



Public Service Commission of Wisconsin

Eric Callisto, Chairperson
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Public Service Commission of Wisconsin
 RECEIVED: 02/01/11, 2:45:19 PM

February 1, 2011

Mr. Thomas Hillstrom
 414 Nicollet Mall, MP8A
 Minneapolis, MN 55410

Re: Joint Application of Dairyland Power Cooperative, Northern States Power Company-Wisconsin, and Wisconsin Public Power Inc., for Authority to Construct and Place in Service 345 kV Electric Transmission Lines and Electric Substation Facilities for the CapX Twin Cities-Rochester-La Crosse Project, Located in Buffalo, Trempealeau, and La Crosse Counties, Wisconsin

5-CE-136

Dear Mr. Hillstrom:

On January 3, 2011, Dairyland Power Cooperative, Northern States Power Company-Wisconsin, and Wisconsin Public Power Inc. filed an application with the Public Service Commission of Wisconsin (Commission) for authority to construct and place into operation electric transmission facilities serving the La Crosse area. The proposed project would cross the Mississippi River from Minnesota to Alma, Wisconsin, pass through Buffalo and Trempealeau Counties, and terminate at a Substation near Holman, Wisconsin in La Crosse County.

The Commission and the Wisconsin Department of Natural Resources (DNR) have reviewed the application to construct the facilities described above. The Commission, under Wis. Stat. § 196.491(3)(a)2. and Wis. Admin. Code § PSC 111.53, finds the Certificate of Public Convenience and Necessity (CPCN) application to be incomplete because of missing or inaccurate information in the areas described in the attached list.

While both agencies' staff devoted considerable time to reviewing the application, the attached list should not be considered final. It is possible that subsequent staff review may identify areas requiring requests for additional information or clarification in the form of a data request. I would also note that the Endangered and Threatened Species information was filed approximately a week after the applicants said the application filing was complete. Completeness items associated with this information were identified during the shortened review period. However, more completeness items may be identified after subsequent review.

Please keep in mind that the information requirements listed in the attachment will be necessary to continue with the timely review and processing of the CPCN application. This information will be required to complete the record from which the Commission will make its decision whether to approve, modify, or deny the CPCN application under Wis. Stat. § 196.491(3)(d).

Mr. Thomas Hillstrom
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Providing this information in a timely manner is imperative to avoid delays in the Commission's review of the CPCN application and the DNR review of other permit applications.

Wis. Stat. § 196.491(3)(a)2. provides that an applicant may supplement and re-file an application that the Commission deems incomplete. The Commission, however, will not consider the application complete until the applicants have met all of the CPCN application standards to the satisfaction of the Commission and DNR.

For all questions in Attachment A, please format responses in "redline" fashion. In other words, organize all information, data, and narrative in a way that appends and/or replaces pages in the original application. Visually, it may be beneficial to use a different color of paper, rather than white, for all hard copies supplied of redlined pages.

If you have any questions regarding this letter, please contact the docket coordinator William Fannucchi by telephone at (608) 267-3594, or by e-mail at william.fannucchi@wisconsin.gov.

Sincerely,

/s/ Robert Norcross

Robert Norcross
Administrator
Gas and Energy Division

RDN:WAF:jlt:L:\construction\construction transmission\5-CE-136\letters\incompleteness letter w-data request.doc

