disturbance activities pending PSC approving the Project's CPCN.

3.1.3. 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.

A review of the Department's AEA program shows Racine County does not contain an AEA.

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 Racine County.

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 organizations such as land trusts may also hold agricultural conservation easements. Based on a review of the USGS Protected Areas Database of the United States Explorer, the Department found no publicly held easements that will be impacted by the Project (USGS PAD-US, 2025). There may be other public or private conservation easements that were not identified within the federal database that DATCP reviewed. DATCP recommends that ATC works with the landowners to verify if there are other conservation agreements within the project area.

Compensation to landowners for required releases of land enrolled in a conservation easement program is typically determined as part of the appraisal and acquisition process with the project initiator under Wisconsin Statute § 32. Refer to Wisconsin Statute § 32.06 for condemnation procedure in non-transportation matters.

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 of lands for agricultural use (DATCP, 2021). Landowners who benefit from drainage pay assessments to cover the cost to construct, maintain, and repair 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.

It is the responsibility of the landowner to maintain their CREP or CRP agreements and they can work with ATC 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 ATC in order to maintain compliance with CREP or CRP agreements.

Compensation to landowners for required releases of land enrolled in a conservation easement program is typically determined as part of the appraisal and acquisition process with the project initiator under Wisconsin Statute § 32. Refer to Wisconsin Statute § 32.06 for condemnation procedure in non-transportation matters.

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).

A review of the Department's records indicates that no CREP agreements or easements in Racine County will be directly impacted by 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.

Of the 7 responses to the Department's pre-construction questionnaire, none of the respondents impacted by the project included that part of their land is enrolled within CRP. While the questionnaire did not indicate CRP enrollment, there is still the potential for CRP agreements to occur within the project area.

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. 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 routes will not directly impact any MFL enrolled land.

3.3.4. 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 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.

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 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.

ATC noted to the Department that compensation to landowners with land enrolled in a conservation easement program will be determined as part of the appraisal and acquisition process under Wisconsin Statute § 32 (Appendix E: ATC Feedback Form). Refer to Wisconsin Statute § 32.06 for condemnation procedure in non-transportation matters.

4. AGRICULTURAL IMPACTS

In addition to being a key component of Wis. Stat. §32.035, documenting the agricultural impacts of a project provides ATC 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 Racine County, 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 construction mitigation practices for agricultural land that can be found in section 7.4.4 of ATC's CPCN application (PSC REF # 567093). 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, biological security practices, use of access routes and landowner concerns (ATC, 2025). 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, 2025). 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
- Landowner and Utility Liabilities
- Tree Harvesting and Tree Ownership

- Soil Conservation & Erosion
- Debris Removal
- Consent for Weed & Brush Control
- Interference with television & radio reception
- Right-of-way Restriction

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 (refer to Appendix C 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 will affect approximately 73.2 – 79.1 acres of agricultural lands depending on the selected route and affect up to 42 agricultural landowners. Proposed staging areas and laydown yards are described in Section 2.3.4. *Staging Areas*. 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 the land's current easement status (ATC, 2025). The Department analyzed impacts to agricultural land within the proposed new easements.

The Department attempted to contact 35 agricultural landowners impacted by the Project alternative routes who had agricultural impacts of 0.05 acres or more noted in data the Department received in August, 2025 from ATC (Appendix A, Table 1). ATC provided updated route and landowner information was provided in October, 2025. At the time of this analysis, the most current information regarding agricultural landowners and associated acreage numbers proposed to be impacted by the Project are documented in Appendix A, Table 2.

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. At the time of this analysis, ATC does not anticipate any acquisition or relocation of farm residences, buildings or structures as a result of the Project (DATCP, 2025; Julie Hanson, personal communications, December 2025).

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 in the Project ROW routes who had agricultural impacts of one or more acres. In total, the Department mailed 35 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 seven agricultural landowners responded, resulting in a response rate of 20%.

When asked to select any of the concerns shown in Figure 2 about the Project, the primary concern identified by respondents was impacts to drainage/drainage tile. A majority of respondents were also concerned about impacts related to soil productivity and health, crop yield and the potential for parcel severance. Other areas of concern reported by the respondents are shown in Figure 2.

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. Respondents did not report participation in any of the listed agricultural programming or other conservation programs.

