

March 6, 2023

Debra Shore  
Regional Administrator  
& Great Lakes National Program Manager  
US EPA Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604

Tera L. Fong  
Division Director, Water Division  
US EPA Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604

**Re: Enbridge Line 5 Wisconsin Segment Relocation – Enbridge Response to Certain  
EPA Comments and Request for a Meeting with EPA**

Dear Regional Administrator Shore and Division Director Fong:

I am writing on behalf of Enbridge in response to the U.S. Environmental Protection Agency's ("EPA") March 16, 2022 and April 13, 2022 letters to the U.S. Army Corps of Engineers ("Corps") concerning the Enbridge Line 5 Wisconsin Segment Relocation Project ("Relocation" or "Project") and to request a meeting with EPA. Specifically, our team would like to discuss with you our efforts to date to design the Relocation in the least impactful manner to the environment and waters. Extensive information has been gathered and data developed, including on proposed and alternative installation methods for the Project at all water crossings. This information demonstrates that there will be no adverse impacts from the Project on any Aquatic Resources of National Importance ("ARNI"), specifically the Bad River and Kakagon-Bad River Sloughs wetland complex. We have also recently completed modeling of anticipated sedimentation impacts to water quality resulting from installation methods at the Project's proposed water crossings and would like the opportunity to further discuss those modeling results with you. Due to the detailed and very technical nature of this information, we believe that it would be beneficial to present this information to EPA directly during an in-person meeting. We have copied the Corps and the Wisconsin Department of Natural Resources ("WDNR") on this letter, and plan to include them to participate in the meeting.

The specific agenda items that we would like to discuss at an in-person meeting are set forth below. We would also like to discuss our plan to address the comments in EPA's letters that are not identified below.

1. Appropriate Water Crossing Methods: Enbridge has evaluated a variety of different crossing methods depending on the type and characteristics of the waterbody being crossed. The methods Enbridge evaluated are the open-cut (wet-trench), dry crossing (flume or dam-and-pump), horizontal direction drill ("HDD"), and Direct Pipe methods. Each of these methods have their advantages and disadvantages, and each may only be suitable for certain types of waters that are proposed to be crossed by the Project.

Enbridge has identified 12 waterbodies that it proposes to cross via HDD. This includes the White River, Deer Creek, Brunsweller River, Highway 13/UNT Brunsweller River, Trout Brook, Billy Creek, Silver Creek, Krause Creek, Bad River, Tyler Forks, Potato River, and Vaughn Creek. The HDD method is generally used to cross sensitive areas, areas with extended steep banks, or particularly deep, wide, or high-flow waterbodies where the site-specific topography and the local geologic substrate are suitable. Survey work conducted to date by the Project team has confirmed that these 12 waterbodies meet these parameters. Due to the unique geologic and other site conditions at the Marengo River, Enbridge is proposing to utilize an alternative trenchless method, Direct Pipe installation, at the Project's proposed crossing of this waterbody. A Direct Pipe installation is similar to an HDD, but allows the pipe to be installed simultaneously with the tunneling of the bore hole.

ED\_018475D\_00003427-00001

Sierra Club FOIA Request:

2025-EPA-04193

SC\_FOIA\_0001177

The advantages of using the HDD and Direct Pipe installation methods at these locations are that they avoid or reduce construction-caused instream sedimentation; will not cause streambed or bank disturbance; there are no potential streamflow or aquatic species effects; and these methods reduce the amount of required waterbody restoration.

All other crossings, including the 14 listed in EPA's March 16 letter, are much smaller and narrower than the waters described above, and are more suitable to be crossed by trenching methods. Enbridge accordingly proposes to install pipe at all other crossings via trench methods. Such trench methods will allow for pipe installation much more quickly than an HDD, limiting the amount of temporal environmental disturbance (including emissions) resulting from installation activities by equipment and construction crews. Two types of trench methods have been studied by Enbridge: (1) the open-cut (wet trench) method, which involves trenching through the waterbody while water continues to flow across the instream work area; and (2) dam and pump / flume methods, which involve construction of temporary dams to isolate installation activities from a diverted stream flow thereby minimizing downstream sedimentation. Based on Enbridge's comparative analysis, the open-cut method would result in the greatest environmental impact (i.e., downstream sedimentation) due to installation activities occurring directly within the flowing waterway. To avoid such impacts, Enbridge will use the open-cut only when no flow is present at the time of crossing. The dam and pump / flume methods will be used at all crossings where flowing water is present. Because the installation of pipe with a dam and pump / flume method isolates the water from the direct construction activity, impacts to waterbodies crossed via this method will be limited to short-term increased sedimentation. However, this will only occur while the dam is being installed or removed as the stream flow is restored. Also, because trench methods can be completed relatively quickly (as compared to an HDD), construction impacts to non-aquatic resources at all crossings will also be limited in terms of extent and duration.

