



March 10, 2023

Julie Kloss Molina
Enbridge Energy
11 East Superior Street, Suite 125
Duluth, MN 55802

Docket # IP-NO-2020-2-N00471

RE: Wisconsin DNR Comments on Draft Water Quality Monitoring Plan, and Related Information Request – Enbridge Energy Line 5 Wisconsin Segment Relocation Project

Dear Ms. Kloss Molina,

The Wisconsin Department of Natural Resources (DNR) appreciates the opportunity to review the **Enbridge Energy Line 5 Wisconsin Segment Relocation Project – Draft Water Quality Management Plan (Plan)**, as part of the DNR Utility Permit application IP-NO-2020-2-N00471.

In addition to meeting its environmental analysis and disclosure requirements under the Wisconsin Environmental Policy Act (WEPA), the DNR is responsible for determining whether it has reasonable assurance that the proposed Enbridge Line 5 Project (Project) would comply with water quality standards, the public interest, and public and tribal rights. The development and implementation of a robust water quality monitoring plan can help support this determination. The DNR has reviewed the draft Plan dated September 6, 2022 and offers the following comments.

Baseline Data

Baseline data can provide an understanding of surface water conditions prior to project construction and can serve as a foundation for future data collection and assessments. Ideally, baseline water quality data would consist of data from the most recent five years (or from within the last 10 years, if the data are still representative of current conditions, e.g., no major operational changes or reasons to expect water quality changes). Minimum baseline data would span from snowmelt to freeze-up on perennial, intermittent, and ephemeral waterways, as well as high-quality, seep/spring-fed, and open-water wetlands. **As currently proposed, the Plan does not provide, establish, or assess baseline water quality conditions for surface waters that would be crossed or impacted by the proposed Project.**

DNR strongly encourages Enbridge to collaborate with federal and tribal government, Great Lakes Indian Fish & Wildlife Commission (GLIFWC), county conservation departments, local organizations, etc., to assemble existing baseline data for proposed surface water crossings relevant to the Project. SWIMS, the DNR's surface water monitoring database, is one of many publicly available databases that house water quality data that may be relevant to the Project.

DNR SWIMS Database

The Surface Water Integrated Monitoring System (SWIMS) is a DNR system that holds chemistry (water, sediment, fish tissue) data, physical data, biological (macroinvertebrate, aquatic invasives) data and more.

SWIMS is the state's repository of monitoring data for Clean Water Act work and holds a wide variety of river and streams data, including baseline, targeted and evaluation monitoring, and river/watershed planning work. SWIMS is also used by citizen volunteers to store monitoring results for lakes, streams, and wetlands. More information on SWIMS can be found here:

<https://dnr.wisconsin.gov/topic/SurfaceWater/SWIMS>

Water Quality Data Collection and Assessment

A comprehensive water quality plan summarizes how relevant, representative, and quality data would be collected, analyzed, and assessed. Data collection provides us with opportunities to:

- understand existing ecological conditions of resources,
- track and analyze short-term and long-term water quality trends and changes in resource conditions over time,
- identify key factors (stressors) impacting the physical, chemical, and biological conditions of resources,
- assess the extent and impact of major environmental stressors on resources,
- support the development of statistically valid and environmentally relevant reports,
- differentiate between the natural variation of water quality versus responses to anthropogenic impacts,
- refine expectations and determine the success of management actions.

As currently proposed, the Plan does not establish how statistically valid water quality data would be collected and analyzed, nor does it describe how Enbridge would evaluate and interpret the acquired data to assess the extent and impact of the proposed Project on the state's water resources.

The DNR has multiple water quality sampling guidelines and procedures available to the public, including

- [Wisconsin's Consolidated Assessment and Listing Methodology \(WisCALM\)](#)
- [Guidelines for Assessing Fish Communities of Wadable Streams in Wisconsin](#)
- [Guidelines for Qualitative Physical Habitat Evaluation of Wadable Streams](#)
- [Guidelines for Collecting Macroinvertebrate Samples from Wadable Streams](#)
- [Guidelines and Procedures for Surface Water Grab Sampling](#)
- [Guidance for Flow Monitoring in Wadable Streams](#)
- [Guidance for Dissolved Oxygen Meter Sampling](#)

The U.S. EPA also provides tools on how to develop a Quality Assurance Project Plan, which can be found here: <https://www.epa.gov/quality/quality-assurance-project-plan-development-tool>

In addition to the comments summarized above, the DNR requests the following information related to the proposed Plan. If you have any questions regarding this request or the DNR's comments, please call me at 608-405-0016, or email me at benjamin.callan@wi.gov.