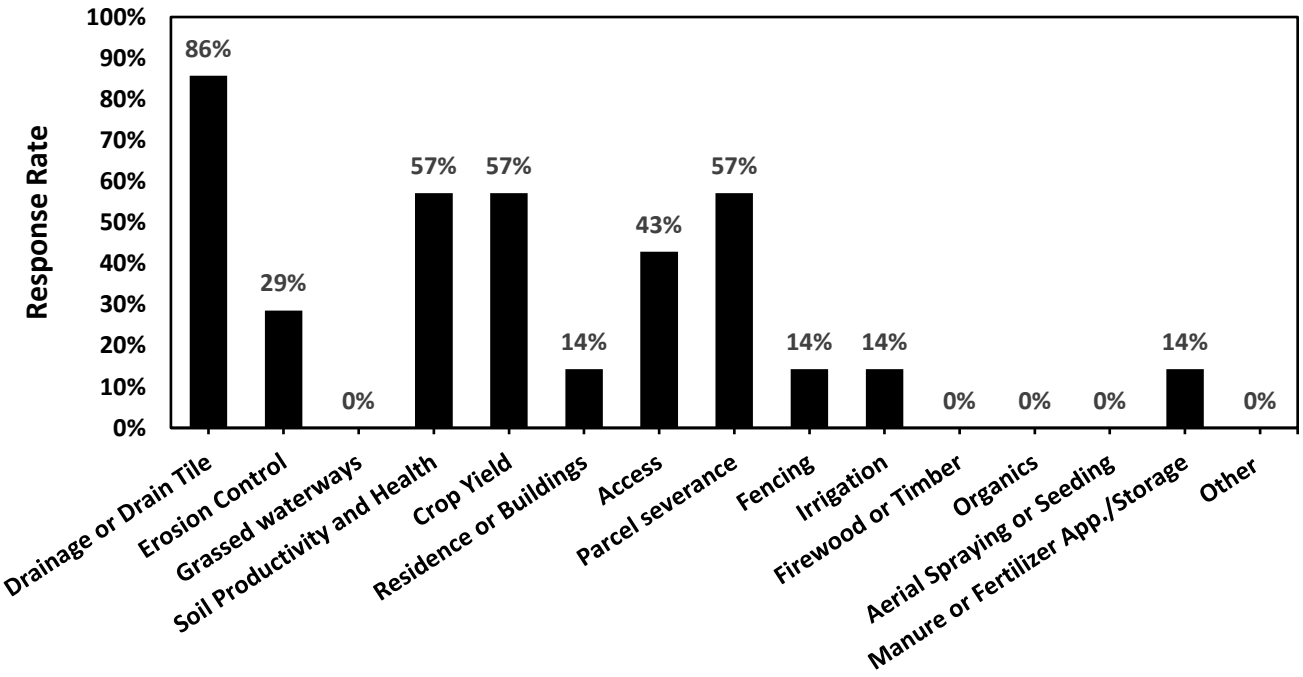


Figure 2: Landowner concerns resulting from the proposed Project.

The Department also requested agricultural landowners report the current land use within the proposed Project ROW as shown in Figure 3. The majority of the respondents (six of the total seven landowners, or 86%) reported their agricultural operations consisted of cropland. Of the total respondents, 14% or one out of seven landowners reported having pasture lands, idle lands, land

with home and farm buildings, or managed woodlands. Two respondents (28.5%) also indicated their agricultural operations possessed livestock and farm animals, including beef cattle and horses.

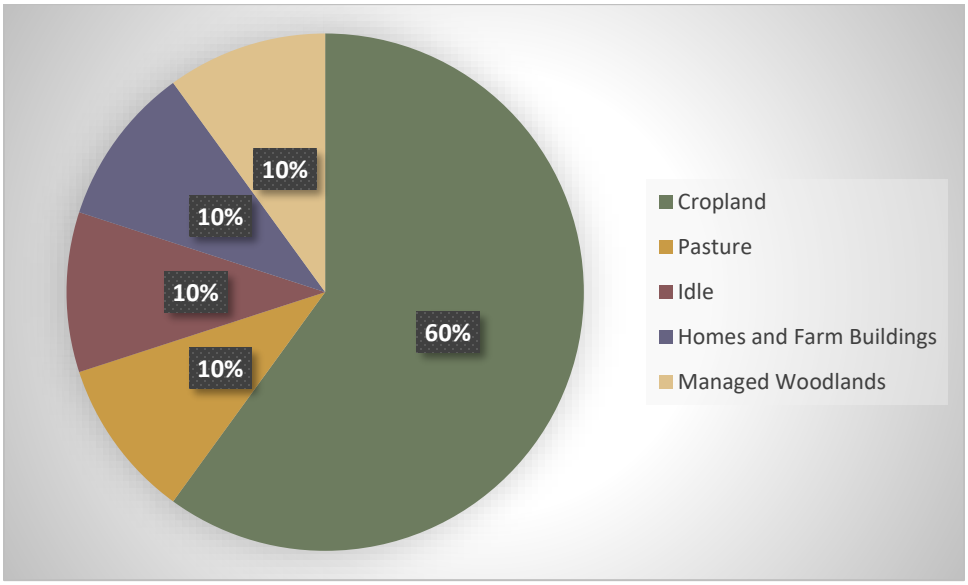


Figure 3: Land use of impacted agricultural parcels as reported by pre-construction questionnaire respondents.

4.3.1. Landowner Concern Conclusions

After review and analysis of the agricultural landowner responses obtained from the Department's pre-construction questionnaire surveys, the Department has identified the following priority areas of agricultural landowner concerns: drainage/drain tiles, soil productivity and health, crop yield and the potential for parcel severance (Figure 2).