For all crossing methods, Enbridge will avoid and minimize impacts on waterbodies by implementing the applicable measures described in its Environmental Protection Plan ("EPP"), which can be discussed at the in-person meeting as well.

2. Proposed Crossing Methods for Upstream Crossings of Outstanding Tribal Resource Waters and Outstanding Resource Waters: The Project will cross six waterbodies designated by the Bad River Band as Outstanding Resource Waters ("ORW"): White River, Marengo River, Bear Trap Creek, Brunsweller River, Tyler Forks, and Vaughn Creek. The Project will also cross the Bad River, which has sections within the exterior boundaries of the Reservation designated as both ORW as well as Outstanding Tribal Resource Waters ("OTRW"). Enbridge proposes to cross all Tribal ORW/OTRW waters, with the exception of Bear Trap Creek, using a trenchless crossing technique (HDD or Direct Pipe). Enbridge's use of a trenchless method will avoid direct impacts to existing water quality as there will be no instream construction disturbance or disturbance to the stream banks. Also, the Project will not cross any of these waterbodies within the Bad River Reservation; the closest crossing of a Tribal designated ORW/OTRW waterbody to the Reservation is over 2.4 river miles (3.8 km) upstream of the Reservation boundary.

With respect to the crossing of Bear Trap Creek, based on field observations, it is an intermittent waterbody at the proposed crossing location. Accordingly, Enbridge proposes to cross Bear Trap Creek, at a point located approximately 8.6 river miles (13.8 km) upstream of the Reservation at a time in the year when no flow is present; or if water is present, Enbridge will use a dam and pump / flume method. Use of this method at Bear Trap Creek will limit potential downstream sedimentation impacts to the period of instream construction activities associated with the installation and removal of temporary dams. Enbridge does not propose to cross any flowing ORW/OTRW waterbodies using the open cut (wet trench) crossing technique.

Clearing and maintenance of the pipeline right-of-way will be required (with Enbridge-proposed buffers), but no wetland fill will occur. Enbridge will also avoid and minimize impacts on waterbodies by implementing the applicable measures described in its EPP, as noted above.

3. Potential Effects of the Project on Water Quality: Enbridge has determined that the potential effects of its pipeline installation on water quality would be localized and limited in duration. The primary water quality parameter affected by pipeline installation at the proposed water crossings is the disturbance of streambed sediment resulting in a short-term increase in total suspended solids ("TSS"). To evaluate the potential of the Project to impact water quality, Enbridge commissioned RPS Group ("RPS") to conduct a quantitative assessment of sediment dispersion from planned waterbody crossing activities. The results of RPS' analysis, which are specified in greater detail in the RPS report, indicate that potential increases of TSS concentrations in the water column caused by use of a trench method or an unexpected inadvertent return during an HDD would be localized, limited in duration, result in less TSS levels than storm-related events, and will not degrade water quality or existing designated uses (either the site of the crossing or downstream). Further, due to the limited nature of TSS impacts resulting from pipe installation, no further degradation to the already-impaired waterbodies identified by EPA will occur (Trout Brook Creek, Marengo River, and Bay City Creek).

RPS, for purposes of its modeling, utilized a more conservative (i.e., more protective) calculated representative threshold of 19 mg/L TSS. This 19 mg/L calculated representative threshold is based upon the measured relationship between turbidity and TSS within the Bad River that correlates to the Bad River Band's water quality standard for turbidity within the boundaries of the Reservation. For trench methods, TSS concentrations predicted downstream of the trenched installations (e.g., 500-1,000 m) were on the order of <1 to 30 mg/L for a small watercourse and <1 to 10 mg/L for a medium watercourse. These levels are consistently below background conditions for the anticipated construction period of June-August. By 1,000 m (or 1 km) downstream (which is still well outside the Reservation boundary for all crossings), the predictions of any increase in TSS concentrations will be below the conservative representative calculated threshold of 19 mg/L. This temporary increased TSS concentration at any specific location is expected to dissipate over the course of approximately one day. The limited temporal duration of TSS concentrations ensures that cumulative impacts from crossing installations are also limited.

