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Public Service Commission of Wisconsin  
 RECEIVED: 3/7/2024 3:40:56 PM

March 7, 2024

Mr. Cru Stublely  
 Executive Secretary  
 Public Service Commission of Wisconsin  
 4822 Madison Yards Way  
 Post Office Box 7854  
 Madison, WI 53707-7854

Re: Application of Wisconsin Electric Power Company, as an Electric Public Utility, for Authority to Construct a New Service Center in West Bend, Washington County, Wisconsin – Docket No. 6630-CU-XXX

Dear Mr. Stublely,

Pursuant to § 196.49, Wis. Stats., and §§ PSC 112.05 and 133.03, Wis. Admin. Code, Wisconsin Electric Power Company, doing business as We Energies (“the Company” or “Applicant”) applies for authority to construct and place in utility service a new building to be known as the West Bend Service Center (“WBSC”). The new service center will be located in the City of West Bend (“City”), Washington County, Wisconsin and will replace the existing “WBSC” located in West Bend, Wisconsin and the Port Washington Service Center (“PWSC”) located in Port Washington, Wisconsin. This Application presents the details of the project in the format following the application filing requirements for municipal electric projects.

## 1. PROJECT OVERVIEW

### Proposed WBSC

The proposed WBSC will allow Applicant to consolidate the operations and service areas of existing WBSC and PWSC to improve customer service and gain operating efficiencies. WBSC will be an approximately 60,000 square foot single story building located on a 19.5-acre parcel in the City. The proposed service center will be comprised of an office (16,656 square feet), warehouse (8,829 square feet), fleet maintenance area (5,473 square feet) and vehicle storage area (29,073 square feet). The yard will provide storage for additional materials and vehicles. The proposed service center is sized to accommodate all staffing and necessary electric and gas functions and operations well into the foreseeable future; and will be located approximately 4 miles north of existing WBSC and 15 miles west of PWSC. The facility will be in compliance with current Americans with Disabilities Act (“ADA”) standards.

### Existing WBSC

The existing WBSC currently supports the services provided to over 55,000 electric and gas customers in an 859 square mile service area located in southeastern Wisconsin. The existing WBSC provides electric and gas emergency response, facility maintenance and new service installation with 60 employees representing electric and gas field crews, customer service, fleet maintenance, supply chain and right of way personnel.

The existing 37,978 square foot service center was originally constructed in 1966. Neither the garage nor the building have undergone a significant renovation or expansion since original construction. The building does not comply with current ADA standards. A recent assessment noted the entire building is due for a complete overhaul; mechanical, electrical, and plumbing (“MEP”) systems are at or beyond their useful life; and the overall building is in poor condition. The garage is too small to house the modern fleet vehicles and equipment and has an overhead door clearance insufficient to accommodate many of the modern line trucks.

Furthermore, the existing WBSC site is adjacent to a growing residential community, which introduces unnecessary safety risks. The City of West Bend has created a new Tax Increment District number sixteen (“TID 16”) which includes the existing WBSC property. A large development plan is moving forward for an assisted living/elderly independent housing development on the property immediately south of the existing WBSC. Future plans of the City include additional residential development on the property immediately to the north of the WBSC. These conditions present considerable challenges when considering the future of operations at this site and substantially impairs, if not outright negates, the viability of remodeling and/or expanding the existing facility to better meet WBSC’s operational needs.

### Existing PWSC

The existing PWSC supports the services provided to over 44,000 electric and gas customers in an 347 square mile service area located in southeastern Wisconsin. The existing PWSC provides electric and gas emergency response, system maintenance and new service installation with 33 employees representing electric and gas field crews, customer service, fleet maintenance and supply chain.

This 30,382 square foot service center was originally constructed in 1993. Neither the garage nor the building have undergone a significant renovation or expansion since original construction. The building’s MEP systems are nearing the end of their useful life, the building does not meet ADA standards and finishes are worn and dated. The site and the building are sufficiently sized such that improvements could be made to make this service center more functional and efficient. However, the cost

to customers associated with such an investment is disproportionate, and greater, when compared to the the benefits of building the proposed WBSC and consolidating operations with the existing WBSC and the existing PWSC.

**1.1. Describe the location of the proposed project sites and routes.**

The Project Site will be located on Trenton Road, just south of Wisconsin State Highway 33 West, in the City of West Bend, WI. It is comprised of (3) parcels: 2595 Wingate Street (Parcel A, Lot 1, Block 2, 11.772 acres), 2770 Wingate Street (Parcel B, Lot 3, 5.7 acres) and 245-253 Stockhausen Lane (Lot 1, 2 acres). The legal descriptions of the parcels are as follows:

- Parcel A, Lot 1, Block 2 (Tax Key Number: 291-11201810210 / Tax ID: 11201810020): “being part of the Northeast 1/4 and Northwest 1/4 and part of Government Lots 1 and 2, all in Section 18, Town 11 North, Range 20 East, City of West Bend, County of Washington, State of Wisconsin, and corrected by Affidavit of Correction recorded June 14, 2002”. “EXCEPTING THEREFROM Certified Surey Map No, 5787, recorded in the Washington County Registry on September 15, 2004 in Volume 42 of Certified Survey Maps, Pages 173-176”.
- Parcel B, Lot 3 (Tax Key Number: 291-11201810020 / Tax ID: 11201810210): “of Certified Survey Map No. 6665, recorded in the office of the Register of Deed for Washington County, Wisconsin, on February 2, 2016 in Volume 51 of Certified Survey Maps, at Page 93-96”, “being a redivision of Part of Lot 2, Block 1, in the Northeast 1/4 of Section 18, Town 11 North, Range 20 East, in the City of West Bend, County of Washington, Sate of Wisconsin”.
- Lot 1 (Tax Key Number 291-11201810015 / Tax ID: 11201810015): “of Certified Survey Map No. 6248, recorded in the Washington County Registry on July 2, 2008 in volume 47 of Certified Survey Maps, pages 22-23, “being a part of the Northeast 1/4 of the Northeast 1/4, and part of the Northwest 1/4 of the Northeast 1/4, all in Section 18, Town 11 North, Range 20 East, and being a division of a portion of Lot 2 of Block 1 of Wingate Creek Business Center, in the City of West Bend, County of Washington, State of Wisconsin.

See **Attachments 1, 2 and 3.**

- **Attachment 1 – Project Location Map**
- **Attachment 2 – Parcels Map**
- **Attachment 3 – Project Site Relative to WBSC and PWSC**

**1.2. Identify what sites or easements would need to be acquired. State whether condemnation could be used to acquire these sites and easements. State whether a purchase agreement has already been negotiated with the site owner.**

Applicant will acquire an approximately 19.5-acre parcel on Trenton Road in West Bend, Wisconsin as a part of this project. Purchase and Sale Agreements (“PSA’s”), titled Option Agreements, for the Applicant to acquire the identified parcels from Ziegler/Bence West Bend, LLC and Stockhausen Business Center LLC (current land owners) has been negotiated and an executed contract is in place. The Option Agreements entails a lengthy due diligence period with contingencies to allow for Public Service Commission of Wisconsin (“PSCW”) review, consideration and approval of this Application prior to Applicant closing on the purchase of the parcel. See **Attachments 4 (Stockhausen Fully Executed PSA) and 5 (Ziegler & Bence Fully Executed PSA).**

Easements are included on two drafted ALTA’s, see **Attachments 6 (Easement/Alta #1) and 7 (Easement/Alta #2).**

**1.3. Provide the city, village and/or township and counties of the proposed project and any other areas of proposed construction activities.**

The Project Site is located within the City of West Bend, Washington County.

**1.4. PSC Review**

*1.4.1. Identify the expected type of Commission action under Wis. Admin Code § PSC 4.10.*

Pursuant to § PSC 4.10(3), Wis. Admin. Code, the proposed project is categorized as a Type III action, and therefore does not require an Environmental Assessment or an Environmental Impact Statement. The area affected by this project is currently in the Wingate Creek Business Center. Environmental details are provided in Sections 6, 7 and 8 of this Application. In summary:

- There are no rivers, streams, forest lands, woodland or historical resources on the Project Site. Two wetlands were identified within

the Project Site and have been deemed artificial by WDNR staff on July 7, 2023 and determined not to be subjected to U.S. Army Corps of Engineers (USACE) jurisdiction on December 7, 2023 (see Applicant's response to 7.2.). One archeological site has been identified on the Project Site and no further investigation of the site is recommended (see Applicant's response to 6.4.).

- The Project Site is approximately 480 feet from a 100-year floodplain, however no alterations or grade changes will occur within the floodplain as a result of this project. See **Attachment 8 (Flood Hazard Map)**.
- No waterways are present within the Project Site.
- The Company is exempt from the requirement to prepare an agricultural impact statement ("AIS") for the Project Site.

1.4.2. *Discuss if the proposed project is contingent or part of a transmission substation, or generation project under another docket.*

The proposed project is not contingent on or a part of a transmission substation or generation project under another docket.

## **1.5. Project Details and Project Area Information**

*Provide descriptions of the project area(s) including the following:*

1.5.1. *Generalized description of the project area, including land cover and zoning.*

The Project Site consists of an approximately 19.5-acre parcel situated in the Wingate Creek Business Center. Of this total parcel, approximately 13 acres are in between Trenton Road (East) and Stockhausen (West), and the remaining 5.7 acres are in the southwest corner of the Business Center. The Project Site is currently zoned as M-2 Industrial District and B-1 Community Business District.