Approximately 85% percent of respondents were concerned about erosion control issues associated with the Project. Farmland drainage systems are an important tool for managing water levels especially on hydric soils and for increasing crop yield. 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 related to the productivity of the impacted agricultural land. Please refer to Section 5.5 "Drainage" for additional information about drainage damage mitigation practices.

A majority of respondents were also concerned about soil productivity and health, as well as crop yield and parcel severance. Transmission line projects can exacerbate soil erosion on agricultural land by disturbing soil, removing vegetation, and increasing runoff. These disturbances often lead to greater soil erosion, reduced soil fertility, and potential sedimentation in waterways. Please refer

to Section 5.4 *Soil Health* for further discussion. For further discussion relating to parcel severance, refer to section 4.4.1 *Severance.*

Some landowners shared concerns unique to their property that were not captured within the Department's general analysis in Figure 2.

The Caledonia Conservancy owns and rents agricultural land along the proposed project area. Their operation consists of 18 acres of cropland, 3.75 acres of wetland, and 11.48 acres of a horse trail. While the Caledonia Conservancy shared concerns such as crop loss and impact to drainage tiles also noted by other respondents, the conservancy had a unique concern regarding a horse trail they maintain. They reported concerns of accessing the horse trail, as well as concern that the transmission line towers will impact the aesthetics of the trail system.

Nancy Jutrzonka owns and operates 16 acres of cropland, three acres of pasture, and four aces with homes and farm buildings. Aspects of cropland are impacted directly by the Project in which Jutrzonka shared concerns of soil productivity and health, crop yield as well as potential parcel severance. Beyond this, however, Jutrzonka shared a concern that the Project would cross an Environmental Protection Agency (EPA) Superfund site, Hunts Disposal Landfill in Caledonia, WI. A superfund site is designated through the Comprehensive Environmental Response, Compensation and Liability Act and allows EPA to clean up sites contaminated by hazardous materials (EPA, 2025). EPA lists the contaminants of concern for the historic waste site as: organic compounds such as vinyl chloride, benzene, trichloroethene, xylene, PCBs, and various metals such as arsenic, chromium, and barium. Jutrzonka is concerned that the Project could disrupt the landfill site and potentially cause runoff of pollutants onto surrounding agricultural lands. The Department has shared these concerns with the PSC. The PSC will provide further information regarding this landfill site in Section 3.19 "Contaminated Sites" of the EA the PSC is preparing for this Project (personal communication, Kyle Feltes, November 2025). ATC is advised to be cognizant with placement of transmission line structures in this area to avoid disrupting the historic waste site and cause potential runoff of contaminants on agricultural lands.

Please refer to Section 4.5 *Prime Farmland and Soils* for a comparative analysis of route impacts to agricultural soils. The Department also 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 *Agricultural Impact Mitigation* for additional agricultural mitigation practices.

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 Milwaukee and Racine Counties, WI.

4.4.1. Severance

As proposed, the Primary and Alternate Routes will temporarily and/or permanently sever agricultural parcels to accommodate the construction of the transmission line. 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).

The Project consists of creating a second 345 kV line between the Elm Road and Racine Substations. This is planned to be achieved by converting the portion of Line 812 to 345 kV and building approximately 3.7 miles of new 345 kV on new ROW. ATC discussed in their CPCN application and AIN materials that new construction of single-circuit corridors will require 150 ft permanent ROW (ATC, 2025; DATCP, 2025). For parts of the project that parallel ATC's existing 230 kV and 345 kV transmission lines, a 190 ft easement is planned to be acquired for a safe topple distance as well as maintenance access to the existing and new transmission lines. ATC notes that this topple distance also aims to avoid the creation of uneconomic remnants for landowners (ATC, 2025).

Both the proposed Primary and Alternate Routes hold the potential to sever agricultural parcels during construction as well as introducing new structures and land use conditions within an easement. Within the AIN materials, ATC noted that Segment F held the potential to bisect agricultural parcels, which upon visual review would be parcel ID 104042203038000 (Appendix A Figure 1; DATCP, 2025). A visual inspection of parcel data suggests that additional agricultural parcels within the proposed ROW may be severed, but not necessarily divided into two equal parts, by the construction of the proposed project depending on the selected route (Table 3). For a majority of the parcels listed in Table 3, at least some of the ROW needed for the Project route will come from shared ROW from existing transmission line easements, as is the case for parcel IDs 104042202084000, 104042210010000, and 104042202097000.

Table 3: Agricultural Parcels which may be severed by the proposed Project by route, landowner of record and acres the route crosses.

