Item #	Appendix F EIS Topic	Applicant's Response	Comment or Specific Plan
GEOLOGY			
1	□ To reduce the impacts of drilling in unstable material, geotechnical boring would be required before construction to determine the appropriate depth needed to remove soils and weathered bedrock before reaching sound material where substantial excavation or blasting would occur.	Agree	See C&R STANDARDS
2	□ A blasting plan would be prepared and submitted to NPS for review and approval by a blasting expert before construction.	Agree	See C&R STANDARDS
3	□ The blasting plan would include details for the placement of the excavated rock.	Agree	See C&R STANDARDS
4	□ The blasting plan would describe the areal extent of impact from blasting and measures to minimize impact of vibrations and fracturing caused by blasting.	Agree	See C&R STANDARDS
5	□ Following each blast, the ground would be examined for signs of ground cracking or fracturing.	Agree	See C&R STANDARDS
6	□ Excavated rock would be used to the extent possible as substrate for the access roads.	Agree	See C&R STANDARDS
7	□ A preconstruction surface assessment would be completed prior to disturbance, and that if found, resources will be avoided, or if unavoidable, collected and properly cared for before the start of construction.	Agree	See C&R STANDARDS
8	□ Areas with potential paleontological resources must be monitored during construction activities.	Agree	See C&R STANDARDS
9	□ For tower locations abutting and adjacent to limestone fens, alternate techniques, including drilling, would be evaluated to minimize the potential for impact to the fens.	Agree	See C&R STANDARDS
10	□ The applicant would develop a buffer zone, that area beyond which blasting activities would not impact the geology and the fens.	Agree	See C&R STANDARDS
WATER AND SOIL RESOURCES			
11	□ The applicant would prepare a spill prevention and response plan (SPRP) to reduce impacts on surface water, ground water, and aquatic species if equipment leaks or hazardous spills occur. The goal of the plan is to minimize the potential for a spill, contain any spillage to the smallest area possible, and to protect environmentally sensitive areas, including streams, rivers, and wetlands.	Agree	SPILL PREVENTION AND RESPONSE PLAN
12	□ The SPRP would include:		
13	□ Procedures for fuel storage location, fueling activities, and construction equipment maintenance.	Agree	SPILL PREVENTION AND RESPONSE PLAN
14	□ Lines of communication to facilitate the prevention, response, containment, and cleanup of spills during construction activities.	Agree	SPILL PREVENTION AND RESPONSE PLAN
15	□ Access roads would have a gravel surface, which is semipermeable to reduce the amount of stormwater runoff. A reduction in sheet flow would decrease the amount of sedimentation, total suspended soils, contaminants, nutrients, and turbidity in surface waters and impacts on aquatic species.	Agree	See C&R STANDARDS
16	□ Spur roads would be constructed using geotextile fabric and stone, which would be removed at the conclusion of construction, and revegetated.	Agree	See C&R STANDARDS - this practic would for all temporary access roads
17	□ To reduce the runoff potential of soils along the access roads outside the ROW, road grades and alignments would follow the contour of the land with smooth, gradual curves.	Agree	See C&R STANDARDS

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18	☐ Potential erosion areas would be inspected weekly or immediately after storm events. Ruts would be smoothed out and gravel would be spread to stabilize the roadway and prevent erosion.	Agree	See C&R STANDARDS
19	☐ Soil and erosion control plans would be developed and implemented as mandated in state permits for PADEP and NJDEP.	Agree	See C&R STANDARDS
20	☐ Erosion control methods such as silt fences and straw bales would be implemented during and after construction to reduce impacts of increased soil runoff on water resources. By retaining soil on-site, sediment and attached nutrients are prevented from leaving disturbed areas and polluting streams. The use of BMPs is estimated to reduce TSS by 40 percent, total nitrogen by 25 percent, and total phosphorus by 40 percent (Baldwin n.d., 1).	Agree	See C&R STANDARDS
21	☐ Removal of vegetation would include use of herbicides approved for aquatic environments	Agree	See C&R STANDARDS
22	☐ A 50-foot buffer would be established near intermittent streams and a 100-foot buffer would be established for perennial streams to reduce impacts on water quality and aquatic species	Agree	See C&R STANDARDS - these buffers will be met except where needed for temporary construction.
23	☐ To reduce impacts of blasting on aquatic communities, blasting would occur during winter months when not in areas with known snake dens. Winter is when the least number of aquatic species and individuals are present in nearby water bodies.	Agree	See C&R STANDARDS
FLOODPLAINS			
24	☐ Avoid construction or clearing vegetation within floodplains and floodplain buffers.	Agree	The Applicant will attempt to accomplish to the extent practicable for construction of the project.
25	☐ Construct dikes or conveyance ditches to divert or carry flood flows away from the site.	Agree	See C&R STANDARDS
26	☐ Modify structures to provide sufficient elevation above the flood crest (e.g., place structures on columns, walls, piles, or piers).	NA	Structures are designed to withstand flooding impacts
27	☐ Restore watershed conditions to eliminate accelerated runoff caused by soil compaction, poor vegetation cover, or the unnatural conveyance of water by roads, ditches, or trails.	Agree	See C&R STANDARDS
28	☐ Compensate lost natural floodplain values.	Agree	Structures will have negligible impact on the flood storage.
WETLANDS			
29	☐ Replacing or double-circuiting an existing line rather than building a new line, which has the following advantages:	Agree	This is an NPS comment
30	☐ Little additional ROW clearing, because the new line would be placed in the center of the existing ROW.	Agree	This is an NPS comment
31	☐ No additional changes to land use patterns, because they have already adapted to the existing ROW.	Agree	This is an NPS comment
32	☐ Designing access roads to avoid wetlands wherever possible, including 50-foot buffers surrounding wetland areas where construction would not occur wherever possible, and full vegetation clearing would not be allowed.	Agree	WETLANDS AND RIPARIAN ZONE PLAN
33	☐ During construction, timber mats would be used in areas outside the access roads to minimize soil compaction.in addition to the access roads, crane pads and pull sites.	Agree	See C&R STANDARDS
34	☐ Staging, tower, and pulling and splicing locations would be located to avoid wetlands and rare and unique communities inside and outside the study area wherever possible. During planning, design engineers would work closely with park staff to avoid these areas within park boundaries.	Agree	WETLANDS AND RIPARIAN ZONE PLAN

