



Line 5 Wisconsin Segment Relocation Project

**Wisconsin Department of Natural Resources
Storm Water Pollution Prevention Plan
Project Narrative**

June 2021
Revision 2

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List of Acronyms

Name	Description
Bad River Band	Bad River Band of Lake Superior Chippewa Tribe
ECDs	Erosion Control Devices
Enbridge	Enbridge Energy, Limited Partnership
EPP	Environmental Protection Plan
Project	Line 5 Wisconsin Segment Relocation Project
Reservation	Bad River Reservation
ROW	Right-of-way
WDNR	Wisconsin Department of Natural Resources

1.0 PROJECT SUMMARY

Enbridge Energy's ("Enbridge") existing Line 5 pipeline crosses through approximately 12 miles of the Bad River Reservation ("Reservation") of the Bad River Band of Lake Superior Chippewa Tribe ("Bad River Band"). In July 2019, the Bad River Band terminated mediation discussion with Enbridge regarding the renewal of pipeline easement and filed a lawsuit in federal court for the removal of the Line 5 segment from the Reservation. In response to this litigation and discussions with the Bad River Band regarding its preferences for Line 5 to be removed from the Reservation, Enbridge developed the Line 5 Wisconsin Segment Relocation Project ("Project") to reroute the existing Line 5 pipeline. The proposed Project will replace approximately 20 miles of the existing Line 5 pipeline with approximately 41.1 miles of a new pipeline segment located entirely outside the exterior boundaries of the Reservation. Additionally, the Project will include the installation of cathodic protections, AC mitigation facilities, seven mainline block valves, four pipe yards and contractor yards, and minor modifications to the existing Ino Pump station.

1.1 CONSTRUCTION RIGHT-OF-WAY

The Project is located in Ashland, Bayfield, Douglas, and Iron County, Wisconsin. Enbridge proposes to use a 120-foot-wide construction right-of-way ("ROW") to allow for temporary storage of topsoil and spoil as well as accommodate safe operation of construction equipment. To minimize wetland disturbance, Enbridge will reduce the construction ROW to 95-foot-wide in wetlands where practicable based on site-specific conditions. Land disturbance along the construction ROW and the associated temporary workspace will impact approximately **738.9** acres. The ROW and associated temporary workspace will be restored to approximate pre-construction conditions.

1.2 ABOVEGROUND FACILITIES

Enbridge proposes to install seven mainline block valves as part of the Project, each will be approximately **0.13** acre in size and will include an associated access road (see section 1.4). The seven mainline block valves will result in permanent conversion of land use type to approximately **0.9** acre of land. Additionally, Enbridge will make minor modifications to the Ino Pump Station at the existing facility; however, activities at the Ino Pump Station will be within the existing facility fence line. All land affected at the Ino Pump Station is currently impervious industrial land and no increase to impervious area will occur. No other aboveground facilities are required for the Project.

1.3 PIPE STORAGE AND CONTRACTOR YARDS

During construction, Enbridge will temporarily use off-right-of-way areas for pipe and material storage. Additionally, construction contractors will require off-right-of-way contractor yards to park equipment and stage construction activities. Enbridge has identified four pipe yards or contractor yards (totaling approximately 57.9 acres). Enbridge has assessed sensitive environmental features when planning the placement and use of these pipe yards to minimize potential sensitive resource impacts. Enbridge and/or the Contractor will lease the sites and will restore them upon the completion of the Project unless the landowner and applicable agencies otherwise permit or authorize.

1.4 ACCESS ROADS

Enbridge typically uses existing public and private roads to access the ROW and facilities to the extent practicable to limit impacts attributed to construction of new temporary roads. However, Enbridge identified areas where new temporary access roads will be necessary for equipment, material deliveries, and personnel access. Enbridge will obtain applicable landowner and regulatory approvals prior to using

the new access roads. Enbridge may leave newly constructed temporary roads and existing private roads upgraded for use by the Project intact through mutual agreement with the landowner unless otherwise restricted by federal, state, or local regulations. Where temporary access roads are removed, the area will be restored as near as practical to the pre-construction conditions. Enbridge will utilize **91** temporary access roads (approximately **111.8** acres), of which eight will be new or partially new access roads (approximately 4.3 acres). Enbridge will utilize seven permanent access roads (approximately 3.2 acres) associated with the permanent mainline valves, of which six will be new or partially new access roads (approximately 1.9 acres). Existing temporary or permanent access roads may require improvements.

2.0 CONSTRUCTION SCHEDULE

Subject to receipt of required regulatory approvals and permit authorizations, Enbridge proposes to begin construction of the Project in **February** of 2022. Enbridge anticipates the pipeline replacement segment to be connected to the existing Line 5 and to be placed in-service in September of 2022. Table 2.0-1 provides the construction schedule. Enbridge will continue restoration efforts until Project areas have been restored in accordance with permit conditions and landowner agreements.