Attachments

Application Page	AFR	Information Requirement
1-15;Table 1	2.4.2	Describe how the “wetland impact by route” was calculated. Does this right-of-way (ROW) include all wetlands that would be impacted, either temporary or permanent?
1-19, 2-95; Appendix M	2.1.7 and 2.2.3	Provide the cost estimate with component costs and a complete description, including pole types and construction issues that would need to be addressed, for construction and operation of the “Wisconsin Highway 88 Connector” segment identified on page 1-19 of the application. Provide an overall cost for use of this segment to completion of a line to its terminus.
1-19, 2-95; Appendices C, D, and M,	2.2.3 and 2.3.3	Provide maps and appropriate GIS layers showing the Wisconsin Highway 88 Connector segment as part of an Alma-Briggs Road route with appropriate connections made to the remainder of the proposed route.
1-19, 2-95; Appendix A	2.2.3 and 2.4.1.3	Provide environmental and social information for the Wisconsin Highway 88 Connector segment analogous to that provided for proposed route segments including, for example but not limited to, wetlands crossed, farmland crossed, soils and erodability information, and distances to homes. Provide all AFR tables for this new segment.
1-19, 2-95; Appendices M and T	2.2.3 and 2.4	Provide environmental data and social information for the Arcadia-Ettrick Connector segment analogous to that provided for proposed route segments including, for example but not limited to, wetlands crossed, farmland crossed, soils and erodability information, and distances to homes. Use the table formats required in AFR 2.4 and also those used for Appendix T, Tables 1-5.
1-19, 2-95; Appendices M and T	2.1.7 and 2.2.3	Provide the cost estimate with component costs and a complete description, including pole types and construction issues that would need to be addressed, for construction and operation of the Arcadia-Ettrick segment identified on p. 1-19 of the application. Provide an overall cost for use of this segment to completion of a line to its terminus.
2-29, Tables 2.1-1 through 2.1-9; and Appendix L	2.1.2.2	Provide segment ID identification for pole configurations. The pole configuration descriptions in Segment 2.1.2.2, Tables 2.1-1 thru 2.1-9, and the figures in Appendix L do not identify a specific segment.
2-40, 2-41	2.1.3.1	Provide 2010 actual load by substation.
2-46 - 2-48	2.1.3.3	Provide power flow simulation data (raw format) for the TSSR Supplement-2010 161 kV Alternative and alternatives listed in questions 4 to 6 in the August 2010 Data Request.
2-47, 2-49; 2-56 - 2-64	2.1.3.3 and 2.1.7	Provide, in 2010 dollars, costs for the proposed project and project alternatives (including those listed in questions 4 to 6 in the August 2010 Data Request). These costs should include any fee payments. Provide costs (2010 dollars) in the proposed project cost for any upgrades required during the service period (2015-2050) of the proposed project (345 kV line between Hampton and La Crosse). Provide these costs as an MS Excel worksheet.
2-52	2.1.3.4	Provide an MS Excel worksheet that details the calculation of present value for electrical losses shown in Table 2.1-14. These calculations should be based on 2010 dollars. Provide above described MS worksheets for alternatives listed in questions 4 to 6 in the August 2010 Data Request.

Application Page	AFR	Information Requirement
2-54	2.1.4 and 2.6.1	Provide a labeled plan with side and front elevations with dimensions for Figure 1 (Appendix K). Provide vertical dimensions for equipment and provide a diagram(s) showing substation equipment from the side with heights of equipment above ground level. Show proposed equipment in relation to surrounding landscape features.
2-58; Appendix D	2.31, 2.3.3, and 2.7.4	Provide maps and GIS layers to illustrate locations and configurations of existing distribution lines in the project area (particularly those located along any proposed transmission routes or connector segments, or serving the confined animal operations identified in Figure 12, Appendix U).
2-58	2.1.7.2.2, 2.4.1	Provide construction details, including environmental impacts associated with the relocation of any distribution lines, organized by route.
2-60, Table 2.1-9	2.1.7.3.1.3	Discuss the potential costs for replacement trees within DOT ROW and whether that has been included in Total Project Cost Estimates, Table 2.1-19.
2-61, Table 2.1-19 and 2-63, 2.1.7.3.3.1.3	2.1.7.3.3.1.3	Describe what activities would be covered by the estimated \$5,000 per mile for agricultural protection and how the figure was estimated.
2-63	2.1.7.3.3.1.1	Detail how the costs for Internal EMs were determined. Include anticipated hours of work, rate of pay, lodging, meals, travel expenses, etc. How do these cost estimates account for differences in the natural/sensitive resources present along each route?
2-63	2.1.7.3.3.1.2	Detail how the costs for Independent EMs were determined. Include anticipated hours of work, rate of pay, lodging, meals, travel expenses, etc. How do these cost estimates account for differences in the natural/sensitive resources present along each route?
2-63	2.1.7.3.3.3	Detail how the costs for DNR permits and approvals were determined. Do the costs include field studies and reports?
2-64, 2.1.7.3.4 and Appendix H	2.1.7.3.4	Within the high-voltage transmission fee section, discuss how integral the non-345 kV transmission construction is to the proposed 345 kV construction. (This issue relates to the recent Commission discussion of “but for” inclusion of lower voltage portions of a project into the base cost from which the fees are calculated.)
2-92	2.1.7.2.1.2 and 2.4.1.3	Provide an analysis and breakdown of the expected costs and processes necessary to obtain DOT’s release of scenic easements affected by any route.
2-92	2.4.1.3	Provide written documentation from DOT and/or WI Mississippi River Parkway Commission (WMRPC) that identifies the values that will be affected by this project along the Great River Road National Scenic By-Way. Provide an analysis that would evaluate the impact to these values between routes. Refer to the December 28 and January 27, 2010, letters from Ruben L. Anthony and Mike Berg of DOT to William Fannucchi of Commission staff. Explain the reasoning for the values identified. If such documentation cannot be obtained, provide documentation from DOT and/or WMRPC on why it cannot.
2-94; Appendix N	2.2.3	Describe the future of the existing Q1 transmission line and ROW should a Q1 route not be approved by the Commission. When would DPC’s Q1 line need to be rebuilt or upgraded by DPC? What options would DPC pursue if their Q1 line is not rebuilt as part of the CapX project? What state or federal agency approvals would be necessary for each option?
2-94; Table 2.2-3	2.3	This table should include the Galesville option as an option to minimize Black River impacts. Expand this table to include the Galesville option.

