

ENBRIDGE RESPONSES TO WDNR INFORMATION REQUEST DATED MARCH 19, 2024
RESPONSES SUBMITTED APRIL 11, 2024

WDNR Statement/Issue	Enbridge Response
<p>1. Based on the 3/20/23 Addendum to Review of Enbridge Line 5 Wisconsin Segment Relocation Project Report by Thompson & Associates Wetland Services, LLC, and the Mashkiiziibii Natural Resources Department (MNRD), wetlands were observed and documented by MNRD in areas that may not have been included in the 2019 and 2020 wetland delineation reports. Please provide updated wetland maps incorporating the wetlands that were observed and reported by MNRD (in a different color/symbol than Enbridge’s delineated wetlands). If the wetlands recorded by MNRD would be directly impacted by the project, please update the wetland crossing table to incorporate these wetlands.</p>	<p>Enbridge has received and reviewed the Thompson & Associates Addendum to Review of Enbridge Line 5 Wisconsin Segment Relocation Project Report. WDNR’s request – to update wetland maps incorporating the wetlands that were observed and reported by MNRD – cannot be completed because the report does not include sufficient data. That report includes only general statements that additional wetlands were found along the Project route. But no GPS location information is provided regarding potential additional wetlands, and no GIS shapefiles are provided delineating the additional wetland boundaries. Accordingly, the report omits necessary wetland information for a delineation prepared consistent with the USACE 1987 Delineation Manual.</p>
<p>2. Describe how if/how soil segregation methods and/or spoil management will occur for work within wetlands that have peat soil and/or are covered with native mosses.</p>	<p>Enbridge is not proposing separate soil segregation methods and/or spoil management methods for delineated bog wetlands or areas with native mosses. Two Eggers and Reed classified bogs will be crossed by the Project (wase001e and wasd1024f2/wasd1024s). The pipeline centerline crosses approximately 19 feet of wetland wase001e). Wetland wasd1024fs/wasd1024s will be crossed by HDD method and will not require soil segregation.</p>
<p>3. Define the WRAM rating of “Low-Invasive.”</p>	<p>The WRAM rating of Low Invasive was used to modify the Low Quality WRAM wetland rating where invasive/non-native species were documented.</p>
<p>4. Provide how often Enbridge plans to clear the permanent ROW post-construction. Provide details on permanent maintenance activities that would take place (e.g. continuous mowing, selective removal of vegetation, etc.)</p>	<p>Enbridge typically maintains the permanent easement by brushing vegetation on a three-to-five-year cycle. Brushing is accomplished using a mowing deck mounted to a skid-steer or similar equipment and cutting vegetation at a height approximately six inches above the ground surface.</p>