See **Attachments 9, 10 and 11.**

- **Attachment 9 – Wetlands and Waterways**

- **Attachment 10 – Project Site Vicinity**
- **Attachment 11 – Site Topography**

1.5.2. *Special or unique natural or cultural resources in the project area.*

There are no unique natural or cultural resources on the Project Site. A cultural resource investigation has been completed within the project site and the results detailed in a report provided in **Attachment 21 (Confidential Cultural Resource Review)**. One archaeological site was identified within the Project Site and is not recommended for additional investigation. (See Applicant’s response to 6.4)

1.5.3. *Areas of residential concentrations and urban centers in the project area.*

The Project Site is located in the northeast area of the City, a community with a population of approximately 32,000. The Project Site is within Wingate Creek Business Center, one of the City’s newest industrial parks. The borders include the following: to the northwest is a Piggly Wiggly grocery store, to the west is Culligan of West Bend, to the southeast is the Comar West Bend Plant, to the east is Americraft of West Bend and to the northeast is a BP gas station and a Valvoline Oil Change Center. Residential parcels are in the vicinity of the Project Site; however, they are buffered by the grocery store and Highway 33.

**1.6. Other Agency Correspondence/Permits/Approvals**

1.6.1. *Provide copies of all official correspondence between the applicant and all state, federal, and local government agencies.*

See **Attachments 4, 5, 28, 29, 30 and 31.**

- **Attachment 4 – Stockhausen Fully Executed PSA**
- **Attachment 5 – Ziegler & Bence Fully Executed PSA**
- **Attachment 28 – Wetland Delineation Concurrence**
- **Attachment 29 – WDNR Artificial Wetland Exemption Determination**
- **Attachment 30 – Endangered Resources Review Correspondence**

- **Attachment 31 – USACE Jurisdictional Determination Correspondence**

Applicant will supplement this response as applicable while the Application is under review.

- 1.6.2. *Provide a list of all state and federal permits/approvals that would be required for this project and their status.*

Applicant will obtain all permits, variances and approvals required for this project, including, but not limited to, Wisconsin Department of Safety and Professional Services (DSPA) commercial building and plumbing permits; Wisconsin Department of Natural Resources (WDNR) construction storm water and erosion control permit; and City building, construction zoning, street opening and plan review permits as required. To date, the only permit obtained is from the Wisconsin Department of Natural Resources (WDNR) for the artificial wetland exemption.

- 1.6.3. *Provide a list of all local permits and/or ordinances that apply to the proposed project and the status of those permits.*

See Applicant's response to 1.6.2.

- 1.6.4. *If any portion of the associated facilities would occupy property or easements owned by railroad or pipeline companies or the WisDOT, provide documentation from these entities that the sharing is acceptable to the entity, if possible.*

ANR Pipeline possesses an easement that runs North to South on the West side of the primary parcel as depicted on the Alta survey, see **Attachments 6 (Easement/Alta #1) and 7 (Easement/Alta #2)**. The improvements have been designed to limit development over the easement to site circulation.

## **1.7. Construction Schedule**

- 1.7.1. *Provide the anticipated general construction schedule, identifying any potential seasonal or regulatory construction constraints.*

Site work and construction are planned to begin in October 2025 pending Commission approval, with anticipated completion and occupancy by December 2026. Key project milestones are outlined below:

- January 2024: Submit application
- November 2024: PSCW approval
- May 2025: Bid project
- June 2025: Award contracts
- June 2025: Permitting
- October 2025: Commence site work and construction
- November 2026: Complete construction
- December 2026: Relocate consolidated operations from WBSC and PWSC

The existing WBSC and PWSC sites will remain operational until the new WBSC construction is complete and occupancy is granted, at which time operations will be relocated and consolidated.

1.7.2. *Generally discuss any generation or transmission outage constraints that may have to be accommodated.*

This project does not include any generation or transmission facilities in its scope.

## **1.8. Project Area Maps**

1.8.1. *Provide project maps that use the best and more recent data available. Maps must clearly portray the project in a format and scale that is unambiguous and easy to understand. Labels and symbology used on the maps must be clearly visible. The scale of the maps, the number of map sets necessary to show all relevant data, and whether they will be submitted electronically or on paper will be discussed during pre-application consultations.*

- *Aerial imagery not more than three years old*
- *Project Data*
  - o *Proposed substation, if any*
  - o *Proposed substation fenced area*



- o *Proposed access roads*
- o *Proposed electric poles (distribution and transmission) outside of the fenced area*
- o *Proposed new or altered distribution and transmission right-of-way (ROW)*
- o *Proposed associated facilities and features including storm water retention ponds*
- *Project Area Environmental Data*
  - o *Rivers, lakes, and other waterways*
  - o *Wetlands*
  - o *Soils*
  - o *NHI rare species occurrences (confidential)*
  - o *Topographic maps*
  - o *Floodplains*
- *Parcel Data Adjacent to the Proposed Site/Routes*
  - o *Private properties.*
  - o *Public properties (symbolized differently than private properties)*
  - o *Tribal or other types of properties*
  - o *Political subdivision boundaries*
  - o *Township, range, section divisions*
- *Land Use Within 500 Feet of the Proposed Site/Routes*
  - o *Land cover*
  - o *Zoning*
  - o *Active mines and quarries*
  - o *Sensitive sites (for example daycare centers, schools, hospitals, cemeteries, etc.)*
  - o *Airports, airstrips (public and private) within one mile*
  - o *Recreation areas, trails*
- *Utility/Infrastructure Data*

- o *Roads, highways, interstates*
- o *Existing transmission, distribution, pipelines, and other applicable infrastructure*
- o *Existing distribution lines that would be modified or relocated due to the proposed project or are in the project area*
- o *Applicable infrastructure ROWs (e.g., DOT, pipeline, electric distribution, electric transmission, railroad, trail)*
- *DNR-required information such as locations of possible Chapter 30 activities (e.g., grading, riprap), temporary clear span bridges, Wisconsin Wetland Inventory, wetland/waterway field data, hydric soils, etc.*

See **Attachments 1, 2, 8, 9, 10, 11, 13 and 22.**

- o **Attachment 1 – Project Location Map**
- o **Attachment 2 – Parcels Map**
- o **Attachment 8 – Flood Hazard Map**
- o **Attachment 9 – Wetlands and Waterways**
- o **Attachment 10 – Project Site Vicinity**
- o **Attachment 11 – Site Topography**
- o **Attachment 13 – Utility/Infrastructure Data**
- o **Attachment 22 – Endangered Resources Review**

## **2. ENGINEERING**

### **2.1. Project Need**

The deficient condition of the existing WBSC paired with the creation of Tax Incremental District number sixteen (“TID #16”) necessitated considering building a new service center elsewhere. The existing WBSC sits square in the center of “TID #16” which is surrounded by residential and is within a landlocked nature. The plans for the adjacent parcels in “TID #16” include future assisted living, commercial and recreational use. Ultimately road restrictions are forthcoming which will make path of travel difficult, there is no room for growth on the site and the service center will need to move in the near future per discussions with the City of West Bend. Evaluations were performed and it was determined that a consolidation of the two service centers is desired. See **Attachment 12 (The City of West Bend TID #16).**

While the existing PWSC's site is sufficiently sized for its operations, the service center has MEP systems that are at the end of their useful life. Addressing PWSC's needs would require significant investment and a replacement for the existing WBSC will still need to be constructed on a new site in West Bend. Consolidating the two service centers became a logical and cost-effective solution, providing operational efficiencies and cost reductions for customers, while maintaining customer service.

The proposed WBSC and consolidating its operations with the existing PWSC will maintain customer service, reduce operating costs, maximize resource and operating efficiencies and prioritize safety. More specifically, this project will:

- Consolidate employee resources from WBSC and PWSC
  - Improving crew coverage of absences (vacation, rest, illness, etc.) reducing job cancellations or needs to reschedule work with customers
  - Increasing pool of on-call employees, reducing the potential for on-call employee burnout and fatigue
- Enable indoor parking of fleet
  - Eliminating safety hazards associated with clearing snow and ice from line trucks and equipment stored outdoors prior to use
  - Improving response times, particularly of diesel-fueled equipment due to reduced warming requirements during cold weather months
- Provide a new service center
  - That remains close in proximity to customer base
  - That is ADA compliant
  - Eliminating on-going capital and operations and maintenance ("O&M") expenses associated with maintaining two aged service centers, both with MEP systems at the end of useful life
- Consolidate operations
  - Reducing collective material inventory
  - Reducing supply chain cost of stocking two separate yards
  - Eliminating duplicated costs of lawn maintenance, landscaping, snow removal, and similar services

## **2.2. Area Load Information**

Taking into account the nature of the proposed project, load information is inapplicable.

### **2.3. Equipment Outage Information**

Taking into account the nature of the proposed project, equipment outage information is inapplicable.