Landowner Name	Parcel ID	Route Option	Acres Impacted
BEVERLY J REHBEIN FAMILY TRUST DATED MAY 30, 2008	104042202084000	Alternate	10.93435371
DITTMAR TRUST BRIAN C	104042203032000	Primary	0.681844831
DITTMAR TRUST BRIAN C	104042203037000	Primary	0.656177044
ERICA L BORCHARDT	104042203031000	Primary	0.735801816
PETERKA FARMS, INC LJR	104042210010000	Common	1.749577284
VITUS HLOUSHEK JR	104042203038000	Primary	4.007077694
WISCONSIN ELECTRIC POWER COMPANY	104042201029000	Common	8.557311058
WISCONSIN ELECTRIC POWER COMPANY	104042201058000	Common	6.496479511
WISCONSIN ELECTRIC POWER COMPANY	104042202097000	Primary, Alternate, Common	10.04611683

The impacts of parcel severance during construction may include crop damage, field access issues or loss amongst others. After project construction restoration, many pre-existing agricultural land uses should be able to return, which further reduces the potential for permanent severance. During the pre-construction phase, landowners concerned about the impacts of parcel severance should communicate the location of property improvements such as structures, field access points drain tile or installed conservation practices; existing certifications (organic, etc.); management of livestock including the location of existing fencing within the project ROW. Landowners are encouraged to review Section 7.4.4 of the project CPCN (PSC REF # 567093) application 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 other 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 Wisconsin Statute § 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, both the Primary and Alternate Route proposed for the Project have the potential to permanently create small amounts of agricultural wastelands in the immediate area surrounding each transmission line pole (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 to the degree possible.

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 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.

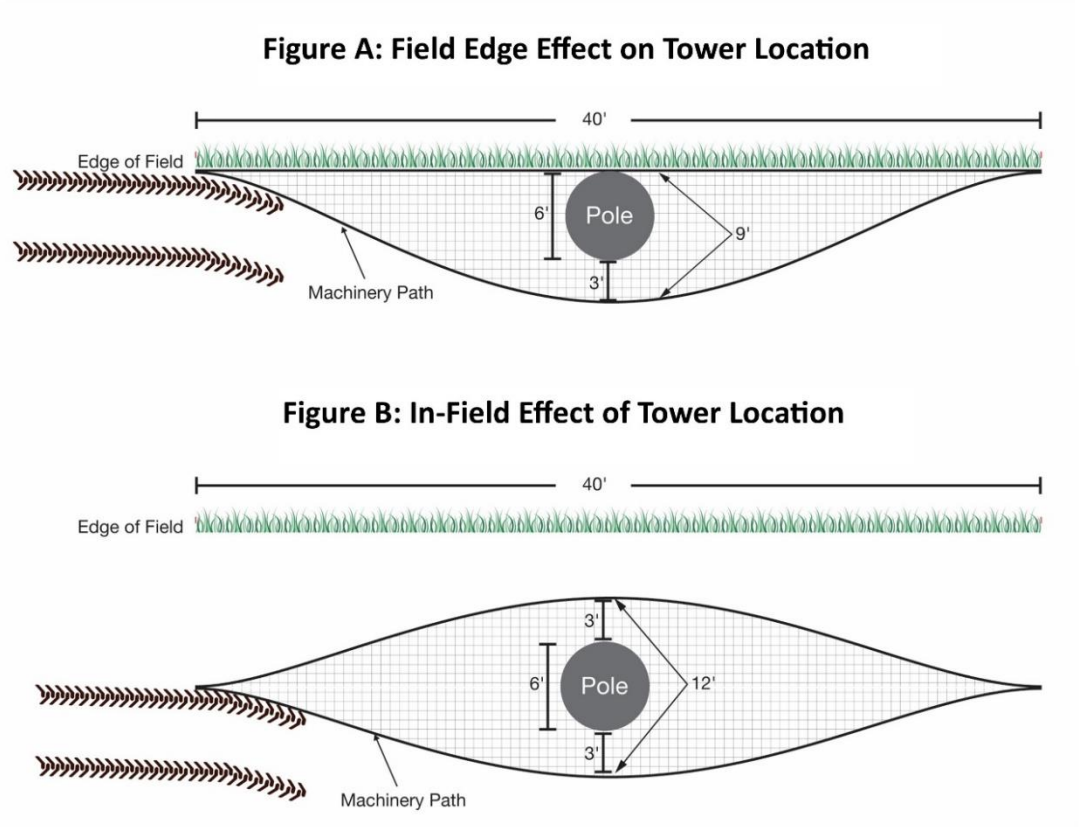


Figure 4 A and B: Examples of agricultural wastelands created by altering the pathway of agricultural machinery to navigate around transmission line towers along a field edge (Figure A) and within a field (Figure B).

4.5. Prime Farmland and Soils

In spatial data provided in the AIN, ATC reported the Project will impact approximately between 73.2 – 79.1 acres of agricultural lands, including cropland, forest management land, pasture, specialty farmland and other agricultural land, and agricultural soils depending on the selected route. This soils analysis includes lands to be used for transmission line ROW, laydown yards/workspaces, and off ROW access roads.