With respect to crossings that are proposed to be conducted via HDD, TSS impacts would not occur for any pipe that is successfully installed via an HDD method. TSS impacts could, however, occur as a result of an unexpected inadvertent return. As noted above, RPS modelled a potential inadvertent release occurring at the Bad River, which EPA has identified as an ARNI. The effect of a hypothetical inadvertent return would be temporary, of short duration, and confined to a relatively short downstream distance from the crossing. Modeling results indicate that TSS concentrations are expected to decrease quickly – for example, at distances 500-1,000 m downstream, TSS concentrations would be less or similar to background conditions. By 2,000 m (or 2 km) downstream, TSS predictions for all scenarios were below the more conservative representative calculated threshold of 19 mg/L.

Due to the limited nature of the increased TSS concentrations resulting from installation, any potential impacts to aquatic species and their habitat will also be localized, limited in duration, and less than background TSS levels.

4. Compliance with the Bad River Band's Water Quality Standards: The proposed route would cross the various watercourses in the Project area at distances between 2.1 km and 23.9 km (1.3 and 14.9 miles) upstream of the Reservation boundary. All TSS concentrations, as modeled by RPS, are expected to be below the more conservative representative calculated threshold of 19 mg/L by the time any suspended sediments from trenching installations (or an inadvertent return on the Bad

River) reach the downstream Reservation boundary. As noted above, all TSS concentrations are expected to be less than background TSS levels in the waterbodies crossed by pipe installation activities.

While EPA has identified the Bad River as an ARNI, its crossing via HDD will be expected to result in no direct impact; or in the unlikely case of an inadvertent return, the release of drilling fluid into the Bad River would be temporary, isolated, and disperse before reaching the Reservation boundary approximately 12 miles downstream. Sedimentation impacts resulting from pipe installation (whether via dry crossing methods or HDD) are expected to have no impact on the Kakagon-Bad River Sloughs, given that this complex is located within the Reservation boundary approximately 48 miles downstream. Any TSS plumes in waterbodies crossed by the Project are expected to be temporary in any given location and will not pose a permanent impact to downstream waters, whether individually or cumulatively. For example, installation of pipe via a trench method is expected to be completed in 1-2 days at any given crossing and any potential sedimentation impacts are expected to last no more than a day. Accordingly, potential increased TSS concentrations at one waterbody crossing would be expected to subside before TSS impacts at another crossing would result from installation. Also, because: (a) TSS levels are the primary water quality parameter affected by pipeline construction, and (b) TSS levels resulting from construction will not exceed the representative calculated threshold on waters within the Reservation, all other Bad River water quality standards (whether numeric or narrative) will be complied with, and downstream water quality would not be degraded as a result of pipe installation activities occurring outside of the Reservation boundary.

5. Water Quality Monitoring: We are in receipt of EPA's November 14, 2022 comments on Enbridge's proposed Water Quality Monitoring Plan for the Relocation. We appreciate EPA's comments and would like to discuss with you how Enbridge intends to implement its Water Quality Monitoring Plan, including in light of EPA's comments.

The goal of our Water Quality Monitoring Plan is to ensure that the Bad River Band's and State of Wisconsin's water quality standards are maintained throughout pipe installation activities. Prior to construction, Enbridge will collect baseline water quality data from perennial streams that will be crossed by the pipeline centerline during construction of the Project, as well as select intermittent streams (at time when water is present at the time of construction).

Enbridge has identified the following 19 waterbodies and tributaries of waterbodies that will cross upstream of the Bad River Reservation that will be included in the preconstruction water quality sampling program: Beartrap Creek, White River, Marengo River, Brunsweller River, and unnamed tributary to the Brunsweller River, Trout Brook, and unnamed tributary to Trout Brook, Billy Creek, an unnamed tributary to Billy Creek, Silver Creek, three unnamed tributaries to Silver Creek, Bad River, an unnamed tributary to the Bad River, Tyler Forks, Potato River, Vaugh Creek, and an unnamed tributary to Vaugh Creek. Enbridge will collect grab samples at the pipeline crossing location of each of these waterbodies prior to start of the stream crossing (if stream flow is present) as a baseline measurement. These sample will then be analyzed for TSS, turbidity and other factors by a certified laboratory using standard analytical methodologies or through field analysis using standard sample protocols.