Total construction impacts will be minimized by performing construction in a linear fashion, to the extent feasible, with each crew moving in sequence/phase. Each construction crew will proceed along the pipeline ROW in one continuous operation from staking to backfilling and final grading. Specialty crews will be used to install select areas including horizontal directional drills, road crossings, and railroad crossings. Each construction process will be coordinated to minimize the total time an individual tract of land is disturbed to the extent practicable.

Table 2.0-1: Construction Schedule

Revised June 2021

Task Name	Start Date	End Date	Duration
Construction ROW Staking	2/9/2022	5/24/2022	15 weeks
Start ROW Clearing	2/10/2022	4/20/2022	10 weeks
Utility Sweeps	2/10/2022	4/20/2022	10 weeks
Access Grading and Site Preparation	2/10/2022	5/11/2022	13 weeks
Rock Blasting	3/1/2022	5/14/2022	11 weeks
Begin Horizontal Directional Drill Crossing	3/1/2022	6/25/2022	17 weeks
Mainline ROW Grading	5/17/2022	7/2/2022	7 weeks
Hauling and Stringing Pipe	5/27/2022	7/14/2022	7 weeks
Facilities Field Work	6/1/2022	8/9/2022	10 weeks
Pipe Bending	6/1/2022	7/19/2022	7 weeks
Welding of Pipe	6/7/2022	7/23/2022	7 weeks
Pipe Coating	6/8/2022	7/26/2022	7 weeks
Ditching	6/14/2022	7/30/2022	7 weeks
Lowering In of Pipe	6/15/2022	7/31/2022	7 weeks
Backfill Ditch	6/16/2022	8/3/2022	7 weeks
ROW Restoration	6/21/2022	11/5/2022	20 weeks
Hydrotesting of Pipe	7/26/2022	8/6/2022	2 weeks
Commissioning and Tie-in	8/4/2022	8/31/2022	4 weeks
In-Service Date	9/1/2022	9/1/2022	--

3.0 EROSION AND SEDIMENT CONTROL

Temporary erosion and sediment control devices (ECDs) will be installed after initial clearing and before soil disturbance at the base of sloped approaches to streams, wetlands, and roads, and in other areas as necessary to prevent sediment transport into sensitive resource areas. Temporary ECDs will also be installed at the edge of the construction ROW as necessary. Temporary erosion control measures will be replaced by permanent erosion controls during final cleanup restoration. All temporary and permanent erosion and sediment control measures will be in accordance with Enbridge's Environmental Protection Plan (EPP), the Wisconsin Department of Natural Resources (WDNR) Storm Water Construction Technical Standards, and applicable permit requirements. ECDs will be inspected, at a minimum, weekly and within 24 hours after every precipitation event that produces 0.5 inch of rain or more during a 24-hour period. Soils map units crossed by this Project are shown on the soil map set included as Attachment 8 of this application. Soil map units and associated soil characteristics crossed by this project are in a table included as Attachment 9 of this application.

3.1 BEST MANAGEMENT PRACTICES

Enbridge will implement, at a minimum, the prescriptive compliance outlined in the WDNR *Construction Site Soil Loss and Sediment Discharge Calculation Guidance* (2019) at all applicable locations to meet the sediment performance standard to discharge no more than 5 tons per acre per year of sediment. Areas along the pipeline ROW and associated facilities less than 1 acre in size and less than 10 percent of the total disturbed area are considered prescriptive compliance areas, and will achieve the WDNR soil loss and sediment discharge standards by implementing erosion and sediment control best management practices. Sediment discharge calculations for Project sites that are not considered a prescriptive compliance area are included as Attachment 3 of this application.

The best management practices related to erosion and sediment control for the project are included in Section 8.0 of Enbridge's EPP, included as Attachment 7 of this application:

Enbridge will prevent or reduce deposition of soil from being tracked onto streets by vehicles exiting the construction workspace by installing stone pads or timber mats at construction entrances. If such BMPs are not adequately preventing sediment tracking onto roadways, street sweeping will be used (see Section 8.0 of the EPP).

Enbridge will prevent or reduce the discharge of sediment from disturbed areas into on-site storm water inlets by installing erosion and sediment control devices prior to ground disturbing activities. Erosion and sediment control devices will be maintained until final stabilization (see Section 8.2 of the EPP).