Application Page	AFR	Information Requirement
2-94	2.2.3.1.6.1.2	Include information about DNR-owned/managed lands. Provide documentation regarding new easements or changes to existing easements that would be needed along any proposed routes.
2-96	2.4	Describe the potential rerouting of the Marshland-Holland 69 kV line from its location near 7 Bridges Trail to the Q1-State Highway (STH) 35 Route, including what would happen to any distribution underbuild and all the route adjustments and connections that would be made. What decisions must be made to determine if this rerouting would be done?
2-96	2.1.7 and 2.4	Provide environmental data for removing the Seven Bridges 69 kV line (NSP Marshland-Holland) from the Van Loon, including construction issues that would need to be addressed, and including wetlands crossed, soils and erodability, access plans, etc. Provide overall costs for removal of this segment.
2-96	2.1.7 and 2.4	Provide environmental data for removing the Q1 161 kV line that currently goes through the southern portion of Van Loon, including construction issues that would need to be addressed, and including wetlands crossed, soils and erodability, access plans, etc. Provide overall costs for removal of this segment.
2-97	2.2.4	Provide copies of public outreach mailings and any handouts used at public information meetings for this project. Identify any internet site links that show the information that was shared with the public before, during, and at public information meetings.
2-106 – 2-107, 2.3.5 and Appendix R	2.3.5	Text incorrectly identifies the towns, villages, and cities that the routes cross and is a different list than that included as part of Appendix R. Text and Appendix R have incorrect list of available land use, agricultural, and other plans. Text discusses at length Buffalo County and the village of Holmen only; application should discuss all available land use plans and whether they contain anything significant to the project.
2-106	2.3.5	How does the proposed project affect the management plans for DNR properties that are directly impacted by the proposed routes?
2-114	2.4.1.2	Provide copies of all project-related correspondence to and from the owners of the BNSF, CN, and C&NW railroads and copies of all ROW sharing agreements.
2-114	2.4.1.2	Provide the status and preliminary results of the alternating current study requested by BNSF.
2-115	2.4.1.3	Provide documentation from DOT that shows the proposed sharing of ROW and crossing of interstate or state highway ROWs that is acceptable to DOT and can be permitted.
2-121 – 2-125; Appendix A Table 2	2.4.2.2.7	Resubmit Table 2 with all columns populated. Table 2 has been modified in the application (columns are missing). This table must conform to the table as it appears in the AFR.
2-123	2.4.6	Provide information on how the proposed project will affect land enrolled in the Managed Forest and Forest Crop Law programs. There are a number of plots within the ROW that may be enrolled in managed forest law and forest crop law.
2-126	2.4.3	Identify properties affected by the proposed project ROW that were purchased with LAWCON funds.
2-126	2.4.3.1.5.2	Provide a separate table that identifies all state properties directly affected by the proposed routes. Include the type of property, route and segment numbers, linear distance of impact, wetland impacts, and waterway impacts.