Two of the 19 waterbodies listed above are identified under Section 303(d) of the Clean Water Act as impaired: Trout Brook (fecal coliform); and Marengo River (fecal coliform). One additional waterbody crossed by the Project is listed as a Section 303(d) waterbody (Bay City Creek – listed for exceedance of total phosphorus standards); however, this waterbody does not flow into the Bad River Reservation. The tested/monitored water quality parameters will include those described above as well as analysis for the respective impairment to these three waterbodies. Photographs will be taken (upstream, downstream, and across) to document physical conditions at each site.

Additional proposed monitoring protocols are as follows:

- During instream construction, Enbridge will collect water quality samples for analysis of the same parameters from approximately 100 feet upstream and downstream of the crossing where Enbridge has secured landowner permission for off right-of-way access, or will access the sample site from the waterbody where safe stream conditions allow (i.e., depth). Samples will be collected during the installation of the temporary dams and removal of the temporary dams.
  - Following completion of instream construction activities, Enbridge will complete streambank restoration/stabilization and restore natural stream flow through the construction workspace. Enbridge will then collect daily water quality samples for three additional days upstream of the crossing location and downstream of the crossing location at approximately the same locations as the active construction samples. Enbridge will collect additional samples at one-week post construction and one-month post construction.
  - In the event of an in-stream inadvertent return, Enbridge will collect water samples upstream of the crossing location and 100 feet downstream of the inadvertent return location where Enbridge has secured landowner permission for off right-of-way access. Additionally, Enbridge will collect water samples at each public road crossing downstream of the instream inadvertent return location to the boundary of the Bad River Reservation. Samples will be collected from the stream bank where public rights-of-way allow or will be collected from the respective bridge.
6. Wetland Surveys Conducted Using the Wisconsin Wetland Rapid Assessment Methodology ("WRAM"): Field crews evaluated each wetland proposed to be crossed/impacted by the Project using the WRAM. Through this process each wetland was assessed for functional value, floristic integrity, condition assessment of the wetland assessment area and buffer, as well as for potential impacts resulting from Project construction. The floristic integrity assessment was focused on primary questions pertaining to invasive species cover, strata, Natural Heritage Information plant community ranking, and relative frequency of the plant community within the watershed. At the recommendation of the Corps, additional vegetation surveys were conducted during the 2022 field season on select wetlands characterized by the WRAM as moderate to high-quality to further assess the potential impacts of the Project to regional wetland ecosystems. Wetlands classified under the WRAM as "low value" (for example, due to high levels of nonnative species or recent disturbance through agricultural or forest harvest) were not surveyed. Species encountered and associated cover values were collected and then used to calculate two metrics: (i) the Floristic Quality Index ("FQI"); and (ii) the Mean C-value. A total of 73 wetland features were evaluated to determine floristic quality, with nine of these features deemed to have multiple community types. This process took into consideration the FQI component of WRAM for appropriate wetlands. Data gathered through this process (which recorded floristic diversity, quality, and community) can be utilized to assess appropriate mitigation/restoration for the Project.

A key finding of the 2022 surveys was a divergence between the quality of the wetlands as assessed using the calculated FQI versus the quality determined through consideration of the cover-weighted Mean Coefficient of Conservatism ("wC"). That divergence is consistent with the findings of two research reports funded by EPA Region 5 and conducted in Wisconsin over the last decade. The research conducted by Lake Superior Institute in *Northern Lakes and Forests Inland Wetland Surveys: Relationship between Floristic Quality Assessment and Anthropogenic Stressors. Technical Report 2015-2*, Lake Superior Research Institute, University of Wisconsin-Superior, Superior, WI (Hlina, P., N.P. Danz, K. Beaster, D. Anderson S. Hagedorn. 2015) found

this relationship in the Northern Lakes and Forests ecoregion of the state, and a follow-up review covering additional ecosystems titled *Provisional Wetland Floristic Quality Benchmarks for Wetland Monitoring and Assessment in Wisconsin. Final Report to US EPA Region V, Grants # CD00E01576 and #CD00E02075*. A 2019 WDNR report, EGAD # 3200-2020-01 (Marti, A.M. and T.W. Bernthal. 2019), subsequently confirmed this finding statewide:

*Community diversity and the effects of overall cover of individual plant species are captured using wC, resulting in a more ecologically and statistically defensible assessment metric and corresponding set of Benchmark criteria for comparison. Based on these factors, we suggest that wC Benchmark criteria are used as the primary provisional Benchmarks whenever possible when attempting to apply Benchmark criteria for a project.*

Accordingly, use of the wC benchmark criteria (as opposed to exclusively the calculated FQI) was appropriate for assessing wetlands potentially impacted by the Project.