Enbridge will prevent or reduce the discharge of sediment from disturbed areas into adjacent waters of the state by installing erosion and sediment control devices prior to ground disturbing activities. Erosion and sediment control devices will be installed at the base of sloped approaches to waters of the state and at the edge of the construction workspace to slow the flow of water and reduce discharge of sediments into adjacent waters of the state. Erosion and sediment control devices will be maintained until final stabilization (see Section 8.2 of the EPP).

Enbridge will prevent or reduce the discharge of sediment from drainage ways that flow off site by installing erosion and sediment control devices after clearing and prior to ground disturbing activities. Temporary erosion and sediment control devices will be installed at the edge of the construction workspace, as necessary to slow water leaving the site and reduce discharge of sediments that flow off site. Erosion and sediment control devices will be maintained until final stabilization (see Section 8.2 of the EPP) is achieved.

Enbridge will prevent or reduce discharge of sediment from dewatering activities by preventing sediment uptake from the trench, directing discharges through a filtering device, such as a well-vegetated upland area or straw bale dewatering structure, and managing site-specific discharge settings (see Section 25.1 of the EPP).

Enbridge will prevent or reduce discharge of sediment eroding from soil stockpiles existing for more than 7 days by temporarily stabilizing soil stockpiles or installing perimeter controls. Stabilization methods may include application of temporary seed and/or mulch to soil stockpiles (see section 8.4 of the EPP). Perimeter controls may include silt fence or compost filter sock around soil stockpiles (see Section 8.3 of the EPP). In addition, erosion from stockpiles will be reduced by creating stockpile gaps to allow for natural drainage of ditches, swales, and waterways (see Section 9.0 of the EPP). All other disturbed areas in which construction activities have temporarily paused for more than 14 days will be temporarily stabilized, in accordance with the EPP.

Enbridge will prevent or reduce discharge of sediment from erosive flow at outlets and in downstream channels by minimizing the timeframe of in-stream work activities, designing stream crossings as to minimize channel crossing length, and implementing bank stabilization in unstable soils or site-specific conditions that may require additional restoration efforts (see Section 23 of the EPP). Enbridge will prevent or reduce the transport by runoff into waters of the state of chemicals, cement, and other building compounds and materials by requiring its contractors to implement proper planning and prevention measures to minimize the likelihood of spills, and quickly clean up a spill should one occur. In addition, Enbridge will require project contractors to handle, store, and properly dispose of all hazardous and waste materials generated as a result of the Project. Waste products such as cement wash, waste paints, and blast debris, will be stored in appropriate containers that will minimize the potential for leakage and runoff until the waste can be disposed of off-site (see Sections 12, 28, and 29 of the EPP).

Enbridge does not anticipate vehicle or equipment washing occurring on the proposed construction workspace; however, should it be necessary, Enbridge will require its contractors to contain, store, and properly dispose of all wash water. Enbridge will not discharge untreated wash water from vehicle and wheel washing into waters of the state.

Enbridge's EPP outlines construction-related environmental policies, procedures, and protection measures Enbridge developed as a baseline for construction. Enbridge developed the EPP based on prior experience implementing best management practices during construction, as well as the requirements specified in the Federal Energy Regulatory Commission's Upland Erosion Control, Revegetation, and Maintenance Plan (May 2013 Version) and Wetland and Waterbody Construction and Mitigation Procedures (May 2013 Version). It is intended to meet or exceed federal, state, and local environmental protection and erosion control requirements, specifications, and practices. The EPP addresses typical circumstances that may occur along the Project. Project-specific permit conditions and/or landowner agreements will supersede the general practices described in the EPP. Alternative construction procedures implemented in lieu of this EPP will provide an equal or greater level of protection to the environment, and require advance approval from Enbridge.

4.0 POST CONSTRUCTION STORM WATER MANAGEMENT

Enbridge completed an analysis of the seven mainline valves and their associated permanent access roads to define the applicability of and adhere to NR 151 Post Construction Runoff Management. The *Mainline Valve Site Runoff Management Report* was provided to the WDNR in May 2021 as a supplemental response to the January 7, 2021 Information Request. Based on feedback received from the WDNR and results of the analysis, Enbridge minimized ground disturbance to less than 1 acre and/or designed the project to result

in disconnected impervious surfaces for mainline valves (MLV) 1, 2, 3, 4, 5, and 7. Therefore, post-construction storm water modeling and site evaluation for storm water infiltration are not required.

MLV 6 is subject to the post construction requirements of NR 151.121 to NR 151.124 which include standards for peak flow, infiltration, and total suspended solids. The Project site is designed to meet the code requirements, including the implementation of filter strips and vegetative swales. The site falls under the moderate impervious design criteria based on the intended use being industrial in nature in accordance with NR 151.124. The site design was condensed to the maximum extent practical to conduct operations safely and to minimize the footprint of the developed area.