Sincerely,



Benjamin Callan
Manager, Integration Services Section

cc:

Tim Drake, ERM
Bill Sande, USACE
Melissa Blankenship, USEPA
Macaulay Haller, DNR
Adam Mednick, DNR
Lucas Mulhall, DNR
Dreux Watermolen, DNR

A. Introduction Section

- 1) The Plan states “*the dams would extend across the entire streambed and would be built to a height to withstand the highest water anticipated at the time of construction.*” Define the term “highest water anticipated” and provide details on how this value would be calculated and/or determined for each waterway crossing.
- 2) Define the terms “normal flow,” “low flow,” and “high flow,” and provide details on how these values would be calculated and/or determined for each waterway crossing.
- 3) Provide details on how waterways would be assessed (off-site and on-site) for flow conditions (normal, low, medium, high) prior to beginning crossing activities.
- 4) Provide details on how Enbridge would ensure that the most appropriate waterway crossing method (dry crossing, wet trench, HDD, etc.) would be performed if on-site conditions do not match expected conditions.
- 5) Provide details on how site-specific bank stabilization materials would be determined prior to construction.
- 6) Provide details on how Enbridge would determine excavated material would not be required as backfill.
- 7) Provide details on the proposed upland disposal locations for excavated material (and show on a map).
- 8) Provide details on how Enbridge would ensure bed and bank stability post-construction and achieve restoration to pre-construction conditions.

Note: Monitoring waterway crossings after snowmelt and larger storm events can help identify erosion problems that may need further site restoration and could otherwise impact downstream water quality.

- 9) Provide details on how Enbridge would ensure the beds of waterways are backfilled to the original horizons, substrates, and elevations.
- 10) Provide greater detail on how waterway and wetland crossings would be monitored pre- and post-construction to ensure proper restoration of the resource.
- 11) Provide details on how waterway and wetland restoration would be determined “successful,” including measurable standards that would need to be met in order for the resource to be determined successfully restored.
- 12) Provide information on any additional sampling, evaluation, protective measures, crossing details, etc. that would be applied specifically to trout streams, including in-water work within trout timing restrictions.
- 13) Provide the crossing method and alternative crossing method(s) anticipated for use at each surface water crossing, dependent on estimated flow conditions, time of year, timing restrictions,

etc. at time of crossing. Include if Enbridge anticipates flowing, standing water, or dry channel conditions at time of crossing.

- 14) During construction, trucks and equipment would be washed to prevent the spread of sediment and invasive species between sites.
- Provide details on the holding ponds for the washing sites, including their proximity to natural resources.
 - Provide details on how Enbridge would contain, treat, and dispose of the washing water to prevent the wastewater from entering wetlands, waterways, and groundwater.
 - Provide details on how Enbridge would sample and monitor wetlands, waterways, and groundwater for water quality (including turbidity, hydrocarbons, etc.) to ensure the wastewater is not impacting the resources.

B. Water Quality

DNR requests the following water quality indicator data (chemical, physical, biological) be collected upstream, downstream, and within water crossing locations for all proposed waterway and wetland* crossings during pre-construction (i.e. baseline conditions), active construction, and post-construction. See below for additional information requests relating to this statement.

Requested Water Quality Indicator Data Pre- and Post-Construction		
Chemical	Physical	Biological
Total Phosphorus	Temperature	Fish Community
Nitrogen – Total Kjeldahl	Turbidity	Macroinvertebrates
Nitrate + Nitrite	Channel width, depth	Fish kills (presence, locations, species)
Ammonia	Riparian disturbance	
Dissolved Oxygen	Vegetative cover, vegetative buffers	Brook Trout Redds (presence, locations)
Sulfate	Fish habitat	
Total Mercury	Bed and bank scouring, deposition	
Conductivity	Bed and bank substrate, substrate embeddedness	
pH		
Total Suspended Solids	Monthly minimum, mean, and maximum recorded flows and velocities	
Chemical Oxygen Demand (COD)		
Biological Oxygen Demand (BOD)	Presence of oil and grease	
Polycyclic Aromatic Hydrocarbons (PAHs)		
Compounds associated with oil and fuel used in construction or operation		
Compounds associated with the crude oil and natural gas liquids transported in Line 5		
Compounds associated with horizontal directional drilling		
Perfluoroalkyl and polyfluoroalkyl substances (PFAS)		
Requested Water Quality Indicator Data During Active Construction		
Chemical	Physical	Biological
Dissolved Oxygen	Turbidity	Fish kills (presence, locations, species)
Conductivity	Presence of oil and grease	
pH		