7. Wetland Impacts and Wetland Functional Values: The Project will have minimal impacts on wetlands and the functional values of those wetlands will be maintained. Specifically, the Project will require permanent fill of only approximately 0.019 acres (826 square feet) of emergent wetland and permanent fill of less than 0.004 acre (173 square feet) of scrub-shrub wetland. This fill is unavoidable because it is required to install mainline block valves to comply with mandatory pipeline safety requirements imposed on Enbridge by the Pipeline and Hazardous Materials Safety Administration and the installation of permanent roads to access those mainline block valves. These permanent impacts affect only three low-quality wetlands, which have already been determined during wetland delineation to have invasive flora. In each case, Enbridge will install a permanent culvert beneath the access roads at each location to maintain existing hydrology within the wetland complex. Importantly, all permanent wetland impacts will occur outside of the Reservation and have no impact on the Kakagon-Bad River Sloughs wetland complex located far downstream within the Reservation.

Impacts resulting from installation within or in proximity to wetlands will be avoided to the extent possible, and if unavoidable will be mitigated. The primary impact to wetlands resulting from pipeline construction is the temporary removal of wetland vegetation during active construction and the conversion of forested and shrub-scrub wetland vegetation to emergent wetland vegetation within the permanent right-of-way. To compensate for these impacts, Enbridge has developed a Compensatory Wetland Mitigation Plan that addresses temporal wetland impacts, wetland conversion (e.g., conversion of forested wetland to emergent wetland), and permanent wetland fill. This plan has been reviewed by the Corps. In accordance with that Plan, Enbridge will, to the maximum extent practicable, restore affected wetlands to preconstruction conditions, which is considered in-place compensation. Enbridge will also provide compensatory wetland mitigation for unavoidable Project-related impacts including temporary loss of wetland cover, permanent conversion of wetland type, and permanent wetland fill.

With respect to the conversion of 33.95 acres of forested and scrub-shrub wetlands to emergent wetlands, this is a temporary impact only because wetland function will be maintained. See *Reissuance and Modification of Nationwide Permits: Final Rule*, 86 Fed. Reg. 2744, 2773-2774 (Jan. 13, 2021) ("In areas where temporary fills occur, the wetlands in the right-of-way will remain, although there may be a conversion in wetland type. Those wetlands will continue to perform wetland functions, including hydrologic functions, biogeochemical cycling, and habitat functions, but there may be some changes to those functions and the degree to which the wetlands perform those functions . . . Activities that are authorized by NWP's do not require activity-specific evaluation under the 404(b)(1) Guidelines (see 40 CFR 230.5(b)). Emergent and scrub-shrub wetlands

perform valued wetland functions, even though those functions differ to some degree from the functions performed by forested wetlands.”).

Enbridge has committed to post-construction monitoring of the right-of-way to determine the extent of secondary or indirect impacts, if any. Post-construction monitoring would also: (i) evaluate the effectiveness of wetland restoration efforts; (ii) document overall revegetation success; and (iii) identify areas that may require additional remediation. The post-construction monitoring program will assess quantitatively and/or qualitatively the success of post-construction wetland restoration through documentation of plant cover, plant distribution, and species composition of plant communities in the wetlands impacted by pipeline construction and operation.

To ensure the effectiveness and accuracy of this monitoring, Enbridge completed wetland and waterbody surveys along the Project route and associated work areas to properly characterize (i.e., provide a baseline for wetland) floristic quality. Enbridge also completed additional vegetation surveys in certain select “medium” and “high” quality wetlands. Based on the survey information, Enbridge calculated a weighted floristic quality index value for each wetland/wetland community and a weighted Coefficient of Conservatism value. Post-construction wetland monitoring will ensure that these wetland values are maintained following completion of the project.