### **2.4. Discuss no-build options and their potential electrical supply and environmental impacts. In addition, discuss other possible project alternatives that were considered and the reasons as to why they were rejected.**

Several alternatives to the proposed project were considered and determined to be inferior, as outlined below:

- **Make no changes:** Leave WBSC and PWSC in their current state, maintaining separate operations at the existing sites with no significant capital improvements. This alternative would result in continued inefficient operations with the deficiencies identified in previous sections of this Application. There would be no environmental impacts to wetlands, waterways and historical or archaeological resources. The preliminary cost estimate for this alternative is approximately \$7.21 million in capital renewal costs (\$4.12 million for the existing WBSC and \$3.09 million for the existing PWSC) for the two sites over the next five years. This option would also not result in the O&M cost savings discussed above, which amount to an estimated \$0 annually.
- **Renovate existing WBSC and PWSC:** Renovating both the existing WBSC and PWSC at their current locations would result in maintaining separate service areas and operations and eliminating the cost savings from consolidations. The risks associated with this alternative include West Bend's creation of TID #16 whereas we are directly in the center of it, not conforming to West Bend's long term plan and a potential protracted legal battle with the City. There would be no environmental impacts to wetlands, waterways and historical or archaeological resources. The preliminary cost estimate for this alternative is approximately \$21.6 million in capital renewal costs (\$13 million for the existing WBSC and \$8.6 million for the existing PWSC). This option would also not result in the O&M cost savings discussed above, which amount to an estimated \$0 annually.
- **Build a new WBSC and remodel the existing PWSC:** Build a new 43,102 square foot WBSC in the West Bend area; decommission the existing WBSC;

and remodel the existing PWSC, reconfiguring the floorplan to support operations, replacing aged building systems and addressing known deficiencies. This alternative would provide improved functionality at both the new WBSC and existing PWSC, but would not achieve the efficiencies associated with consolidating operations. Assuming the new WBSC would be constructed on the Wingate Business Center property, the environmental impacts would remain the same as the proposed Consolidation Project. There would not be any additional environmental impacts occurring from renovating the existing PWSC. The preliminary cost estimate for this alternative is approximately \$32.4 million in capital renewal costs (\$23.8 million for WBSC and \$8.6 million for PWSC). This option would also not result in the O&M cost savings discussed above, which amount to an estimated \$0 annually.

The proposed project compares favorably to each of these alternatives and was selected as the most reasonable, cost-effective means of addressing current operating conditions at WBSC and PWSC.

	Capital	Annual O&M Savings
Make no changes	\$7.21M	\$0
Renovate WBSC and PWSC	\$21.6M	\$0
Relocate and Build New WBSC	\$32.4M	\$0
Consolidate WBSC and PWSC	\$34.3M	\$110K

**2.5. Provide an analysis of the ability of energy conservation and efficiency and load response to reduce, alter, or eliminate the need for the proposed project.**

2.5.1. *A description of the energy conservation and efficiency and load response programs and services available to customers in the project area.*

The proposed project does not involve generation, transmission, or distribution, so energy conservation, efficiency or load response efforts would not affect the need for the project. As such, this requirement is inapplicable.

2.5.2. *An indication of the amount of additional energy efficiency and demand response, not already included in the demand forecast, needed to reduce, alter, or eliminate the need for the proposed project.*

See Applicant's response to 2.5.1.

2.5.3. *A discussion of the feasibility of achieving the level of energy efficiency and demand response identified in Section 2.4.2.*

See Applicant's response to 2.5.1.

**2.6. Discuss the potential for alternative solutions to the identified problem, as prioritized in Wis. Stat. §§ 1.12(4) and 196.025(1)(ar).**

2.6.1. *Noncombustible renewable energy resources*

Taking into account the nature of the proposed project, noncombustible renewable energy resources is inapplicable.

2.6.2. *Combustible renewable energy resources*

Taking into account the nature of the proposed project, combustible renewable energy resources is inapplicable.

2.6.3. *Nonrenewable combustible energy resources in the following order:*

2.6.3.1. *Natural gas*

Taking into account the nature of the proposed project, this is inapplicable.

2.6.3.2. *Oil or coal with a sulphur content of less than 1%*

Taking into account the nature of the proposed project, this is inapplicable.

2.6.3.3. *All other carbon-based fuels*

Taking into account the nature of the proposed project, this is inapplicable.

**3. PROJECT COSTS**

Cost tables should be based on the projected in-service year of the project. Tables must be submitted in a Microsoft Excel format, in addition to Adobe Acrobat format. In addition, include the projected annual revenue requirement impact resulting from constructing the proposed project. In the filing, provide both the nominal impact to the revenue requirements and the percentage impact to revenue requirements as a result of constructing the proposed project.

See **Attachment 14 (PC Econ)**.

**3.1. Construction Route Cost Estimate Table**

Applicant estimates the total cost of the project will be \$34,308,403 as detailed below. The cost estimates are expressed in year-of-occurrence dollars.

3.1.1. Material Costs (Capital Spend):

Structures and Improvements / Communication Equipment –  
\$31,450,215

Office Furniture – \$1,281,763

Land Purchase – \$1,338,889

3.1.2. Labor costs: **Included in 3.1.1**

3.1.3. Other costs: **Included in 3.1.1**

3.1.4. Pre-certification costs: Not Applicable

3.1.5. Operation and maintenance costs: \$237,536 Annually

3.1.6. Removal costs and salvage value: Not Applicable

See **Attachment 15 (PC Estimates Financial Calculations)** for additional detail on project costs broken into their respective plant accounts.

#### **4. SITE AND CONSTRUCTION INFORMATION**

##### **4.1. Provide descriptions, diagrams, and graphics for the proposed project.**

The project scope involves developing an approximately 19.5-acre West Bend site within an existing industrial park and constructing an approximately 60,000 square foot service center. The proposed service center will consist of office, warehouse, fleet maintenance and vehicle storage garage areas. The Project Site will also include an outdoor storage yard area, fleet storage and employee parking.

The proposed West Bend Project Site is situated in an industrial park that has previously constructed a regional detention basin which will receive the storm water run-off from the proposed development.

See **Attachments 2, 4, 5, 10, 16, 17, 18, and 19.**

- **Attachment 2 – Parcels Map**
- **Attachment 4 – Stockhausen Fully Executed PSA**
- **Attachment 5 – Ziegler & Bence Fully Executed PSA**
- **Attachment 6 – Ziegler Bence ALTA Lot 2 and Lot 3**
- **Attachment 7 – Stockhausen ALTA Lot 1**
- **Attachment 10 – Project Site Vicinity**
- **Attachment 16 – Architectural Rendering #1**
- **Attachment 17 – Architectural Rendering #2**
- **Attachment 18 – Floor Plan**
- **Attachment 19 – Architectural Site Plan**
- **Attachment 33 – Wingate Creek Business Center Map**
- **Attachment 34 – Declaration of Restrictions for Wingate Creek Business Center**
- **Attachment 35 – Amendment to Declaration of Restrictions for Wingate Creek Business Center**
- **Attachment 36 – Second Amendment to Declaration of Restrictions for Wingate Creek Business Center**

4.1.1. *The location, size, and dimensions of the proposed facilities, access roads, detention ponds, and associated facilities.*

See Applicant's response to 4.1.



4.1.2. *The topography, land cover, zoning, and land use of the proposed site(s).*

See Applicant's response to 1.5.1.

4.1.3. *Layout of the proposed substation equipment (if applicable).*

This project does not include substation equipment.

4.1.4. *Dimensions of the property boundaries and substation fenced area (if applicable).*

See Applicant's response to 4.1.3.

4.1.5. *Vertical profile and topography of the proposed substation and property (if applicable).*

See Applicant's response to 4.1.3.

**4.2. For any electric structures or lines that would be constructed, including the following:**

4.2.1. *Electric line configuration (such as single-circuit or double-circuit with existing line, overhead or underground, conductor replacement or new construction, etc.).*

This project scope does not include the construction of electric structures or lines.

4.2.2. *A description and location of the proposed ROWs (for example new ROW, partially overlapping existing transmission ROW, completely within existing ROW, etc.).*

See Applicant's response to 4.2.1.

**4.3. Describe the construction impacts of the proposed project and any proposed associated facilities including:**

4.3.1. *The area and depth of excavations.*

The new facilities will have standard four foot deep footings while the depressed loading dock footings will be eight feet deep. Site utilities remain to be designed, but are expected to have connection inverts within twelve feet of the existing grade. Care will be taken to maintain grade above the existing interstate pipeline-owned natural gas transmission line easement.

4.3.2. *The type of construction machinery that would be used.*

For the development of the Project Site and construction of the service center, typical building construction equipment will be used, i.e., dump trucks, backhoes, excavators, bulldozers, front end loaders, skid steers, tele handlers, asphalt pavers and cranes.

4.3.3. *The construction disturbance zone, including access from public roads.*

The construction disturbance zone will be on Applicant's property with access from Trenton Road and Stockhausen Lane. Utility connections are anticipated along the eastern and southern property lines. Storm sewer will tie into the existing storm sewer system and run to the existing regional detention basin.

Construction activity will be regulated by the City building permit requirements, including:

*Hours of construction:* Applicant will operate within the permitted parameters published by the City of West Bend, WI.

*Traffic:* Temporary lane closures due to construction activity as allowed by permit.

*Erosion control and storm water runoff protection:* Applicant will abide by WDNR technical standards for BMP that will be implemented during construction.

*Site access:* Applicant will access the Project Site from Trenton Road and Stockhausen Lane.

4.3.4. *How spoil materials would be managed on and off-site.*

Spoils will be removed by Applicant's excavation contractor and disposed of off-site, as required by permits.

4.3.5. *For any distribution electric lines proposed to be constructed, provide the following:*

4.3.5.1 *Construction methods for the electric lines.*

This projects scope does not include the construction of electric distribution lines.

