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Subject: EPA comments on Appendix B-Seed Mixes, of the EPP dated December 2019
Date: Thursday, December 14, 2023 2:57:33 PM
Attachments: [EPA comments-Line 5 WI EPP Appendix B-seed mixes.docx](#)

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Good afternoon,

EPA is providing comments on Appendix B of the EPP for your review and response. Please let me know if you have any questions.

Thank you and be well,

Melissa

EPA comments on *Appendix B-Seed Mixes*, of the Environmental Protection Plan Line 5 Wisconsin Segment: Relocation Project, dated December 2019

Submitted by: Melissa Blankenship and Kathryn Quesnell, EPA

Submitted on: December 14, 2023

Upland Buffer Seed Mix

- 1.) The “Standard Upland Seed Mix” in Table B-1 lacks diversity. Only four species are proposed, all proposed species are grasses, and two species (timothy grass and perennial ryegrass) are non-native. While this mix may be appropriate for disturbed, roadside areas, this is not a suitable mix for less-disturbed, high-quality and/or unique wetland communities that are proposed to be impacted. EPA recommends that the seed mixes be revised to include more diversity and to include native forbs and native graminoids.

Waterbody Banks Seed Mix

- 2.) Scientific names are not provided in the “Waterbody Banks Seed Mix” Table B-4. The applicant only notes that the “common” variety of each species is to be planted. This can create confusion. For example, “March Milkweed” is not a species known to the EPA. EPA recommends the scientific name of each plant be provided in the table to avoid confusion. EPA further recommends all mixes be revised to include the most recent, accurate scientific name. For example, species listed as *Aster* should be *Sympotrichum* or *Doellingeria*, *Verbena hastata* and *Veronica fasciculata* should be *Verbena hastata* and *Vernonia fasciculata*, respectively.
- 3.) 10.9% of the “Waterbody Banks Seed Mix” is non-native annual ryegrass. Slender wheatgrass is proposed as the companion/cover crops for the seed mix, but it is unclear if annual ryegrass is also intended as a cover crop, especially at such a high seeding rate. EPA recommends that annual ryegrass be replaced in the seeding mix with native species.

General Comments on Seed Mixes

- 4.) The composition of the seed mixes proposed does not appear to reflect the wetland communities represented by the project. While conversion from forested wetlands to emergent communities is expected as part of the project, even non-forested communities appear to have very few species in common with the proposed planting lists. For example, wetland “wasc074” is listed as a Sedge Meadow, and only four species found in the Native Sedge/Wet Meadow Mixture and the Native Wet Prairie Mixture were also found within the wetland. EPA recommends that Enbridge revise their seed mixes to better reflect the wetland communities found in far northern Wisconsin. Due to the quality of the wetlands, preservation of local genotypes is paramount. EPA reiterates that Enbridge should provide seed source location and prioritize sources closest to the impact

area. EPA further recommends that any seed substitutions be approved by the regulatory agencies.

- 5.) There is a large diversity of wetlands that will be impacted by this project. If conversion of high-quality and/or unique community types is anticipated for the project, Enbridge should provide further details on the proposed final wetland community types as part of a wetland restoration plan. Enbridge should consider planting an emergent community that compliments the original wetland community when converting wetlands to facilitate ROWs. For example, a coniferous bog should be converted into an open bog instead of a sedge meadow, as would result from the use of the proposed seed mixes. Species in the seed mixes should not drastically change the wetland community in high-quality and/or unique quality wetland community types.