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 4). Prime farmland is designated by the USDA according to section 622.3 of the National Soil Survey Handbook (USDA, 2017b) 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 4. The soil texture of agricultural soils impacted by the Project was analyzed, in general terms, across the project ROW.

ATC proposes a Common Route where the Primary Route and the Alternate Route overlap and would occur if either the Primary Route or the Alternate Route are selected as is by the PSC. The Common Route will impact approximately 41.8 acres of agricultural soils via proposed transmission line ROW, work areas/laydown yards, substations, and off-ROW access roads. Across impacted parcels for the Common Route, 97.7% of soils hold some level of Federal or State priority designation, with 2.3% classed as not prime farmland. An estimated 24.2 acres of agricultural lands within the Common Route transmission line ROW, work areas/laydown yards, substations, and off ROW access roads are 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.

If selected, the Primary Route, described by ATC as their preferred route, will impact approximately 37.3 acres of agricultural soils via transmission line ROW, work areas/laydown yards, substations, and off ROW access roads. Across impacted parcels for the Primary Route, 97.7% hold some level of Federal or State priority designation, with 2.9% classed as not prime farmland. An estimated 16.1 acres of agricultural lands within the Primary Route transmission line ROW, work areas/laydown yards, substations, and off ROW access roads are known to be hydric or contain hydric inclusions.

If selected, the Alternate Route will impact up to 31.4 acres of agricultural soils via transmission line ROW, work areas/laydown yards, substations, and off ROW access roads. Across impacted parcels in the Alternate Route, 100% hold some level of Federal or State priority designation. An estimated 28.3 acres of agricultural lands within the Alternate Route transmission line ROW, work areas/laydown yards, substations, and off ROW access roads are known to be hydric or contain hydric inclusions.

Across the impacted agricultural parcels in both routes, the soils primarily consist of loam and silt loam textured soils of various soil series. Loam and 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 both the Primary and Alternate Routes will impact or remove prime farmland and high-quality soils. Comparatively, the acreage of potential impacts to prime farmland posed by Alternate Route (31.45 acres) and the potential impacts to prime farmland posed by Primary Route (36.17 acres) are fairly similar, with the Preferred Route impacting approximately 32% more lands. When evaluating the cumulative impacts to all farmlands with some designation of Federal and State importance, the impact of the Primary Route has around 13% more acres than the Alternate Route. According to ATC, approximately 64% of the Primary Route section will be

shared ROW (25 out of 39 acres) and approximately 46% of the Alternate Route section will be shared ROW (20 out of 43 acres).

In reviewing the Primary and Alternate Routes for agricultural impacts to agricultural conservation programs, agricultural landowner concerns, potential for severance-, access- and wasteland-related issues, as well as analysis of affected prime farmland and soils, the Department determined that the proposed routes hold comparable degrees of impact. In the following section, the Department recommends agricultural mitigation measures regardless of route to ATC and agricultural landowners.

Table 4: Agricultural soils, shown by Project route and farmland classification, impacted by the proposed Project.

Soil Texture	**Prime Farmland*** (acre)	**Prime Farmland if Drained◊** (acre)	**Farmland of Statewide Importance₮** (acre)	**Not Prime Farmland◊** (acre)	**Total** (acre)
Primary Route					
Loam	15.2	0.4	0.9	3.0	19.4
Muck	0.0	0.4	0.0	0.0	0.4
Other, water	0.0	0.0	0.2	0.0	0.2
Sandy Loam	0.5	0.0	0.0	0.0	0.5
Silt Loam	9.1	0.0	0.0	3.8	12.9
Silty Clay Loam	0.0	0.0	0.0	3.8	3.8
				Primary Route Total	37.3
Alternate Route					
Fine Sandy Loam	1.6	0.0	0.0	0.0	1.6
Loam	6.9	0.0	0.0	5.3	12.2
Muck	0.0	7.1	0.0	0.0	7.1
Silt Loam	1.8	0.0	0.0	1.0	2.8
Silty Clay Loam	0.0	0.0	0.0	7.8	7.8
				Alternate Route Total	31.4
Common Route					
Loam	3.6	0.0	0.0	2.4	6.0
Other, Gravel	0.0	0.0	0.6	0.0	0.6

Other, Water	0.0	0.0	0.3	0.0	0.3
Silt Loam	23.1	0.1	0.0	11.0	34.1
Silty Clay Loam	0.0	0.0	0.0	0.7	0.7
				Common Route Total	41.8

*__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.

Ŧ__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.

Φ__Not Prime farmland__, indicates farmland is neither prime farmland nor of designated importance.

5. AGRICULTURAL IMPACT MITIGATION

ATC has indicated within their CPCN application and AIN, pending Project approval, 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, use of off-ROW access roads, 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 (DATCP, 2025; ATC, 2025).

The Department recommends that landowners who 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 the Project occur.