4.3.5.2 *A description of any unique construction methods (e.g., directional boring, jack and bore, helicopter, vibratory caissons, etc.)*

See Applicant's response to 4.3.5.1.

**4.4. For building projects, information on energy efficiency, or conservation features, including:**

Applicant is proposing an energy efficient and sustainable facility. A full description of anticipated energy usage, source, and conservation features is included in **Attachment 20 (Energy Data Sheet)**.

4.4.1. *The whole building heat loss in Btu/square foot of the building envelope.*

Refer to "Building Envelope Heat Gain/Loss" in **Attachment 20 (Energy Data Sheet)**.

4.4.2. *The type and R-value of insulating material used for walls, ceilings, roofs, doors, and windows.*

Refer to "Building Envelope Insulation" in **Attachment 20 (Energy Data Sheet)**.

4.4.3. *The type of heating and cooling system selected and the annual end-use energy estimate in Btu/square foot/year for space heating, space cooling, and any process use.*

Refer to "HVAC System" and "System Design Specifications" in **Attachment 20 (Energy Data Sheet)**.

4.4.4. *The type and source of fuel or fuels selected.*

Natural gas will be the primary fuel source.

- 4.4.5. *The type of lighting system selected and the annual end-use energy estimate for lighting.*

LED fixtures will be used throughout the building. Projected energy usage as well as a description of how lighting fixtures will be controlled are included under “Lighting System” in **Attachment 20 (Energy Data Sheet)**.

## 5. COMMUNITY IMPACTS

### 5.1. Communication with Potentially Affected Public

- 5.1.1. *List all attempts made to communicate with and provide information to the public.*

Applicant has shared a brief overview of the project scope with the City of West Bend officials to address the appropriate planning code requirements. A preliminary site plan review has not occurred. The project will be formally submitted to the City of West Bend for review when required. Project information will be shared with interested parties following submittal of the Application to the PSCW.

- 5.1.2. *Provide a description of public information meetings and who was invited.*

None to date. The City of West Bend officials have indicated a desire to share the project scope at upcoming City board meetings, which are public meetings. Applicant’s staff will attend those meetings and provide information and resources as needed.

- 5.1.3. *Submit copies of public outreach mailings and handouts.*

None to date. See Applicant’s response to 5.1.1 and 5.1.2.

- 5.1.4. *Provide electronic copies of written public comments (e.g., letters, emails, forms, etc.) submitted prior to filing the application with the PSC.*

None to date. See Applicant’s response to 5.1.1 and 5.1.2.

## 5.2. Community Issues

*Discuss any concerns that groups or potentially impacted communities have raised.*

Applicant is working with the City of West Bend officials and Tax Incremental District Number Sixteen (“TID #16”) to share project plans. Applicant’s continued commitment to the area is viewed as an asset to the community.

## 5.3. Land Use Plans

*Provide relevant portions of land-use plans that describe future land uses potentially impacted by the project. (Land use plans include recreational plans, agricultural plans, etc.)*

Future land uses will not be impacted by the proposed project as the Project Site is currently zoned as M-2 Industrial District and B-1 Community Business District. See **Attachments 1 (Project Location Map) and 2 (Parcels Map)**.

## 5.4. Agriculture

*For each part of the project affecting agricultural land, provide the following:*

5.4.1. *Type of farming that could be impacted by the proposed project, such as pasture, row crops, or other type (e.g. orchards, tree plantations, cranberry bogs, etc.).*

There are no agricultural lands occurring within the project site; therefore, this section is not applicable.

5.4.2. *The amount of land that would no longer be farmed.*

See Applicant’s response to 5.4.1.

5.4.3. *Any impacts to farming operations (including windbreaks) from the construction or operation of the project.*

There are no specific agricultural practices, such as irrigations systems, windbreaks, organic farming practices, or drainage systems

located within the project site; therefore, there will be no impacts to agricultural practices.

- 5.4.4. Specific details for plans as to mitigation or minimizing construction impacts in and around agricultural lands.

There are no agricultural lands within the project site; therefore, there will be no impacts to agricultural lands.

## **5.5. Residential and Urban Areas**

- 5.5.1. *Discuss anticipated impacts to residential/urban neighborhoods and communities such as noise, dust, duration of construction, time-of-day of construction, road congestion, impacts to driveways, etc.*

The construction is governed by local building codes and permitting requirements. The Project Site is within Wingate Creek Business Center, bordered by retail, commercial and industrial tenants. Residential parcels are in the vicinity of the Project Site, however, they are buffered by a grocery store and Highway 33. Aside from noise associated with construction activity, there are no anticipated impacts to the surrounding community.

- 5.5.2. *Discuss plans as to how anticipated impacts would be mitigated.*

Applicant intends to work during allowed standard hours to mitigate noise impacts.

## **5.6. Aesthetic Impacts**

- 5.5.1. *Discuss the potential aesthetic issues associated with the proposed project as it relates to the surrounding land uses.*

The new facility will be functionally efficient, economical, and aesthetically pleasing. Applicant also proposes to lay out the Project Site in a way that uses the service center to screen the view of the material storage yard. Landscaping will be installed to satisfy local

municipality requirements. Further, Applicant will use native plantings to minimize maintenance while ensuring an appropriate and aesthetically pleasing appearance.

5.5.2. *Describe any plans for landscaping or other measures used to mitigate the potential aesthetic impacts to the surrounding land uses.*

See Applicant's response to 5.5.1.

## **5.7. Parks and Recreation Areas**

5.7.1. *Identify any parks and recreation areas or trails that may be impacted by the proposed project and the owner/manager of each recreation resource.*

No parks, recreation areas or trails will be impacted by the proposed project as the Project Site is situated within Wingate Creek Business Center. See **Attachment 2 (Parcels Map)**.

5.7.2. *Discuss how short- and long-term impacts to these resources might be mitigated.*

See Applicant's response to 5.6.1.

## **6. NATURAL RESOURCE IMPACTS**

### **6.1. Forested Lands**

*Forested lands for the purposes of these AFRs are defined as an upland area of land covered with woody perennial plants reaching a mature height of at least 6 feet tall with definite crown (closure of at least 10%). For the purposes of these AFRs, forested lands would not include narrow windbreaks located between agricultural areas, but would include shrublands and forested riparian areas.*

6.1.1. *Describe the forested lands that would be impacted by the proposed project. Include the following information in the description:*

- *Type of forest*
- *Dominant species*

- *Average age, size of trees*
- *Ownership (private, county, etc.)*
- *Use (recreation, timber, riparian habitat, etc.)*

There are no forested lands located within the Project Site; therefore, no forested lands will be impacted by the proposed project.

See **Attachment 2 (Parcels Map)**.

#### 6.1.2. *Managed Forest Law (MFL) and Forest Crop Law (FCL)*

There are no properties within the Project Site that are enrolled in the Wisconsin Managed Forest Law (MFL) or Forest Crop Law (FCL) program; therefore, this section and the corresponding subparts are inapplicable.

6.1.2.1. *Identify properties within proposed ROWs that are enrolled in the MFL or FCL programs. For properties enrolled in MFL, include the anticipated amount of forested areas that would be cleared on each property.*

Not Applicable. See 6.1.2 above.

6.1.2.2. *Discuss how the proposed project would affect the properties enrolled in the MFL or FCL programs and how landowners would be compensated for that impact.*

Not Applicable. See 6.1.2 above.

#### 6.1.3. *Provide specific details for plans as to mitigating or minimizing construction impacts in and around forested lands.*

There are no forested lands within the Project Site; therefore, no mitigation or minimization of impacts in and around forested lands is required.



## **6.2. Grasslands**

*Grasslands for purposes of these AFRs are defined as lands covered by non-cultivated herbaceous (non-woody) vegetation predominated by perennial grasses and forbs.*

6.2.1. *Describe the grasslands that would be impacted by the proposed project. Include the following information in the description:*

- *Type of grassland (prairie, pasture, old field, etc.)*
- *Dominant species*
- *Ownership (private versus public)*
- *Use (agricultural, non-productive agricultural, recreation, natural area, etc.)*

There are no grasslands located within the Project Site; therefore, no grasslands will be impacted by the proposed project.

6.2.1. *Provide specific details for plans as to mitigating or minimizing construction impacts in and around grasslands.*

There are no grasslands within the Project Site; therefore, no mitigation or minimization of impacts in and around grasslands is required.

## **6.3. Invasive Species**

6.3.1. *Describe areas where invasive species or disease-causing organisms have been observed or are a concern for the construction of the project (e.g., invasive plants, oak wilt, emerald ash borer, etc.). State if invasive species surveys have occurred or will be conducted. If invasive species surveys have been conducted, provide documentation*

*showing where surveys occurred and locations of invasive species found, indicating which species.*

An informal floristic assessment was completed during the wetland delineations that occurred on September 21, 2021 and April 27, 2023. During the assessment, the general location and composition of invasive plant species present within the Project Site were documented. Specific emphasis was placed on identifying invasive species that are listed as Restricted or Prohibited as defined in the Invasive Species Rule (Wis. Admin. Code ch. NR 40). There were no prohibited species observed within the Project Site.

The following NR 40 Restricted species were observed:

- Canada thistle (*Cirsium arvense*)
- Crown vetch (*Securigera varia*)
- Honeysuckle (*Lonicera spp.*)
- Reed canary grass (*Phalaris arundinacea*)

Additional species observed that are not included in ch. NR 40 include mullein (*Verbascum Thapsus*) and burdock (*Arctium minus*).