Application Page	AFR	Information Requirement
2-134	2.4.6	Provide correspondence from the federal agencies (e.g. USFWS, USCOE) that documents a willingness to accept or approve impacts to their properties.
2-135	2.4.8	Provide the endangered and threatened species report(s) that satisfies the filing requirements for this section. The report should be filed confidentially and as part of the Application, not as a separate document.
2-135	2.4.8	Discuss the potential location, impacts, and feasibility of a route segment to connect segment 8C to segment 18B to avoid rare bird nesting areas at the Amsterdam Grasslands Area owned by the Mississippi Valley Conservancy.
2-135	2.4.8	Provide historical occurrences (from National Historic Institute (NHI) Database) for the assessment included in sections 2.4.8.1 to 2.4.8.3.
2-135	2.4.8	Paragraph 1 of this Section mentions NHI occurrences within two miles of the route options whereas paragraph 2 begins a summary based on intersection of the occurrences with the route. Provide the summary of rare species occurrences consistent with the two-mile search area by route and route segment and by taxa (i.e. plant or animal group). This response can be combined with the preceding requirement about historical occurrences. Include a separate, but similar table by route and route segment for rare species occurrences noted during the surveys completed specifically for this project, which should be primarily birds and plants.
2-135	2.4.8	Provide a table that summarizes where rare species or potentially suitable habitat for rare species occurs along each project route by route segment. Consider in this response the survey results presented in the Confidential Rare Species and Natural Communities Report (Confidential Report) and the Habitat Summary Tables in addition to the NHI historical and non-historical occurrences. Include staging areas in this analysis. Summarize the information by taxa.
2-136	2.4.8.4	Define “designation” as used here. Provide a citation or reference source for the designated areas identified in Table 2-4-6.
2-137	2.4.8	Summarize by route and by route segment any potential impacts the project could have on NHI species and habitats. Include segments where the applicants have proposed to remove existing lines and co-locate them with the proposed 345 kV line such as the line along Seven Bridges. Discuss impacts based on the proposed construction actions, including access routes, the proposed schedule and construction sequence, and in relation to the habitat of the species.
2-137	2.4.8	Do the habitat maps and tables provided in the Confidential Report include construction and staging areas and any off-ROW access areas? If not, provide this information. Note that Table 6, which is referenced on page 2-137 for additional information on this topic, does not distinguish off-ROW access.
2-137	2.4.8	Describe by taxa how the proposed project could be modified to avoid, minimize, or mitigate any potential adverse effect on the species. It is acceptable to combine species with similar habitat requirements where avoidance, minimization, or mitigation measures may be similar. Provide a detailed description of how “standard construction techniques and construction timing should result in minimal ground disturbance.....”

Application Page	AFR	Information Requirement
2-138	2.4.9, 2.6.8.5, and 2.9.2.3	Provide the archeologist's reports for this project and a list of all historic and archeological sites potentially affected by the proposed project along the routes, connecting segments, alternative segments, staging areas, substation sites, and off-road access routes. For each resource identified, describe how the proposed project might affect it and how the project might be adjusted to reduce or avoid adverse impacts. This information does not have to be confidential. See the attached letter from Chip Harry L. Brown to Kenneth C. Rineer dated March 22, 2002 (Attachment B).
2-138; Table 2.4-7	2.4.9, 2.6.8.5, 2.9.2.3	Table 2.4-7 must clearly show historic properties by town, Range, Section, and 1/4 1/4 section. The third column is not clear.
2-143	2.6.8.6	There is no identification of state-designated trout streams and/or exceptional/outstanding waters. Provide the following information for all areas adjacent to state designated waters: describe the additional construction practices that would be employed to adequately protect the function of these streams.
2-145	2.4.13.3.3	Provide information on identified invasive species occurring in wetlands within all proposed ROWs. Organize by route segment and wetland ID.
2-156	2.5.1	If matting and ice roads are not viable options in wetlands due to site conditions and weather, what construction options will be used? Has helicopter construction been evaluated? If so, provide details including cost.
2-156; Appendix J	2.1.7.1	Show estimated costs assuming that helicopter installation is required for all wetland impacts within the Black River Floodplain.
2-157	2.5.1.7.	Provide a habitat description and description of rare species impacts at each of the staging areas.
2-159	2.5.6.1	Identify locations where there is greater than 10 percent slope; include whether or not these areas are located near/in sensitive areas.
2-160 - 2-161, Section 2.5.1.8.1	2.5.1.8.1	Provide details on mitigation of construction impacts to agricultural lands. Include a discussion of construction practices and recovery options.
2-165-166	2.5.4.1 and 2.5.4.1.1	It is unclear whether "fill" will be used to build access roads in wetlands. It is stated both ways throughout the application. Confirm the methods that will be used to access wetland locations, and what materials may be used.
2-166	2.5.4.2	Provide site specific invasive species plan. Include in that plan how the plan would comply with NR40. DNR staff has not had a discussion with the applicants regarding any pre-construction survey detailing invasive species locations, dominance, and BMPS.
2-167	2.5.5.1, 2.5.5.2	Provide a site specific revegetation and post-construction monitoring plan that includes seed mix, how long and when the site will be monitored, goals for site compliance, what actions will occur if the site does not revegetate, or if the site has an increase of invasive species. Organize the information by natural community or land cover type.
2-168	2.5.6	Provide an erosion control plan that meets all information required in the AFR and the DNR NOI.
2-181-182	2.6.8.4	Identify endangered, threatened, and special concern species or important or valuable natural communities potentially affected by the proposed substation sites.
2-181-182	2.6.8.4	Provide a map and description of habitat present on the alternative substation sites. Describe potential impacts the project could have on such species.