**Specifically, wetlands that are high-quality, open water, have groundwater influences (e.g., springs or seeps), and those that have shallow bedrock*

- 1) Provide a detailed assessment of existing (baseline) data for each ephemeral, intermittent, and perennial waterway, waterbody, and wetland* that would be crossed by the project via access roads, temporary workspaces, and pipeline installation. The assessment should include an evaluation of:
 - a. Available data (physical, chemical, and biological; see table of requested parameters; provide tables).
 - b. The data source (including link, reference information).
 - c. The relevancy and applicability of the baseline data to the proposed project (for example, location of sampling in reference to the proposed surface water crossing).
 - d. The baseline data parameters that are missing/still needed (see table of requested parameters).
 - e. Proposed plan of how Enbridge would acquire these baseline data prior to beginning the project, including the number and frequency of sample collection. DNR requests Enbridge submit any collected, pre-construction (baseline) data to DNR, USACE, and interested tribes prior to construction.
- 2) Provide a summary for each the selected water quality parameters, including its function and how the parameter would assist in evaluating water quality due to pipeline crossing activities.
- 3) Provide a list (with source, reference information) of the protocols and methods that would be followed during sample collection.
- 4) Provide details on mussel surveys, rare mussels, and monitoring pre-construction.
- 5) Provide information on how sampling protocols/methods would differ by crossing installation method (open-cut trench, HDD, etc.).
- 6) Provide information on how sampling protocols/methods would differ between wadable and non-wadable streams/rivers.
- 7) Provide information on how sampling methods would provide accurate and representative water quality samples of the resource, accounting for seasonal variations, extreme weather events, and cold water habitat communities.
- 8) Provide information on who would be performing the water quality sampling pre-construction, during construction, and post-construction, including who would ensure that monitoring protocols would be followed.
- 9) Define the term “standard analytical methods” in reference to collecting monitoring data and laboratory analysis.
- 10) Provide a list (with source, reference information, contact info) of the certified laboratory(s) that would be contracted to analyze the off-site water quality samples.

- 11) Provided details on quality assurance and quality control for field data collection and lab analysis techniques, including the protocol/method source and reference information.
- 12) The proposed Plan states three of the 27 waterbodies proposed to be sampled are listed under Section 303(d) of the Clean Water Act as impaired and sampling of these sites will include analysis for the respective impairment. Provide details on the additional analysis for impairment that would be conducted for the Section 303(d) waters listed in the Plan.
- 13) Provide photographs upstream and downstream of crossing locations, as well as at the crossing locations pre-construction, during construction, and post-construction to evaluate restoration success.
- 14) Provide updated maps showing water quality sampling locations for all proposed surface water crossings, including upstream, downstream, and crossing locations.
- 15) Provide details on how proposed sampling locations were selected for the Project's proposed surface water crossings (including upstream and downstream) and how these locations would provide an accurate and representative water quality sample for the resource, accounting for seasonal variations and extreme weather events.

Note: Oftentimes, on the more remote sections of the proposed reroute, the first public road crossing can be miles downstream. It is requested Enbridge should instead choose a more appropriate and standardized downstream sampling point and use public road crossings only when they fall within an appropriate distance or when landowner access to the closer appropriate monitoring location is not obtainable. This is especially important for the Bad River and Tyler Forks River crossings, since there are no downstream public road access points prior to the watercourse entering the external boundaries of the Bad River Reservation.

- 16) Provide details on how the number of sampling locations for each site (upstream, downstream, at the crossing location) were chosen for the proposed surface water crossings and how the number of sampling locations for each site would provide a complete, accurate, and representative water quality sample for the surface water crossing.
- 17) Provide details on how Enbridge would ensure and monitor for pipeline integrity post-construction. Provide an integrity management plan that incorporates water quality monitoring and assessment.
- 18) Provide details on water quality sampling methods to evaluate effects of storm events.
- 19) Provide details on how data would be analyzed and interpreted to evaluate project impacts on the resources.