The Project Site is periodically mowed, so none of the invasive species observed were widespread. The reed canary grass was contained in and around the wetland areas. The crown vetch was observed in the northern and northwestern portions of the Project Site. The other species were scattered throughout the Project Site.

No clearing or removal of any trees is proposed as part of the project; therefore, forest pests and pathogens are not required to be addressed.

- 6.3.2. *Describe any mitigation methods that would be used to prevent the introduction and the spread of invasive plants or disease-causing organisms and comply with Wis. Admin. Code ch. NR 40, such as cleaning of machinery, etc.*

The Company is committed to minimizing the introduction and spread of invasive species, oak wilt, and emerald ash borer while constructing

proposed projects. A variety of measures are implemented by the Company and its contractors to minimize the potential for spreading these organisms. These measures generally follow the guidelines found in the Wisconsin Council on Forestry manual for Invasive Species Best Management Practices (BMPs) For Transportation and Utility Rights-of-Way, as well as other state guidance documents.

#### **6.4. Archaeological and Historic Resources**

*Confidential information includes only the specific location and other sensitive details of archaeological and human burial sites (e.g. maps). Confidential information should be submitted on ERF as a confidential version in addition to a redacted public version. The Wisconsin Historical Society (WHS) can provide a list of qualified archaeologists, architectural historians, human burial specialists, or tribal preservation officers who may be able to perform steps of this review. Access to the Wisconsin Historic Preservation Database (WHPD) is necessary to complete this review. Access to WHPD is free at the WHS headquarters or can be used online for a fee. Depending on the outcome of this review, Commission staff may be required to consult with the State Historic Preservation Office (SHPO). SHPO consultation may take up to an additional 30 days. The Guide for Public Archeology in Wisconsin, provides information about best management practices.*

6.4.1. *Provide maps or GIS files and a description of all archaeological sites, historic buildings and districts, and human burial sites within the project's area of potential effect (APE). For archaeological and historic sites, the APE is comprised of the physical project area where any ground disturbing activity may occur (e.g. digging, heavy equipment movement, etc.). For historic buildings and districts, the APE consists of the distance that the project may be visible from the outside of the project area. Maps of archaeological and burial sites must be submitted confidentially.*

A cultural resources review, including a comprehensive archival and literature review of architectural, historical and archeological resources within a one-mile radius of the Project Site was completed. See Confidential **Attachment 21 (Cultural Resource Review)**. One

archeological site was identified within the project site; a map and a description of this site can be found in the aforementioned report.

- 6.4.2. *For archaeological sites and historic buildings or districts within the APE, determine the boundaries, historic significance, and integrity of each resource. Additional field surveys may be necessary to properly make these determinations. Note: in some cases, such as a landowner not granting land access, field surveys may instead be performed following the approval of a project.*

An identification of the boundaries, historic significance, and integrity of the archeological site is included in the report provided in **Confidential Attachment 21 (Cultural Resource Review)**.

- 6.4.3. *Identify the potential project effects on each resource.*

As described in the **Confidential Attachment 21 (Cultural Resource Review)**, no further investigation of the archeological site is recommended.

- 6.4.4. *Describe any modifications to the project that could reduce, eliminate, avoid, or otherwise mitigate effects on the resources under this section. Examples of modifications include changes to construction locations, modified construction practices (e.g. use of low-pressure tires, matting, etc.), placement of protective barriers and warning signage, and construction monitoring.*

No impacts to archeological or historic resources are anticipated; therefore, this section is inapplicable.

- 6.4.5. *For any human burial sites within the APE, it is necessary to contact WHS to determine whether a Burial Site Disturbance Authorization/Permit is required. Provide verification.*

The Project Site does not intersect any known burial sites; therefore, no Burial Site Disturbance Authorization/Permit is required from the WHS.

6.4.6. *Provide an unanticipated archaeological discoveries plan. The plan should outline procedures to be followed in the event of an unanticipated discovery of archaeological resources or human remains during construction activities for the project.*

The Unanticipated Archaeological Discoveries Plan can be found in **Attachment 23 (Cultural Resources Unanticipated Archaeological Discoveries Plan)**.

6.4.7. *Applicants should notify Wisconsin Tribal Historic Preservation Officers of any Native American human burial sites and significant prehistoric archaeological sites within the APE. Provide copies of all such correspondence.*

The Project Site does not intersect any known Native American human burial sites or significant prehistoric archaeological sites; therefore, this section is inapplicable.

## **6.5. Restoration of Disturbed Areas**

*Provide a re-vegetation and site restoration plan which discusses the following items:*

- *Type of re-vegetation proposed for impacted areas (e.g. traditional restoration seed mixes, specialty native seed mixes for restoration of high quality habitats or habitat enhancement such as seeding with a pollinator species).*

Project Site restoration will focus on the areas disturbed during construction. These areas may be categorized in two ways: 1) soil disturbance and 2) vegetation disturbance.

Soil disturbance will generally be limited to the Applicant's property with access from Trenton Road and Wingate Street. All remaining soils will be graded in accordance with the designed grading plan.

Vegetation disturbance will be temporary in nature. Precautionary protocols during construction (described in Section 4), and post-construction seed installation and management will be employed to minimize invasive species spread and encourage the re-establishment of native species in communities dominated by native species pre-construction.

Re-seeding will be completed in areas of perennial vegetation disturbed by construction activities. All other disturbed areas will be revegetated with standard WisDOT seed mixes appropriate for site conditions. No specialty native seed mixes are proposed to be used as there are no high quality habitats occurring in the project area.

Erosion and sediment controls will be implemented as needed and maintained until final restoration and stabilization are achieved. Grades will be established to the designed elevations. All areas planned to be vegetated following construction will be restored to turf lawn.

- *Vegetative monitoring criteria (e.g. number of post-construction years or percent cover achieved) and methods.*

Aside from monitoring during the required storm water inspections, no additional post-construction vegetation monitoring is proposed.

- *Invasive species monitoring and management.*

Aside from monitoring during the required storm water inspections, no additional post-construction invasive species monitoring is proposed.

- *Proposed landscaping at any associated facilities.*

Disturbed areas at associated facilities will be revegetated and monitored in conjunction with the remaining Project Sites.

## **6.6. Contaminated Sites**

- 6.6.1. *Using the Wisconsin Remediation and Redevelopment Database (WRRD), <http://dnr.wi.gov/topic/Brownfields/WRRD.html>, identify any contaminated sites (open and closed) within the project area and within two miles of the project area.*

A review of the Wisconsin Remediation and Redevelopment Database was completed for an area within two miles of the Project Site. A map depicting contaminated sites located adjacent to the Project Site is included in **Attachment 24 (Contaminated Sites Map)**. Tables identifying open and closed contaminated sites within two miles of the Project Site are included in **Attachments 25 (BRRTS Open Contaminates Sites Table) and 26 (BRRTS Closed Contaminates Sites Table)**. There are no contaminated sites within the Project Site. There are 16 open and 85 closed contaminated sites within a 2 mile radius of the Project Site. Based on the locations of these contaminated sites, contamination is not anticipated to be encountered during construction.

- 6.6.2. *Using the Historic Registry of Waste Disposal Sites, <http://dnr.wi.gov/topic/Landfills/registry.html>, identify any Environmental Repair and Solid Waste disposal sites within the project area and within two miles of the project area.*

A review of the Historic Registry of Waste Disposal Sites was completed for an area within two miles of the project site. A table identifying Environmental Repair and Solid Waste Disposal Sites within two miles of the Project Site is included in **Attachment 27 (Environmental Repair and Solid Waste Disposal Sites Table)**. There are no Environmental Repair and Solid Waste Disposal sites within the Project Site. There are five sites located within a two-mile radius of the Project Site. Based on the distance of these sites to the Project Site, contamination is not anticipated to be encountered during construction.

## **7. Waterway /Wetland Permitting Activities**

*This section covers information required by DNR for wetland and waterway permits. The following subsections apply to all proposed project sites or routes. These sections should be consistent with the wetlands and waterways included in DNR Tables 1 and 2 and*

*associated wetland and waterway maps. See the Wetlands and Waterways section of the Introduction portion of this document on what to include in DNR Tables 1 and 2 regarding waterway resources. Questions about this section should be directed to DNR Office of Energy's Energy Project Liaison staff.*

## **7.1. Waterway Activities**

*This section should be consistent with the waterways included in DNR Tables 1 and 2 and associated maps. This section should apply to the proposed and alternative sites/routes (if applicable) and their associated facilities (for example, off-ROW access roads, staging areas, permanent structures, new substations and/or expansion of existing substations (including associated driveways and permanent storm water management features to be constructed).*

*7.1.1. Identify the number of waterways present, including DNR-mapped waterways and additional field identified waterways. Also identify the number of times the waterway meanders in and out of the project area and indicate the number of waterway crossings.*

There are no waterways present within the Project Site; therefore, there no DNR-mapped waterways, field identified waterways, meanders or crossings within the Project Site.

*7.1.2. Identify any waterways in the project route(s) that are classified as Outstanding or Exceptional Resource Waters, Trout Streams, Wild Rice Waters, and/or Wild or Scenic Rivers.*

There are no waterways present within the Project Site; therefore, this section is inapplicable.