Application Page	AFR	Information Requirement
2-195	2.8.4	Identify state threatened or endangered animal species that may require consultation for Incidental Take or that may require an application for an Incidental Take permit under 29.604. Provide your answer by route and route segment. Describe the impacts or project actions that may result in incidental take to these species based on the route or route segment. This response should be filed confidentially.
2-197; Appendix P	2.9.1,	The letter dated December 23, 2010, to DNR was not sent and should be replaced in this Appendix with the correct letter dated January 10, 2011.
2-202 ; Table 2.9-3	2.9.2.2	Provide a determination by DATCP as to whether or not the project would require an Agricultural Impact Statement (AIS). If an AIS is required, document that the necessary information (Notification Packet) has been provided to DATCP so that the AIS can be prepared in time for staff to fit its analyses into the PSC review timeframe.
2-203	2.9.2.3	Provide copies of any feedback obtained from the three local historical societies that attended the informational meeting and site visit hosted by RUS.
2-203	2.9.3.3	Provide ongoing status updates about milestones reached and the progress achieved in the Minnesota and RUS EIS preparations and project reviews.
Appendix D	2.4.14.3.9	For TCSBs, where are the areas of grading located? All bridge locations should be separately numbered and correlated to the Utility Permit application tables.
Appendix J	2.5.1.4	How deep to the caissons go into the ground?
Appendix J	2.5.1	Will the soils at the STH 35 crossing of the Black River be able to support the vibratory caisson foundations discussed on page 1-18? If not, what other options exist?
Appendix J	2.5.1.8	Document construction techniques for tree clearing along STH 35 Black River crossing.
Appendix J – pg. 4	2.5.1.8	Will stumps be removed from the ROW? Will the holes from the stumps be filled with soil?
Appendix L, Drawing S6-13	2.1.2.1	Provide insulators and conductor information on Drawing.
Appendix M; pg. M-7 - Figure 1	2.3.1	Figure 1, pg. M-7 is not legible. Provide map at a larger size (11"x17").
Appendix U	2.7.1.4.1	Amperage reported on EMF tables for proposed structures report only one current value for each double-circuit configuration. Include amperage for both circuits on each table (e.g. Tables 11 and 11c, the amperage reported for these two tables is identical but the magnetic fields suggest that at least one circuit has a much different amperage value).
Appendix U	2.7.1.5	Phase angles are not provided in the EMF tables.
GIS Data/Digital Data	Pg. 4	Provide published map files in .pmf format for all GIS maps in the Application. The publisher map files do not function properly. Data links are missing on 23 out of the 39 .pmf maps provided.
GIS Data/Digital Data	Pg. 4, 2.6.1	Provide digital copies of substation layouts as prescribed in AFR (AutoCad *.dwg format).
GIS Data/Digital Data	Pg. 4; 2.3.1	Provide shapefiles for distribution lines.
GIS Data/Digital Data	Pg. 4; 2.3.1	Provide a list (Excel spreadsheet) of shapefile, raster, aerial photos, and any other GIS file names. In the list include a detailed description of content of each file, source of the data, and date.
GIS Data/Digital Data	Pg. 4; 2.3.1.2	Provide shapefiles showing federal and state properties or managed lands (refuges, wildlife/fisheries, parks, trails, etc.).