5.1. Environmental Impact Monitor (IEM), Agricultural Inspector (AI) & Independent Agricultural Monitor (IAM)

When a project affects environmental and agricultural resources, an environmental and/or agricultural monitor or inspector may need to be hired. Environmental Inspectors (Eis) and Independent Environmental Monitors (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. When hired, an IEM works on behalf of the regulatory agency as opposed to the utility. The IEM is also responsible for reporting incidents and has the power to stop project work if construction activities violate permits, approvals, FERC order conditions, or agreement with a state regulatory agency.

In comparison, an Agricultural Inspector (AI) or Independent Agricultural monitor (IAM) monitor project construction & restoration 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. Each will also verify if ATC is complying with any agricultural best management practices or conditions established by ATC or required by a regulatory agency. The main difference between an AI and an IAM is that an IAM works on behalf of the regulatory agency, as opposed to ATC.

The construction of ATC's Elm Rd – Racine Project has the potential to cause various agricultural impacts. ATC stated within the AIN that they have hired an Agricultural Specialist (AS) to work with farmers now and through negotiations, construction and restoration (DATCP, 2025). The AS will address any issues that arise during construction and ensure that the BMPs are implemented properly. The Department believes an AS would be sufficient to ensure ATC adheres to BMPs that ATC will voluntarily adhere to for the Project, as well as the Department has recommended for and adopted by ATC.

5.2. Agricultural Mitigation Measures

ATC proposes mitigation and best management practices in agricultural areas in Section 7.4 of their CPCN application narrative (PSC REF # 567093). ATC denotes that there are likely to be temporary impacts to agricultural land during construction that may include crop loss, soil compaction, damage to potential tile drainage patterns and/or to drainage tiles, as well as potential agricultural practice interruption such as aerial seeding or spraying, windbreaks and organic farms. Additionally, transmission structures that are placed in existing cropland may result in permanent impacts that will impact crop production in the immediate surrounding area such as removing windbreaks, limiting the type of crop that could be planted under transmission lines, as well as requiring adjustment to large farm equipment and maneuverability around structures, and potential fencing impacts.

ATC notes that each agricultural landowner will be consulted regarding farm structures, locations of farm animals and crops, current farm biological security practices, landowner concerns, and use of access routes. Potential impacts to each farm property along the route will be identified and, where practicable, construction impact minimization measures may be implemented (ATC, 2025). Site-specific practices will vary according to the activities of the landowner/farm operator, the type of agricultural operation, the susceptibility of site-specific soils to compaction, the construction activities occurring on the parcel, and the ability to avoid areas of potential concern.

ATC described potential mitigation methods such as offsetting the transmission line structures from the property line to maintain tree lines or other buffers, cleaning construction vehicles prior to entering organic farm parcels and following other organic certification protocols. Additionally, ATC will work with landowners to pay for crop damages, compaction, and potential future crop loss caused by construction activities (ATC, 2025). Yield losses would be supplied by the farm operator and agreed to in a damage report once construction commences.

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.

5.3. Cleanup and Restoration

In accordance with Wis. Stat. § 182.017(7)I, following the completion of construction activities, ATC will restore the area to preconstruction conditions. 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)I, if drainage tiles, fencing or other agricultural features are damaged during construction, ATC is responsible for repairing and/or replacing the damaged feature. Settling compaction claims will depend if the farm operator repairs the compaction or if the project initiator construction crews repair the compaction. Under this same statute, ATC is also responsible for paying for any crop damages caused by construction or maintenance of the transmission line.

ATC uses the USDA Custom Rate Guide as a guideline for crop damage payments and yields are confirmed by the National Agricultural Statistics Service web site which gives the average yield by crop by county (DATCP, 2025). Crop damages and impacted areas are measured using GPS by the contractor. ATC will hire an Agricultural Specialist to assist and coordinate with agricultural landowners to settle damage claims (ATC, 2025; DATCP, 2025). Agricultural landowners should work with ATC and the Agricultural Specialist to determine the most appropriate way to determine the value of the crop within the ROW during the year of construction, as well as future crop value. The Department acknowledges the potential of lingering post-construction yield reductions that may take multiple years to recover.

For any dairy farm or livestock operation impacted by the removal of feed supply within the construction workspace, the Department recommends that agricultural landowners request compensation for increased costs associated with the purchase of forage. Other compensation measures could include ATC compensating for the cost of boarding an animal off-farm.

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. ATC shared that, pending PSC approval of the Project, the project initiator will apply and obtain a Wisconsin Pollutant Discharge Elimination System (WPDES) stormwater permit from the WisDNR, which will establish erosion and stormwater control requirements for the project (Appendix E: ATC Feedback Form).