*7.1.3. State if you are requesting DNR staff perform a navigability determination on any of the DNR mapped waterways and/or field identified waterways that will be impacted and/or crossed by project activities. If a navigability determination is requested, provide the following information in a separate appendix with the application filing:*



- *A table with columns for:*
  - o *The crossing unique ID,*
  - o *Waterbody Identification Code (WBIC) for each waterway (found in the Surface Water Data Viewer or in the GIS data for the DNR mapped waterways),*
  - o *Latitude and longitude for each crossing,*
  - o *Waterway name,*
  - o *Waterway characteristics from field investigation, and;*
  - o *Any other pertinent information or comments.*
- *Site photographs, clearly labeled with the photo number, direction, date photo taken, and crossing unique ID. A short description of what the photo is showing, and any field observation must also be included in the caption.*
- *Aerial photograph review of multiple years, including historical photos.*
- *Project map showing the following:*
  - o *Aerial imagery (leaf-off, color imagery is preferred),*
  - o *DNR mapped waterways (labeled with their unique ID),*
  - o *Field identified waterways (labeled with their unique ID),*
  - o *The location of each site photograph taken (labeled with the photo number),*
  - o *The project area*
  - o *Call out box/symbol for each DNR mapped waterway crossing where the navigability determination is requested (labeled with their unique ID).*

There are no waterways present within the Project Site; therefore, this section is inapplicable.

7.1.4. *Provide the following information:*

- 7.1.4.1. *How many waterway crossings are proposed to be traversed with equipment and how that crossing will be accomplished (i.e. placement of temporary clear span bridges (TCSB), use of existing bridge or culvert, driving on the bed, etc.).*

There are no waterways present within the Project Site; therefore, this section and the corresponding subparts are inapplicable.

- 7.1.4.2. *How many structures are proposed to be placed below the ordinary high water mark (OHWM) of a waterway. Indicate if structures are temporary or permanent.*

There are no waterways present within the Project Site; therefore, this section is inapplicable.

- 7.1.4.3. *Indicate if any other waterways would be impacted and/or crossed by other construction activities regulated under Chapter 30 Wis. Stats. (i.e. placement of a new storm water pond within 500 feet of a waterway, stream relocation, staging areas, placement of riprap, etc.).*

There are no waterways that will be impacted and/or crossed by activities regulated under Chapter 30 Wis. Stats.; therefore, this section is inapplicable.

- 7.1.4.4. *For underground installation only: Indicate the amount of waterway crossings via underground installation and specify the installation method (i.e. X waterways will be bored, Y waterways will be trenched, etc.)*

There are no waterways present within the Project Site; therefore, this section is inapplicable.

- 7.1.5. *Provide any methods to be used for avoiding, minimizing, and mitigating construction impacts in and near waterways. This discussion should include, but not be limited to, avoiding waterways, installation methods (i.e. directional bore versus open-cut trenching or plowing), equipment crossing methods (i.e. for temporary access, the use of TCSB versus temporary culvert;*

*for permanent access, the use of permanent bridge versus permanent culvert), sediment and erosion controls, invasive species protocols for equipment, etc.*

There are no waterways present within the Project Site; therefore, this section is inapplicable.

7.1.6. *For waterways that will be open-cut trenched, provide the following:*

There are no waterways present within the Project Site; therefore, this section and the corresponding subparts are inapplicable.

7.1.6.1. *State if any waterways are wider than 35 feet (measured from OHWM to OHWM).*

Not Applicable. See 7.1.6 above.

7.1.6.2. *The machinery to be used, and where it will operate from (i.e. from the banks, in the waterway channel) and if a TCSB is needed to access both banks.*

Not Applicable. See 7.1.6 above.

7.1.6.3. *The size of the trench (length, width, and depth) for each waterway crossing.*

Not Applicable. See 7.1.6 above.

7.1.6.4. *Details on the proposed in-water work zone isolation/stream flow bypass system (i.e. dam and pump, dam and flume, etc.).*

Not Applicable. See 7.1.6 above.

7.1.6.5. *Duration and timing of the in-stream work, including the installation and removal of the isolation/bypass system and the trenching activity.*

Not Applicable. See 7.1.6 above.

7.1.6.6. *Plans on how impacts to the waterway will be minimized during in- water work (i.e. energy dissipation, sediment controls, gradually releasing dams, screened and floating pumps, etc.).*

Not Applicable. See 7.1.6 above.

7.1.6.7. *How the waterway bed and banks would be restored to pre-existing conditions.*

Not Applicable. See 7.1.6 above.

7.1.7. *For waterways that will be directionally bored, provide the following:*

No waterways will be directionally bored as part of the project; therefore, this section and the corresponding subparts are inapplicable.

7.1.7.1. *The location and size of any temporary staging and equipment storage.*

Not Applicable. See 7.1.7 above.

7.1.7.2. *The location and size of bore pits and their distance from waterways.*

Not Applicable. See 7.1.7 above.

7.1.7.3. *Provide a contingency plan for bore refusal and a plan for the containment and clean-up of any inadvertent releases of drilling fluid (e.g. a frac-out).*

Not Applicable. See 7.1.7 above.

7.1.8. *For waterways that will have a TCSB installed across them, provide the following:*

No waterbodies or waterways will have a temporary clear span bridge (TCSB) installed across them as part of the project; therefore, this section and the corresponding subparts are inapplicable.

7.1.8.1. *Description of the TCSB proposed, including dimensions, materials, and approaches. Verify the TCSB will completely span the waterway.*

Not Applicable. See 7.1.8 above.

7.1.8.2. *State if any waterways are wider than 35 feet (measured from OHWM to OHWM), and/or if any in-stream supports will be used.*

Not Applicable. See 7.1.8 above.

7.1.8.3. *State how the TCSB placement and removal will occur (i.e. carried in and placed with equipment, assembled on site, etc.) and if any disturbance would occur to the bed or banks for the installation and removal, including bank grading or cutting.*

Not Applicable. See 7.1.8 above.

7.1.8.4. *Duration of the placement of the TCSB.*

Not Applicable. See 7.1.8 above.

7.1.8.5. *Sediment controls that will be installed during the installation, use, and removal of the TCSB's.*

Not Applicable. See 7.1.8 above.

7.1.8.6. *How the TCSB's will be inspected during use and how they will be anchored to prevent them from being transported downstream.*

Not Applicable. See 7.1.8 above.

7.1.8.7. *State if the required 5-foot clearance will be maintained, or if the standards in NR 320.04(3), Wis. Adm. Code will be complied with.*

Not Applicable. See 7.1.8 above.

7.1.8.8. *How the waterway bed and banks would be restored when the TCSB is removed.*

Not Applicable. See 7.1.8 above.

7.1.9. *Describe the proposed area of land disturbance and vegetation removal at waterway crossings. Include a description of the type of vegetation to be removed (e.g. shrub, forest), and if this vegetation removal will be temporary (allowed to regrow) or permanent (maintained as cleared).*

No aboveground waterway crossings are required as part of the project; therefore, there will be no land disturbance or vegetation removal associated with waterway crossings.

7.1.10. *If any of the following activities are proposed, provide the information as detailed on the applicable permit checklist:*

- *New culvert placement:*  
<https://dnr.wi.gov/topic/waterways/documents/PermitDocs/GPs/GP-CulvertWPEDesign.pdf>  
<https://dnr.wi.gov/topic/Waterways/documents/PermitDocs/IPs/IP-culvert.pdf> (General Permit) or (Individual Permit).
- *New permanent bridge placement:*  
<https://dnr.wi.gov/topic/waterways/documents/PermitDocs/GPs/GP-ClearSpanBridge.pdf>  
<https://dnr.wi.gov/topic/Waterways/documents/PermitDocs/IPs/IP-bridgeTempCross.pdf> (General Permit, no in-stream supports) or (Individual Permit, in-stream supports).
- *New storm water pond placed within 500 feet of a waterway:*  
<https://dnr.wi.gov/topic/waterways/documents/PermitDocs/GPs/GP-StormwaterPond.pdf>.

None of the above listed activities are proposed to occur within the Project Site; therefore, this section is inapplicable.

## 7.2. Wetland Activities

*This section should be consistent with the waterways included in DNR Tables 1 and 2 and associated maps. This section should apply to the proposed and alternative sites/routes (if applicable) and their associated facilities (for example, off-ROW access roads, staging areas, permanent structures, new substations and/or expansion of existing substations (including associated driveways and permanent storm water management features to be constructed).*

- 7.2.1. *Describe the method(s) used to identify wetland presence and boundaries within the project area (i.e. wetland field delineation, wetland field determination, conservative desktop review, etc.). If conservative desktop review was the only method used to identify the presence of wetlands, state if any areas will be field-verified (and when). If a combination of methods were used, describe which project areas utilized which method. The associated delineation report and/or desktop review documentation should be uploaded to the PSC's website as part of the application filing.*

A desktop wetland assessment was completed August 24, 2021, the results of which were confirmed during a delineation completed on September 21, 2021 and April 27, 2023. Two wetlands were identified within the Project Site. A wetland delineation report **Attachment 9 (Wetlands and Waterways)** dated

May 10, 2023 was submitted to the WDNR and received confirmation from WDNR staff on June 9, 2023, which is provided in **Attachment 28 (WDNR Wetland Delineation Concurrence)**. The wetlands were deemed artificial by WDNR staff on July 7, 2023 in correspondence provided in **Attachment 29 (WDNR Artificial Wetland Exemption Determination)**. The wetlands within the Project Site were submitted to the USACE for a Jurisdictional Determination review. The wetlands were determined not to be subjected to the USACE jurisdiction on December 7, 2023 in the Approved Jurisdictional Determination, which is provided in **Attachment 32 (USACE Approved Jurisdictional Determination)**.