Application Page	AFR	Information Requirement
GIS Data/Digital Data	Pg. 4; 2.3.1.3	Provide shapefiles showing all DOT easements including scenic easements.
GIS Data/Digital Data	Pg. 4; 2.3.4	Provide zoning shapefiles for La Crosse and Trempeleau Counties.
GIS Data/Digital Data	Pg. 4; 2.3.6	Flood plain shapefiles contain different information in the attribute tables. Different levels of flood plain zones are used. For example Buffalo County only has zone A while Trempeleau and La Crosse have many more flood plain zones. Explain why.
GIS Data/Digital Data	2.3.3	No apparent logical naming convention has been used for GIS digital data. Rename GIS files so that the names are logical and information-based.
GIS Data/Digital Data	2.3.3	Clearly label any obsolete route files or files with obsolete route segments. Provide proposed routes as separate shapefiles, and one shapefile that includes all route segments that are in play.
GIS Data/Digital Data	2.3.3	Separate Minnesota data from Wisconsin data and label clearly (e.g. MN_Route_XX or Wis_Route_XX).
GIS Data/Digital Data	2.3.3	Explain why the aerial photos for La Crosse County are in B&W.
GIS Data/Digital Data	2.3.3; 2.4.13.2.2	Provide the NRCS soils shapefiles for Buffalo and La Crosse Counties.
	* Conservation and Load Mgmt.	1. For each load serving entity for the La Crosse study area provide the following: A) The number of residential customers in the La Crosse study area that participate in a direct load program. Break out between air conditioning only and air conditioning with water heating. B) The percentage of residential customers in the study area that participate in a direct load program, broken out by air conditioning only and air conditioning with water heating. C) The coincident load reduction available from the residential customers participating in the these programs in the La Crosse study area.
	Conservation and Load Mgmt.	2. For each load serving entity in the La Crosse study area provide the following: A) The number and percentage of commercial and industrial customers in the La Crosse study area that are on a Commercial Load Control Rider. How much load does this represent? B) The number and percentage of commercial and industrial customers in the La Crosse study area that participate in a Peak Control program. How much load does this represent?
	Conservation and Load Mgmt.	3. Was an energy efficiency analysis conducted to determine if additional energy efficiency is available in the La Crosse study that is not already reflected in the forecast? If so, describe the study method and provide the results.
	Conservation and Load Mgmt.	4. Has NSPW offered its Community Energy Efficiency program in any communities in the La Crosse study area? If so, which ones and when? (This is NSPW's energy efficiency program that provides additional services to residential and small business customers, including bonus incentives, on top of the Focus on Energy incentives, on a rotating basis.)
	Conservation and Load Mgmt.	5. What energy efficiency services have any other load serving entities provided in the La Crosse study area?
		*Conservation and load management information is required because of a Commission decision in docket 137-CE-140. The decision found that simply modeling existing energy efficiency is not adequate to meet the Energy Priorities Law.

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MAR 27 2002

Electric Division



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Kenneth C. Rineer
Historic Preservation Officer
PSC--Electric Division
610 N. Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

March 22, 2002

Re: Confidentiality of Archeological Site Information Pursuant to Wis. Stat. §§ 44.40 and 44.48 (2000)

Dear Mr. Rineer:

Recently, we have discussed the issue of confidentiality of information pertaining to historic properties particularly in the context of project reviews pursuant to Wis. Stat. § 44.40 (2000). In the past, we have maintained that confidentiality of locational information for archeological sites in the State of Wisconsin was appropriate and specifically authorized at § 44.48 Stat.

Based on our recent discussions, I believe that blanket confidentiality requests for archeological site information for all project review submittals is neither appropriate nor necessary. Sources of archeological site information exist outside the context of reports generated pursuant to project reviews. These sources of information are generally accessible to the public.

If a concern about a specific site or group of sites arises such that the release of locational or other information about it or them may result in disturbance to the archeological resource(s), then we may require of your agency and/or the permit applicant that the information in question be held confidential per § 44.48 Stat.

I hope that this letter clarifies the issue of when confidentiality of archeological site information may be necessary. Again, we do not require, nor would we prefer blanket confidential submittals of archeological reports or other information to carry out our responsibilities under § 44.40 Stat.

With any questions, please contact me at (608) 264-6508. Thank you very much for your interest in historic preservation and for your continued attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Chip Harry L. Brown III".

Chip Harry L. Brown III, J.D.
Compliance Coordinator