Further, because the Project will result in the direct fill of only 0.02 acres of wetland, construction will not adversely affect storm and/or floodwater capacity in any of the wetlands crossed by the Project. Nor will construction adversely affect the ability of crossed wetlands to moderate water level fluctuation extremes. The limited volume of fill will, in other words, allow the same volume of discharge/recharge of groundwater and/or surface water to wetlands.

8. Blasting Activities and Impacts: Blasting and its potential impacts will be limited. Enbridge anticipates that blasting may be required for installation of the pipe only in locations where bedrock is present at or within the trench depth. Blasting is a preferable means for constructing through bedrock at certain locations because the use of mechanical means would: (1) increase the duration of rock removal noise impacts at a given location from seconds (for blasting) to days or weeks; (2) increase the duration of vibration impacts; (3) increase the overall construction duration resulting in a longer period between initial ground disturbance and final restoration; and (4) increase equipment air emissions due to the extended work duration and additional equipment needs.

Potential pipeline related blasting impacts, such as changes in water levels and/or turbidity in shallow aquifers, are anticipated to be localized and temporary because water levels will quickly re-establish equilibrium and turbidity levels will rapidly subside following blasting, trenching, pipeline installation, and backfilling. Enbridge will avoid or minimize groundwater impacts by implementing construction techniques described in its construction and restoration plans, such as using temporary and permanent trench plugs. Following construction, Enbridge will also restore the ground surface to original contours as closely as practicable and restore vegetation on the right-of-way to establish surface drainage and recharge conditions as closely as possible to those prior to construction.

For flowing waterbody crossings that may require blasting due to shallow bedrock, Enbridge will initiate the dry crossing method (i.e., dam and pump) prior to blasting to isolate the workspace and blasting area from natural streamflow. Installation of the temporary instream dams is expected to disperse mobile aquatic organisms away from the crossing area before the blast is conducted and minimize propagation of the blast energy. For waterbody blasts, as for all blasting, Enbridge will use only specialized trench-blasting explosives that do not contain perchlorate or ammonium nitrate fuel oil to avoid the discharge of remnant residues into the waterbody.

For small, non-flowing waterbody crossings and waterbodies that are dry at the time of construction and are located in areas of shallow bedrock, Enbridge proposes to install temporary upstream and downstream dams to isolate the area of excavation/blasting prior to blasting as a proactive method to minimize the potential for downstream sediment migration should the waterbody begin to flow following blasting and prior to instream construction. Enbridge will initiate the open-cut crossing method within five days following blasting. Enbridge will have equipment and materials on site ready to initiate a dry crossing technique should the stream begin to flow following blasting. Prior to backfilling, Enbridge will install trench breakers within the adjacent upland area (location to be based on site-specific conditions) to prevent subsurface flow of water (either from the waterbody or to the waterbody). The bed and banks of each waterbody will be restored as near as practicable to preconstruction conditions prior to removal of the upstream and downstream temporary dams. Enbridge will seed the disturbed areas of the stream bank and install erosion blankets above the ordinary high-water mark to minimize potential bank erosion.

Where in-stream blasting would be conducted, the waterbody substrate would be restored to natural grade after pipe installation is complete in accordance with the EPP. Enbridge will also conduct post-construction monitoring, including monitoring crossed waterbodies annually for five years to identify potential additional reclamation measures. Wetlands will also be monitored to evaluate the success of wetland revegetation to identify any additional restoration or reclamation activities that might be needed.

We look forward to meeting with you and your colleagues at your earliest convenience. Please provide me with EPA's availability for a meeting in Chicago, and I will coordinate with the Corps and WDNR to find a date that works for all parties.

Please also let me know if you would like any further information or have any questions that we could answer to help facilitate our discussion at our meeting. We, like EPA, remain committed to continuing to work diligently through a collaborative process to address your concerns.

I look forward to hearing from you.

Sincerely,



Lisa Connolly  
Director, Environment Projects

cc:

David Pfeifer, Manager, U.S. EPA, Watersheds and Wetlands Branch  
Kerryann Weaver, U.S. EPA, Wetland Section Supervisor  
Melissa Blankenship, U.S. EPA, Environmental Scientist  
Jennifer Tyler, U.S. EPA, NEPA Coordinator  
Bill Sande, U.S. Army Corps of Engineers, Lead Project Manager  
Rebecca Graser, U.S. Army Corps of Engineers, Deputy Regulatory Division Chief  
Ben Callan, Wisconsin Department of Natural Resources, NR Program Manager