- 7.2.2. *Identify the number of wetlands present and by wetland type, using the Eggers and Reed classification. Provide as an overall project total, as well as broken down by the proposed site and the alternative site(s) (if applicable) and their associated facilities.*

Two artificial wet meadows (identified as W-1 and W-2 in **Attachment 9 (Wetlands and Waterways)**) are present within the proposed Project Site and have a total area of 0.299 acres.

- 7.2.3. *Wetland functional values:*

- 7.2.3.1. *Discuss the existing functional values of the wetland present. Functional values include but are not limited to floristic diversity, fish and wildlife habitat, flood storage, water quality, groundwater discharge and recharge, public use, etc.*

Both artificial wetlands, W-1 and W-2, are fresh wet meadow plant communities dominated by reed canary grass, path rush, and New England aster. The boundaries of these artificial wetlands were delineated based on the vegetation, topography, soils, and hydrology observed within and adjacent to them. It appears these wetlands formed due to poor grading practices following site grading. These wetlands have experienced disturbances in the form of plowing, minor grading, mowing, and introduction of invasive species such as reed canary grass. Therefore, there is limited functional value of these wetlands. The wetlands were deemed artificial by WDNR staff on July 7, 2023 in correspondence



provided in **Attachment 29 (WDNR Artificial Wetland Exemption Determination)**.

- 7.2.3.2. *Discuss how the project may impact existing functional values of wetlands.*

Due to the nature of the two artificial wetlands identified, they have limited existing functional value; therefore, this section is inapplicable.

- 7.2.3.3. *Provide Wisconsin Rapid Assessment Methodology (WRAM) forms, or other assessment methodology documentation, if completed.*

Assessment methodology is provided as part of the wetland delineation provided in **Attachment 9 (Wetlands and Waterways)**.

- 7.2.4. *Identify any wetlands in the project area that are considered sensitive and/or high- quality wetlands, including, but not limited to:*

- 7.2.4.1. *Any wetlands in or adjacent to an area of special natural resource interest (ASNRI) (NR 103.04, Wis. Adm. Code).*

There are no wetlands in or adjacent to an area of special natural resource interest within the Project Site; therefore, this section is inapplicable.

- 7.2.4.2. *Any of the following types: deep marsh, northern or southern sedge meadow not dominated by reed canary grass, wet or wet-mesic prairie not dominated by reed canary grass, fresh wet meadows not dominated by reed canary grass, coastal marsh, interdunal or ridge and swale complex, wild rice-dominated*

*emergent aquatic, open bog, bog relict, muskeg, floodplain forest, and ephemeral ponds in wooded settings.*

There are none of the aforementioned wetland types present within the Project Site; therefore, this section is inapplicable.

- 7.2.4.3. *Any wetlands with high functional values based on factors such as abundance of native species and/or rare species, wildlife habitat, hydrology functions, etc.*

There are no wetlands with high functional values present within the Project Site; therefore, this section is inapplicable.

- 7.2.5. *Provide the following:*

- 7.2.5.1. *The number of wetlands that would have construction matting placed within them to facilitate vehicle access and operation and/or material storage. Provide the total amount of wetland matting, in square feet.*

There are no wetlands that will have construction matting placed within them present within the Project Site; therefore, this section is inapplicable.

- 7.2.5.2. *The number of structures that would be constructed within wetlands. Indicate if structures are temporary or permanent. Provide the total square footage of permanent and temporary wetland impact for the placement of structures.*

One permanent structure will be placed within artificial wetland for a total of of 13,024 sq ft of permanent artificial wetland impact.

- 7.2.5.3. *How many wetlands will have permanent fill placed within them. Provide the total amount of permanent wetland fill, in square feet.*

Two artificial wetlands (W-1 and W-2) will have permanent fill placed within them for a total wetland fill amount of 13,024 sq. ft. The wetlands were deemed artificial by WDNR staff on July 7, 2023 in correspondence provided in **Attachment 29 (WDNR Artificial Wetland Exemption Determination)**.

- 7.2.5.4. *How many shrub and/or forested wetlands would be cleared for construction? Provide the total amount of shrub and/or forested wetland conversion, in square feet.*

There are no shrub and/or forested wetlands present within the Project Site; therefore, this section is inapplicable.

- 7.2.5.5. *How many wetlands will be impacted and/or crossed by other construction activities regulated under 281.36 Wis. Stats. (i.e. road building activities such as grading and cutting, substation upgrades, new tie-ins, vehicle/equipment access across wetland resulting in soil mixing or soil rutting, etc.).*

Two artificial wetlands (W-1 and W-2) will be permanently filled and will be impacted by site grading and cutting activities.

- 7.2.5.6. *For underground installation only: how many wetlands will be crossed by collection lines and specify the installation method (i.e. X wetlands will be bored, Y wetlands will be trenched, etc.).*

There are no underground installation proposed as part of this Project; therefore, this section is inapplicable.

- 7.2.6. *Describe the sequencing of matting placement in wetlands and the anticipated duration of matting placement in wetlands. For matting placed in any wetland for longer than 60 consecutive days during the growing season, prepare and submit a wetland matting restoration plan with the application filing.*

There are no wetlands that will have construction matting placed within them present within the Project Site; therefore, this section is inapplicable.

7.2.7. *For wetlands that will be open-cut trenched, provide the following:*

No wetlands will be open-cut trenched as part of this Project; therefore, this section and the corresponding subparts are inapplicable.

7.2.7.1. *Provide details on the total disturbance area in wetland, including how total wetland disturbance was calculated. Include the size of the trench (length, width, and depth), where stockpiled soils will be placed (i.e. in upland, in wetlands on construction mats, etc.), and where equipment will operate.*

Not Applicable. See 7.2.7 above.

7.2.7.2. *Provide details on the proposed trench dewatering, including the method(s) that may be used (pumps, high capacity wells, etc.), how discharge will be treated, and where the dewatering structure will be located.*

Not Applicable. See 7.2.7 above.

7.2.7.3. *Duration and timing of the work in wetlands.*

Not Applicable. See 7.2.7 above.

7.2.7.4. *How the wetlands would be restored to pre-existing conditions.*

Not Applicable. See 7.2.7 above.

7.2.8. *For wetlands that will be directionally bored, provide the following:*

No wetlands will be directionally bored as part of this Project; therefore, this section and the corresponding subparts are inapplicable.

7.2.8.1. *How bored wetlands and associated bore pits will be accessed.*

Not Applicable. See 7.2.8 above.

7.2.8.2. *The location and size of any temporary staging and equipment storage.*

Not Applicable. See 7.2.8 above.

7.2.8.3. *The location and size of bore pits and the distance from wetlands.*

Not Applicable. See 7.2.8 above.

7.2.8.4. *Provide a contingency plan for bore refusal and a plan for the containment and clean-up of any inadvertent releases of drilling fluid (e.g. a frac-out).*

Not Applicable. See 7.2.8 above.

7.2.9. *For wetlands that will be plowed, resulting in a discharge of fill (soil mixing and/or soil rutting), provide the following:*

No wetlands will be plowed as part of this project; therefore, this section and the corresponding subparts are inapplicable.

7.2.9.1. *Provide details on the total disturbance area in wetland, including how total wetland disturbance was calculated.*

Not Applicable. See 7.2.9 above.

7.2.9.2. *Duration and timing of the work in wetlands.*

Not Applicable. See 7.2.9 above.

7.2.9.3. *How the wetlands would be restored to pre-existing conditions.*

*Note: Plowing through saturated or wet/soggy wetlands would likely result in soil mixing and rutting, and thus the plowing would then likely be 281.36 Wis. Stats. regulated activity.*

Not Applicable. See 7.2.9 above.

7.2.10. *For wetlands that will be crossed/accessed by vehicle/equipment resulting in a discharge of fill (soil mixing and/or soil rutting), provide the following:*

7.2.10.1. *Provide details on the total disturbance area in wetland, including how total wetland disturbance was calculated.*

Two artificial wetlands (W-1 and W-2) will have permanent fill placed within them for a total wetland fill amount of 13,024 sq. ft. The footprint of the development will cover the entire artificial wetland areas.

7.2.10.2. *Duration and timing of the work in wetlands.*

Site grading activities within the artificial wetlands are planned to begin in October 2025.

7.2.10.3. *How the wetlands would be restored to pre-existing conditions.*

*Note: Vehicle/equipment access through saturated or wet/soggy wetlands would likely result in soil mixing and rutting, and thus the plowing would then be 281.36 Wis. Stats. regulated activity.*

The wetlands will not be restored to their preexisting condition, as they have been determined to be artificial by WDNR staff in correspondence dated July 7, 2023 see **Attachment 29 (WDNR Artificial Wetland Exemption Determination)**. The artificial wetlands will be permanently filled as part of the site grading.

7.2.11. *For wetland vegetation that will be cleared or cut for construction, provide the following:*

7.2.11.1. *Justification for why wetland trees and shrubs are proposed to be cleared, and what construction activity the clearing is associated with (e.g. transmission line installation, off-ROW access road, staging area, etc.).*

There are no wetlands with trees or shrubs within the Project Site; therefore, this section is inapplicable.