C. Preconstruction Sampling

- 1) Provide details on how Enbridge would ensure ephemeral and intermittent waterways will be assessed for baseline conditions and water quality, considering these waterways do not have continuous flow throughout the year.

- 2) Provide details on how the currently proposed pre-construction sampling Plan to perform grab samples approximately 5 days prior to the start of the stream crossing accurately reflects existing baseline conditions of the waterway/waterbody, taking into account seasonal variations and weather events.
- 3) Provide details on how the currently proposed pre-construction sampling Plan to perform grab samples approximately 5 days prior to the start of the stream crossing accurately reflects federal, tribal, and state-recommended water quality sampling methods and protocols.
- 4) The Plan states “*Enbridge has identified...30 streams for preconstruction water quality sampling.*” Provide details on why the remaining waterways (those not listed in the Plan), and wetlands crossed by/relevant to the Project are not proposed to be sampled for water quality.

D. Active Construction Sampling

- 1) Provide information on how impacts to fish, mussels, and macroinvertebrates would be avoided and minimized during open-cut trenching of the waterways, including how these organisms would be able to safely navigate and inhabit these areas during active construction.
- 2) Provide a monitoring and response plan that includes the following:
 - a. How Enbridge would determine water quality and aquatic communities may be/are in decline during construction, including the number and frequency of sampling that would take place to ensure representative water quality data of the resource
 - b. Steps Enbridge would immediately take if monitoring data indicated a decline in water quality or a violation of water quality standards.
 - c. Steps Enbridge would immediately take if monitoring data indicated a decline in fish or macroinvertebrate health.
 - d. Actions Enbridge would take to respond to and stop the further decline of water quality and aquatic community health.
 - e. Actions Enbridge would take to restore the water quality and aquatic community health after a decline during construction.
 - f. Actions Enbridge would take to monitor the restoration actions.
- 3) Provide details on how water quality monitoring during active pipe construction/installation would differ by installation method (open-cut trench, HDD, etc.).
- 4) Provide details on the screening structure(s) that would be used to pump and transfer water as part a flow bypass system, including how the structure(s) would be designed to avoid and minimize impacts to fisheries, aquatic plants, and macroinvertebrates during its use.
- 5) Provide details on how excavated native soil would be isolated from entering wetlands, waterways, and sensitive areas during open-cut construction in waterways.
- 6) Provide details on how waterway beds consisting of silty substrate would be backfilled and stabilized after excavation.

- 7) If in the field, Enbridge determines that the preferred waterway crossing is no longer conducive due to site conditions or seasonal restrictions (fish-timing, high flows, etc.), provide information on:
 - a. How Enbridge would re-evaluate their construction plans to safely install the pipeline across the waterway while avoiding and minimizing impacts to aquatic organisms and the resource.
 - b. How Enbridge would re-evaluate their water quality monitoring protocols and ensure that appropriate sampling methods are performed during construction.
- 8) Provide details on the proposed pipeline installation methods on known trout streams during trout immigration for spawning times.
- 9) The Plan states “*instream trenching and backfilling would typically be complete within 24 hours or less on minor waterbodies (less than 10 feet wide) and 48 hours or less on intermediate (between 10 and 100 feet wide) or as directed by applicable permits. Use of dry crossing techniques would require additional time associated construction and removal of temporary dams.*” Based on these times, there would be approximately one or two samples taken at the work site/crossing. Provide information on how sampling methods, including the sampling locations and number of samples, would provide accurate and representative water quality data for the resource within this timeframe.
- 10) Provide details on how the collection of additional water quality samples (for turbidity) at the first downstream public road crossing would provide accurate water quality data, representative of true downstream turbidity and turbidity impacts.
- 11) Provide details on how Enbridge will equate NTU to TSS values.
- 12) Provide the source (including reference information) of the Plan’s proposed method for turbidity samples; provide details on how Enbridge will document the location, substrate, depth of fines, etc. where samples are taken :

Enbridge would collect additional water quality samples at the first downstream public road crossing when:

- *Field turbidity sample results (Nephelometric Turbidity Unit or NTU2) are greater than 5 NTUs over upstream level when the upstream levels are 50 NTUs or less; or,*
- *When the downstream NTU readings are greater than 10 percent above upstream NTU readings when the upstream readings are greater than 50 NTUs.*

E. Post Construction Sampling

- 1) Provide details on mussel surveys, rare mussels, and monitoring post-construction.
- 2) Define the timeframe for the term “post-construction” as it applies to the Project; clarify if post-construction would include the operation, maintenance, possible spills, decommissioning activities of the pipeline.