5.4. Soil Health

Soil structure, texture, organic matter and microorganisms are all important factors that influence soil health (Wolkowski and Lowery, 2008). Project construction activities with the potential to impact soil health include excavation and the movement of heavy equipment through the Project ROW that may compact soil. 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). This construction-caused soil compaction may also damage drain tiles leading to ponded water where none existed prior to construction. Construction activities may also disrupt and/or mix soil profiles within the Project ROW as well as the surrounding area. Research has also shown that construction related impacts (e.g. equipment axle weight, use of excavation, intermixing of soil layer etc.) have the potential to negatively impact crop yields for up to a decade within the ROW depending on the type and severity of the construction impacts (Culley and DOW 1988; Soon et al., 2000; Shi et al., 2014).

ATC has discussed construction impacts related to soils and their applicable management practices in Section 5.5 of its CPCN Application (PSC REF # 567093) including practices like sediment and erosion control, clean up and restoration. Specific practices to minimize or mitigate construction impacts in and around agricultural lands are discussed in Section 7.4.4 of the CPCN Application. The Department recommends ATC take several mitigation efforts related to topsoil mixing, soil compaction, drainage, de-watering, and erosion control referenced in Sections 5.4-5.7.

5.4.1. De-icing & Traction Control

Construction crews commonly apply various products to improve vehicle traction across temporary road matting within the construction ROW to control for wet, slippery, or icy conditions. The application of sodium chloride (e.g. rock salt), as a de-icing agent, to temporary road matting within the construction ROW can lead to sodium chloride rich runoff that has potentially detrimental impacts to the health of nearby soils, ecosystems and surface waters (Richburg, 2001; Kelly *et al.*,

2008; Corsi *et al*., 2010). Alternative de-icing products, which are less damaging to the health of soil, vegetation and ecosystems as compared to sodium chloride, do exist. For example, county highway departments commonly apply sand or small lime chips (1/8" to 3/16" diameter), or a combination of the two as an alternative to sodium chloride, especially when surface temperatures are colder than 15°F when sodium chloride is less effective. University of Wisconsin Madison – Extension publication A3877 provides a list of alternative de-icing products ATC may wish to consider when selecting an alternative(s) to sodium chloride based products. However, sodium chloride may still be required to mitigate situations that pose elevated safety risks.

The Department did not find mention of mitigation practices related to de-icing and traction control within the Project's CPCN application or the AIN materials though the project may work during frozen conditions. To address impacts related to salt applications on temporary road matting over agricultural soils, ATC should consider adopting the following BMPs:

1) ATC should use alternatives to sodium chloride, when safety conditions allow, for de-icing and traction control on temporary road matting when crossing agricultural soils.

2) When the application of sodium chloride is necessary to resolve a matter of safety an alternative method cannot, ATC should limit the sodium chloride application rate to the lowest level required to maintain a safe working environment.

3) ATC should prepare a spill response plan in the event sodium chloride or an alternative product is over applied or spilled onto agricultural soils.

5.4.2. Soil Compaction

Soil compaction is widely known to have a range of 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. Equipment used to construct electric transmission lines has the potential to compact soil and reduce soil productivity on the farmland traversed during construction. Research has 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). 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. UW-Extension report A3367 does not account for use of construction matting, which is a tool used to mitigate compaction from equipment.

As stated within the Project's CPCN, ATC plans to address compaction depending on the characteristics of the site and will utilize decompaction methods as necessary (ATC, 2025). ATC plans to mitigate construction impacts by completing construction during dry or frozen conditions to the extent practicable, use equipment with low ground pressure tires or tracks, place construction matting and distribute axle loads over a larger surface of area to reduce bearing pressure on agricultural soils (DATCP, 2025; Appendix E: ATC Feedback Form).

ATC's mitigation methods mentioned above follow what the Department would recommend for similar projects. However, even with these precautions, the ROW will be compacted to some degree after construction is complete. 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. Landowners with concerns of possible soil compaction should file an inquiry with ATC's land agents or the Agricultural Specialist. 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 decompact 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 measured for compaction.

5.4.3. 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)I to segregate and stockpile topsoil from subsoil.

ATC stated within its CPCN application that for any topsoil mixing, topsoil will be replaced in impacted areas (ATC, 2025).

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) If rutting occurs, allow sufficient time for the soil to dry before repairing the ruts.

5.5. Drainage

Maintaining proper field drainage and preserving soil health is vital to the success of an agricultural 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 reducing soil health, harming or killing crops and other vegetation, concentrating mineral salts, flooding farm buildings, or causing diseases that affect livestock. Construction-caused soil compaction or damaged drain tiles can lead to ponded water where none existed prior to construction. Soil structure, texture, organic matter and microorganisms are all important factors that influence soil health (Wolkowski and Lowery, 2008).

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.

5.5.1. Drainage Tiles

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 there are impacted agricultural parcels that contain drainage tile that could be affected by the Project. The agricultural soils impacted by the proposed Project are also widely known to be hydric or contain hydric inclusions. It is common practice for agricultural operations to install drainage systems to mitigate the impacts of hydric soils, however drainage is most common in eastern and southern areas of the state where soils and topography preclude adequate drainage (Olson, 2020).