7.2.11.2. *The timing and duration of vegetation removal.*

There are no wetlands with trees or shrubs within the Project Site; therefore, this section is inapplicable.

7.2.11.3. *Describe the type of equipment that will be used, and if the vegetation removal will result in soil disturbance, including rutting and soil mixing.*

Two artificial wetlands will have permanent fill placed within them for a total wetland fill amount of 13,024sq. ft. Vegetation will be removed as the project site is cut to grade. Typical construction

site grading equipment is expected to be used to grade the project site, including backhoes, bulldozers, scrapers, and dumptrucks.

7.2.11.4. *The type of wetland and type of vegetation to be cleared.*

Artificial wetlands, W-1 and W-2, are fresh wet meadows dominated by reed canary grass, path rush and New England aster. All vegetation will be cleared as a result of the project site grading plan.

7.2.11.5. *State if tree and shrubs that are removed will be allowed to regrow or be replanted, or if cleared areas will be kept free of trees and shrubs long-term.*

There are no wetlands with trees or shrubs within the Project Site; therefore, this section is inapplicable.

7.2.11.6. *Indicate the plan for handling and disposing of the debris (brush piles, tree trunks, wood chips, etc.) resulting from vegetation clearing in wetlands. State if debris would be removed from all wetlands to be cleared and disposed of in upland or other non-wetland locations.*

There are no wetlands with trees or shrubs within the Project Site; therefore, this section is inapplicable.

7.2.11.6.1. *If debris is not proposed to be removed from all wetlands during clearing, explain why disposal in non-wetland areas is not feasible.*

There are no wetlands with trees or shrubs within the Project Site; therefore, this section is inapplicable.

7.2.11.6.2. *If debris is not proposed to be removed from all wetlands during clearing, if so, state how debris left in wetland will not restrict re-vegetation growth, will not*



*alter surface elevations, and will not obstruct water flow. If wood chips will be placed in wetlands, state the depth (in inches) proposed.*

There are no wetlands with trees or shrubs within the Project Site; therefore, this section is inapplicable.

7.2.11.6.3. *If debris is not proposed to be removed from all wetlands during clearing, state how these wetlands would be monitored to ensure re-vegetation growth, surface elevations, and water flow are not impacted, and that the proposed depth of chip cover is adhered to. If re-vegetation growth becomes impeded, surface elevations become altered, and/or water flow becomes obstructed from wood chip placement, state how these impacts would be addressed and corrected, if they should occur.*

There are no wetlands to be filled with woody debris or chips within the Project Site; therefore, this section is inapplicable.

7.2.12. *Provide any methods to be used for avoiding, minimizing, and mitigating construction impacts in and near wetlands. This discussion should include, but is not limited to, how wetland impact was first avoided then minimized by shifting the project boundary, relocating structures and/or fill outside of wetland, minimizing construction ROW through wetland, by installation methods (i.e. directional bore versus open-cut trenching, soil segregation during trenching, etc.), equipment crossing methods (i.e. use of construction matting, frozen ground conditions, etc.), sediment and erosion controls, invasive species protocols for equipment, etc. Additional guidance to prepare this discussion can be found here:*

<https://widnr.widen.net/s/fxdd8pmqgg/paasupp3utility>.

The two artificial wetlands (W-1 and W-2) that will be filled during Project construction were a result of poor grading practices that occurred between 2000 and 2005. As described in **Attachment 29 (WDNR Artificial Wetland Exemption Determination)**. The WDNR has determined these wetlands to be artificial and there is no wetland or waterway history within the Project Site prior to August 1, 1991.

- 7.2.13. *Indicate if an environmental monitor will be employed during project construction and restoration activities. If so, describe the monitors roles and responsibilities, frequency of visits, etc.*

There will be no environmental monitor employed during the project construction; therefore, this section is inapplicable.

- 7.2.14. *Describe how all wetlands within the project area would be restored. This discussion should include details on the seeding plan, maintenance and monitoring, restoring elevations and soil profiles, restoring wetland hydrology, etc.*

The two artificial wetlands (W-1 and W-2) will be permanently filled; therefore, no wetlands within the Project Site will be restored.

### **7.3. Mapping Wetland and Waterway Locations, Impacts, and Crossings**

*Provide the following map sets, as described below, for each proposed and alternative sites/routes (if applicable) and their associated components. Each map set should include an overview or index page that includes page extents for the corresponding smaller-scale map pages within the remainder of the map set. The smaller-scale map pages should show the project and resources in greater detail, include page numbers to reference to the overview page, and have consistent scales throughout the pages.*

- 7.3.1. *Aerial Map Imagery showing the following:*

- *Delineated wetlands, labeled with the feature unique ID,*

- *Wisconsin Wetland Inventory (“Mapped Wetlands” SWDV layer) and hydric soils (“Wetland Indicators & Soils” SWDV layer), if a delineation was not conducted,*
- *DNR-mapped waterways, labeled with the feature unique ID,*
- *Field identified waterways, labeled with the feature unique ID,*
- *Vehicle crossing method of waterways for both permanent and temporary access, labeled by the crossing method (i.e. TCSB, installation of culvert, installation of bridge, installation of ford, use of existing culvert, use of existing bridge, use of existing ford, driving on the bed),*
- *ROW,*
- *Locations of temporary and permanent structures,*
- *Transmission line route,*
- *Segment names and nodes,*
- *Access paths (both on and off-ROW). Off-ROW access roads should be labeled with an identifying name or number,*
- *Staging areas, laydowns, and any temporary workspaces, such as crane pads (labeled with identifying name or number),*
- *Footprint of new substations and/or footprint of existing substations to be expanded, and associated driveways and permanent storm water management features to be built (ponds, swales, etc.),*
- *Placement of construction matting in wetlands,*
- *Underground line installation only: symbolize the line route to indicate installation method (directional bore, open-cut trench, plow etc.). This includes the excavation areas in wetlands (i.e. bore pits, open-cut trench, etc.), and;*
- *Locations of any other waterway or wetland impacting activity regulated under Wis. Stats. Chapter 30 and 281.36.*

Assessment methodology is provided as part of the wetland delineation provided in **Attachment 9 (Wetlands and Waterways)**.

- 7.3.2. *A map showing which method(s) were used to identify wetland presence and boundaries within the project area (i.e. wetland field delineation, wetland field determination, conservative desktop review).*

Assessment methodology is provided as part of the wetland delineation provided in **Attachment 9 (Wetlands and Waterways)**.

## **8. Endangered, Threatened, Special Concern Species, and Natural Communities**

*In the Introduction, page ii of this document, additional details are provided on how to perform an Endangered Resources (ER) screening and about performing habitat assessments, if required.*

- 8.1. Provide a copy of the completed ER screening and all supporting materials for all project areas, including all applicable components such as off-ROW access routes, staging areas, new substations, and expansion of existing substations.**

A completed ER screening is provided in the Endangered Resources Review in **Attachment 22**.

- 8.2. Submit results from habitat assessments and biological surveys for the proposed project, if completed or if required to be completed per the ER screening. If surveys or assessments are required to be completed prior to construction but have not yet been completed, state when these surveys will be completed. Results from additional surveys conducted during the review of the application, prior to the start of construction, and/or post-construction must be submitted as they are completed.**

There are no habitat assessments and biological surveys required for the proposed Project Site; therefore, this section is inapplicable. See Endangered Resources Review in **Attachment 22**.

- 8.3. For all project facilities and areas impacted by construction, discuss potential impacts to rare species as identified in the completed ER screening and/or field assessments.**

- 8.3.1. *For any required follow-up actions that must be taken to comply with endangered species law, discuss how each required action would affect the proposed project, and how the required action would be complied with.*

There are no required follow-up actions to comply with endangered species law; therefore, this section is inapplicable.

- 8.3.2. *For any recommended follow-up actions to help conserve Wisconsin's rare species and natural communities, discuss if and how any recommended actions would be incorporated into the proposed project.*

Recommended follow-up actions for a special concern herptile include a time of year restriction or exclusion fencing. Exclusion fencing will be implemented and any individuals found within the Project Site will be relocated outside of the active work area.

- 8.3.3. *If any recommended follow-up actions are not planned to be incorporated into project construction or operation, state the reasons why.*

Time of year restriction is a recommended follow-up action and will not be implemented due to the project schedule.

**8.4. Provide communications with DNR and U.S. Fish and Wildlife Service, as applicable.**

Communication with Wisconsin DNR NHI staff is provided as **Attachment 30 (Endangered Resources Review Correspondence)**.

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Applicant's most advantageous means of discharging its obligations as a public utility. The project will not provide facilities in excess of present and probable future requirements. When placed in operation, the proposed project will not result in annual costs disproportionate to the service value provided by the facility.

We appreciated the opportunity to meet with Commission and WDNR Staff on March 7, 2024 to preview this application. We would welcome the opportunity to continue meeting and discussing as needed to ensure that Staff receives all the information it needs to prepare recommendations on the application. If you have questions about this project or require any additional information, please contact me at [richard.stasik@wecenergygroup.com](mailto:richard.stasik@wecenergygroup.com) or (414) 221-3685.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard F. Stasik". The signature is fluid and cursive, with a prominent initial "R" and "S".

Richard F. Stasik  
Director – State Regulatory Affairs

Attachments