- 3) Provide details on how site restoration and stabilization would be evaluated immediately upon water crossing completion daily for three additional days, one-week post construction, and one-month post-construction.
- 4) Provide details on how restoration of the natural waterway flow would be evaluated immediately upon water crossing completion daily for three additional days, one-week post construction, and one-month post-construction.
- 5) Provide details on how site restoration and stabilization would be evaluated past one-month post-construction.
- 6) Provide details on how the currently proposed frequency, locations, and number of post-construction sampling would accurately reflect long-term restoration, stabilization, and water quality for the resources.
- 7) Provide a post-construction monitoring plan, including the number of years and frequency of water quality sampling and monitoring, that would take place post-construction to ensure representative water quality data of the resources.
- 8) Provide details on the number of years of restoration, stabilization, and natural flow restoration and monitoring that would take place post-construction.
- 9) Provide details on post-construction monitoring that would take place after storm events to ensure waterway restoration remains successful; provide details on how this monitoring would relate to Enbridge's integrity management plan for the pipeline.

F. Horizontal Directional Drills and Direct Pipe Crossings

HDD Inadvertent Return (Waterways):

- 1) Provide details on how bentonite will be contained during directional boring and prevented from entering surface waters.
- 2) Provide details on the types of water quality samples that would be taken in the event of an inadvertent return within a waterway, including a sample collection protocol/method (include source, reference information).
- 3) Provide details on how the collection of water quality samples at each public road crossing downstream of an instream inadvertent return to the exterior boundary of the Bad River Reservation would provide accurate and representative water quality evaluations of an inadvertent return and its impacts on the resource.
- 4) Provide details on how Enbridge would collect water quality samples downstream of the instream inadvertent return if there are no public road crossings downstream; include information on how the sample collection location would provide accurate and representative water quality evaluations of an inadvertent return and its impacts on the resource.
- 5) Provide details on how the collection of water quality samples from stream banks would provide accurate and representative water quality evaluations of the waterway during an instream inadvertent return and its impacts on the resource.

- 6) The Plan states “*Enbridge notes that changes in downstream water quality may be due to inputs from tributaries where the confluence of the tributary and the primary waterbody being sampled occurs upstream of the sampling location.*” Provide details on how Enbridge would assess whether changes in water quality are from an inadvertent return or from natural confluence.
- 7) Provide details on how samples taken every 6 hours would provide accurate and representative water quality evaluations of an inadvertent return and its impacts on the resource.
- 8) Provide details on how Enbridge would determine that an in-stream inadvertent return has been successfully stopped and/or contained.
- 9) Provide details on how water quality samples that are collected from each location daily for an additional five days at each sampling location would provide accurate and representative water quality evaluations of an inadvertent return and its impacts on the resource.
- 10) Provide details on how inadvertent return events and water quality assessments would be reported to DNR, USACE, and interested tribes.

HDD Inadvertent Return (Wetlands):

- 11) Provide details on the types of wetland water quality samples that would be taken in the event of an inadvertent return within wetlands, including a sample collection protocol/method (include source, reference information).
- 12) Provide details on the locations of water quality samples after an inadvertent release and how these locations would provide accurate and representative water quality evaluations of an inadvertent return and its impacts on the resource.
- 13) Provide details on how Enbridge would assess whether changes in water quality are from an inadvertent return or are naturally occurring.
- 14) Provide details on how often water quality samples would be taken and how the timing of these samples would provide accurate and representative water quality evaluations of an inadvertent return and its impacts on the resource.
- 15) Provide details on how Enbridge would determine that a wetland’s inadvertent return has been successfully stopped and/or contained.
- 16) Provide details on how often water quality samples would be collected once an inadvertent return has been contained/stopped and how these samples would provide accurate and representative water quality evaluations of the inadvertent return and its impacts on the resource.
- 17) Provide details on how inadvertent return events and water quality assessments would be reported to DNR, USACE, and interested tribes.