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<p>5. Provide specific measures Enbridge will implement to prevent project activities from introducing or spreading Emerald Ash Borer (EAB).</p>	<p>According to the Wisconsin Department of Agricultural, Trade and Consumer Protection, 69 Wisconsin counties have reported detection of this insect since the presence of the EAB was first confirmed in the state in 2008. EAB infestations were confirmed in Iron County in 2021 and in Ashland County in 2022. There are only three Wisconsin counties that have not had an EAB detection since 2008. DATCP’s website states that the EAB was federally deregulated as of January 14, 2021 and Wisconsin rescinded its state quarantine effective July 1, 2023.</p> <p>As discussed in Enbridge’s Environmental Protection Plan (“EPP”), It is Enbridge’s intent to minimize the potential introduction and/or spread of undesirable species (i.e., invasive species, noxious weeds, or crop diseases) along the construction ROW due to pipeline construction activities. To prevent the introduction of identified noxious weeds and invasive species to the Project, construction equipment will be cleaned prior to arriving on the Project.</p> <p>Timber is cut to provide habitat needed for wildlife, control disease problems, open up vistas, make recreational trails, renew vigorous growth, earn income and many other reasons (Harvesting Your Woods Wisconsin DNR). Enbridge is evaluating marketing options for merchantable timber harvested during clearing activities, including partnering with local logging companies for transport of the merchantable timber to respective markets following harvesting. Transport of merchantable timber will comply with relevant forestry practices.</p> <p>As discussed in previous submittals, non-merchantable timber and other woody vegetation will be disposed of by either burning (where permits have been acquired) or will mulch the materials.</p> <p>Enbridge has been in direct communication with the Iron County Forestry Department regarding EAB. Iron County Forestry indicated that EAB has been identified in the Town of Oma in Iron County a few years ago. Iron County Forestry noted that the County manages over 8,600 acres of black ash timber types in the Iron County Forest with no way to control the spread of EAB. The County’s strategy for managing EAB has been to target sawtimber ash trees in their regular timber sales and removing ash pulp trees where possible to favor retention of other species and manage overall harvest of ash species including the retention of proper stocking levels.</p> <p>Iron County also confirmed that they have planned timber harvest along the Line 5 Project corridor extending out from this year (2024) out 30 years from now. The County has recently delayed sale establishment along the corridor to minimize potential overlap with the Project schedule. Iron County Forestry also noted that the County mostly relies on natural recruitment/regeneration in almost all of their forest types for reforestation with</p>
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	northern hardwoods and aspen representing over 70 percent of the County’s managed forestry types, with natural regeneration being the best option in those timber types.
6. Provide photos of wetlands and waterways that are currently crossed by Line 5. With the photos, please provide the coordinates/location of the photo and state how the photo location is representative of the types of wetlands/waterways that would be crossed by the relocation route.	Please see the attached photographs of wetlands and waterbodies located along the existing Enbridge Line 5 pipeline corridor.
<p>7. The Wetland Timed Meander Surveys Report floristic calculator has some errors in the calculations, for example, in “Total % Non-Native Cover” and some of the Mean C and FQI values in the natives species-only boxes. Please correct the calculator error and re-run the calculations. If there are any changes in "FQIa" or "Mean C" after rerunning the calculations, provide those wetland IDs and an updated results summary.</p> <p>Please note, DNR will not be utilizing the Weighted Mean C calculations or the corresponding benchmark ranks from the report: the DNR’s timed meander protocol and corresponding benchmarks utilize absolute percent cover; the report utilized cover class buckets. Benchmark ranks should also only be used when identifying wetlands to NHC community type; the report identified wetlands to Eggers and Reed type.</p>	The amended report is attached incorporating the requested edits. Please also see the amended report for a further discussion of the timed meander method and cover class.

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<p>8. Clarify whether timber matting will be sourced from trees within the pipeline corridor or will be used from existing stock from former projects.</p>	<p>Timber matting will not be sourced from trees within the pipeline corridor due to the time required to harvest, process, and construct the mats. Timber matting will be sourced from vendors contracted directly with sawmills and forestry professionals for acquiring timber used for mat construction.</p> <p>If additional matting is required beyond available new stock, matting may be acquired from existing stock. Mats from existing stock would be cleaned and inspected prior to use on the Project in accordance with Enbridge’s EPP and INS Plan.</p>
<p>9. Provide detail on how wetlands with shallow bedrock areas would be restored to pre-construction conditions if the bedrock parent material is blasted with dynamite.</p>	<p>Following blasting, the fractured bedrock material will be removed from the trench. Clean granular fill (padding) will be placed on the bottom of the trench to protect the pipeline and prevent direct contact between the pipe and rock, which can damage the protective exterior pipeline coating. The pipe will then be lowered into the trench and additional clean granular backfill will be added to cover the sides and the top of the pipe. Native material will then be used to backfill the remainder of the excavation to original grade, including replacement of topsoil following backfilling to restore original wetland grade. A slight crown of material may be left over the backfilled trench area to account for minor settling of the backfilled material. As described in Enbridge’s EPP (Section 11.0) trench breakers will be installed at wetland-upland boundaries to slow the potential flow of subsurface water along the pipeline following backfill.</p> <p>Enbridge notes that “dynamite” is just one form of explosive product that may be used on the Project. The type of explosive product used, and the associated blasting pattern will be selected to maximize the effectiveness of the blasting process to accomplish the desired results while minimizing the mass of explosives required thereby minimizing the potential amount of residual (unconsumed) blasting material. The types of explosives that may be used will have best available detonation properties, low residual waste profiles, and higher safety and reliability of detonation.</p>
<p>10. Provide the depth of dynamite blasting within wetlands and waterways.</p>	<p>Blasting depth is typically approximately one foot below the bottom of the pipe to allow for clean granular fill (padding) to prevent direct contact between the pipe and rock, which can damage the pipeline’s protective exterior coating. Pursuant to federal regulations, the majority of the pipeline will be buried with a depth of cover of 48 inches. Enbridge will ensure that it complies with the federal minimum depth of cover requirements.</p>