If drain tiles are damaged, ATC is required by Wis. Stat. § 182.017(7)I 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 repair as necessary. (ATC, 2025).

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) 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.

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.

5.5.2. 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, DNR permit conditions, and the provisions of the Clean Water Act. ATC is required by Wis. Stat. § 182.017(7)I 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, 2025).

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.

5.5.3. Stormwater & Erosion Control Permitting

The Project's land disturbance activities may be subject to municipal stormwater management and erosion control ordinances, in addition to all state- and federal-level permitting requirements. Project activities may also be subject to shoreland zoning ordinances.

ATC states that it works with all local units of government so that the representatives of those units of government affected by ATC's proposed construction projects are informed concerning ATC's proposed construction activities (Appendix E: ATC Feedback Form). Under Wisconsin Statute § 196.491(3)(i) and detailed under Wisconsin State Statute § 196.491(6), if the PSC issues a CPCN for the Project, ATC is not subject to local ordinances that would preclude or inhibit construction or operation of a facility for any matter that the PSC has addressed or could have addressed during the administrative proceeding. If a CPCN is not issued, the Project's land disturbance activities may be subject to municipal stormwater management and erosion control ordinances, in addition to all state- and federal-level permitting requirements. Project activities may also be subject to shoreland zoning ordinances.

As stormwater and erosion control activities are regulated by other levels of governance – federal, state, county, and local – analysis of the Projects potential for stormwater and erosion impacts are beyond the scope of this AIS.

5.6. Agricultural Infrastructure

5.6.1. 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 producers 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 should install a visual indicator to increase visibility of transmission line wires to aerial application pilots, such as colored wire shielding, marker balls or equivalent marker as appropriate.

5.6.2. 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.

5.6.3. Fencing

The construction process may require fences that cross the Project ROW to be severed. According to Wis. Stat. § 182.017(7)I, 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.

ATC noted to the Department that compensation to landowners will be determined as part of the appraisal and acquisition process under Wisconsin Statute § 32 (Appendix E: ATC Feedback Form). Refer to Wisconsin Statute § 32.06 for condemnation procedure in non-transportation matters.

5.6.4. 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 caused 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, 2025).

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) If the Project routing could 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.
3) If any part of an irrigation system is damaged as a result of construction activities, ATC should pay for and repair reported damages as soon as possible.
4) 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.

ATC noted to the Department that compensation to landowners will be determined as part of the appraisal and acquisition process under Wisconsin Statute § 32 (Appendix E: ATC Feedback Form).

5.6.5. 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 (including 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. 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.

The Department recommends the additional practices listed below:

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) 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/.

3) 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.

4) ATC should generate and distribute a list of organic farms or other certified farms and the prohibited chemicals to their construction staff and contractors.

5) 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.

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

5.7. 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)I 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.

Within their CPCN application, ATC states prior to the start of any land disturbing activity, temporary sediment and erosion control BMPs will be installed along the boundaries of the construction workspace and sensitive resources (ATC, 2025). 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.

5.7.1. 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)I 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 the 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 where practicable. ATC noted that where this is not practicable, excavation will be to grade (Appendix E: ATC Feedback Form).

3) Should ATC create a hole within croplands during the removal of any part of the existing transmission structure, the Department recommends that ATC 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 ATC should the agricultural operator for an appropriate depth depending on how deep their tillage equipment runs

5.7.2. 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.

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

1) Livestock owners & operators within the Project ROW who 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 safeguard 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 or equivalent matting at frequently used access points to mitigate soil disturbance and compaction to the degree practicable.

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.

5.7.3. 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.

5.7.4. 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 as 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 fencing, feeders, 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/StrayVoltageHomePage.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.

ATC did not identify confined animal dairy operations within one mile of either proposed route (ATC, 2025). 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, which ATC can assist in coordinating.

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 work with local distribution companies to resolve electrical contacts at livestock feeding operations detected at or above 0.5 volts that are a result of the Project.

5.7.5. Temporary Access Roads

ATC has proposed installing 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)I 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 5.5.1 "Drainage Tiles" when siting an access road over drain tiles.

5.7.6. 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 or equivalent matting 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.

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Interest Groups, Entities and Individuals

ATC and Atwell

Julie Hanson

Kimberly Gutierrez

Carolyn Tanchester

Phillip Capeheart

David Hastings

Agricultural Landowners

Chad Sampson on behalf of Racine County
Diane & Jeffrey Wilkowski
Judy Rehbein
Nancy Jutrzonka
Robert and Judy Grove
Vitus Hloushek Jr.
Osgood Family LLP Dr Norman Osgood
Dittmar Trust Brian C
Erica L Borchardt

WISCONSIN DEPARTMENT OF AGRICULTURE, TRADE AND CONSUMER PROTECTION

DIVISION OF

AGRICULTURAL RESOURCE MANAGEMENT

Agricultural Impact Program
P.O. Box 8911
Madison, WI 53708-8911
608-224-4650

agimpact.wi.gov