Pipeline Leaks, Spills, Releases Post-Construction (Waterways and Wetlands):

- 18) Provide details on how wetlands and waterways would be evaluated for pipeline leaks, spills, and/or return impacts after pipeline installation is complete.
- 19) Provide a detailed water monitoring and response plan that would be implemented in the event of a leak and/or spill. This response plan should differentiate between, and specifically address monitoring actions to be taken for, spills associated with construction equipment and/or a crude oil or natural gas liquid release during Line 5 operations.
- 20) Provide details on the types of wetland and waterway water quality samples that would be taken in the event of leaks and/or spills, including a sample collection protocol/method (include source, reference information).
- 21) Provide details on the locations of water quality samples after a leak and/or spill and how these locations would provide accurate and representative water quality data of the leak/spill and its impacts on the resource.
- 22) Provide details on how Enbridge would assess whether changes in water quality are from the leak and/or spill or are naturally occurring.
- 23) Provide details on how often water quality samples would be taken and how the timing of these samples would provide accurate and representative water quality data for the leak and/or spill and its impacts on the resource.
- 24) Clarify if/how Enbridge would conduct post-construction sampling as part of pipeline integrity checks and how Enbridge would detect small leaks (automated leak detection systems may not be effective at detecting small leaks).
- 25) Provide details on how Enbridge would determine that the leak and/or spill has been successfully stopped and/or contained.
- 26) Provide details on how often water quality samples would be collected once the leak and/or spill, has been contained/stopped and how these samples would provide accurate and representative water quality data of the leak and/or spills and its impacts on the resource.
- 27) Provide details on how leak and/or spill events and water quality assessments would be reported to DNR, USACE, and interested tribes.

G. Reporting

- 1) Provide greater detail on how Enbridge would assess water quality data for Project impacts and the extent of Project impacts (if any).
- 2) Provide greater detail on water quality sampling reporting, including what would be included in the report, how data would be organized, how data would be interpreted and summarized, when the report would be shared with agencies, the opportunity for agency review and comment, etc.
- 3) Provide details on how waterway and wetland restoration would be determined “successful,” including measurable standards that would need to be met in order for the resource to be

determined successfully restored. Provide details on how Enbridge would report these data and how they would conduct future monitoring until successful restoration is achieved.

- 4) DNR requests sampling data be reported immediately to DNR, USACE, and interested tribes if field/lab results show possible water quality impacts from the Project. A summary report should be provided that includes data results (including laboratory analysis documents), data interpretation, applicability to the Project, mitigation and/or restoration actions, etc.
- 5) DNR requests annual reports be sent to DNR, USACE, and interested tribes that provide relevant data and evaluations on the Project's impacts on water quality. Reports should include original laboratory analysis documents.

H. Other

- 1) For ease of use and orientation, please orient maps to have North facing upwards, whenever possible.
- 2) Provide details on how the proposed HDD installations would follow DNR's HDD Technical Standard, including the following topics:
 - a. The Standards Design Criteria used to help assess the initial condition of the wetland or waterway in question. This is needed to determine not only impacts from construction activities, but also allow assessment of whether the wetland or waterway is returned to pre-construction conditions.
 - b. Geotechnical investigation borings.
 - c. Defining subsurface conditions to avoid risks to aquifer breaches and frac out.
- 3) Provide details on how groundwater quality and quantity (including artesian springs) would be sampled pre-construction, during active construction, post-construction, and throughout the lifetime of the Project; provide details on how water quality data would be evaluated for project-related impacts.
- 4) Provide details on how wildlife surveys and wildlife health would be collected and assessed pre-construction, during active construction, post-construction, and throughout the lifetime of the Project; provide details on how wildlife data would be evaluated for project-related impacts.
- 5) Provide details on how air quality would be sampled pre-construction, during active construction, post-construction, and throughout the lifetime of the Project; provide details on how air quality data would be evaluated for project-related impacts.
- 6) Provide details on how plant communities would be evaluated and sampled pre-construction, during active construction, post-construction, and throughout the lifetime of the Project; provide details on how plant communities would be evaluated for project-related impacts.
- 7) Provide details on how impacts to wetlands and waterways would be avoided during vegetative clearing from the newly exposed soils and runoff potential.
- 8) Provide details on how the Project's BMP's and erosion control measures would support wildlife migration and crossings.