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35	4 Spanning wetlands with towers wherever possible.	Agree	WETLANDS AND RIPARIAN ZONE PLAN
36	□ Limiting construction to winter months when soil and water are more likely to be frozen and vegetation is dormant.	Agree	WETLANDS AND RIPARIAN ZONE PLAN
37	□ Using mats and wide-track vehicles whenever possible when crossing wetlands, because some wetlands never freeze.	Agree	WETLANDS AND RIPARIAN ZONE PLAN
38	□ Carefully cleaning construction equipment after working in areas infested with known invasive and/or exotic plant species.	Agree	WETLANDS AND RIPARIAN ZONE PLAN
39	□ Director's Order 77-1 states that for new actions where impacts on wetlands cannot be avoided, proposals must include plans for compensatory mitigation that restores wetlands on NPS lands, where possible, at a minimum acreage ratio of 1:1. This compensatory mitigation would be required where clearing in a wetland would occur, as clearing is considered a loss.	Agree	WETLANDS AND RIPARIAN ZONE PLAN
VEGETATION			
40	□ An NPS approved, long-term, park-specific vegetation management plan from both utilities would be developed and implemented for the operation and maintenance of the line. These plans would address invasive species management, including early detection, monitoring, and treatment for target invasive species using an integrated pest management approach. Additionally, an invasive species management plan would address the possible spread of invasive species via wooden spools used to supply wire. Other topics in the vegetation management plan would include vegetation restoration (native seeding and plantings, with annual monitoring and retreatment as needed to achieve minimum acceptable outcomes); management of sensitive species and sensitive habitats during routine maintenance; the use of best management practices to include restrictions on use of machinery and equipment time-of-year restrictions on vegetation in sensitive areas; pre-approval by NPS on pesticide and herbicide use; and off-site compensation. The vegetation management plan would also include an equipment cleaning plan that would address techniques for removal of a	Agree	ROW VEGETATION MANAGEMENT PLAN
41	□ The area to be cleared would be clearly delineated to minimize the amount of vegetation removed.	Agree	ROW VEGETATION MANAGEMENT PLAN
42	□ Wetlands would be clearly delineated prior to clearing activities and avoided during these activities, where possible; however, wooded wetlands would be subject to tree clearing if noncompatible species were present.	Agree	See C&R STANDARDS
43	□ Existing roads would be used with minimal development of new access roads.	Agree	See C&R STANDARDS The proposed new southern access road would reduce overall length, avoid impacts to bog turtles and cultural sites when compared to use of the existing road.
44	□ Areas disturbed during construction of the transmission line would be seeded promptly with a conservation mix approved by NPS and monitored for the spread of invasive plant species.	Agree	See C&R STANDARDS
45	□ Maintenance crews would enter the ROW on foot and use handheld equipment for vegetation maintenance in sensitive areas.	Agree	ROW VEGETATION MANAGEMENT PLAN
46	□ Disturbance to native plant species would be minimized to the greatest extent possible during construction and maintenance to prevent the spread of non-native species.	Agree	See C&R STANDARDS
47	□ Equipment would be cleaned after leaving areas where invasive species are known to occur and before entering sensitive areas.	Agree	See C&R STANDARDS

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48	☐ All materials (e.g., gravel) used in the construction area would be from sources that had been inspected and found to be free of invasive species.	Agree	See C&R STANDARDS
49	☐ To decrease the potential for spreading invasive species, mulched or chipped vegetation would not be used in areas of the parks outside the area in which the vegetation was removed.	Agree	See C&R STANDARDS
50	☐ During construction, timber mats would be used in areas outside the access roads to minimize soil compaction. In addition to the access roads, crane pads and pull sites	Agree	See C&R STANDARDS
51	☐ The applicant would be required to complete measures for the annual suppression of invasive plants within the ROW, for the life of the project. Additionally, the applicant would be required to complete this same suppression in the decommissioned ROW for the applicable alternatives (3-5).	Agree	ROW VEGETATION MANAGEMENT PLAN Agree for Alternative Route 2 & 2b
LANDSCAPE CONNECTIVITY,WILDLIFE HABITAT, AND WILDLIFE			
52	☐ A seasonal restriction on maintenance activities from March 15 through July 31 would be imposed to prevent unauthorized take of nests and unfledged chicks protected under the MBTA. An avian protection plan (APP) will be developed and would be a condition of the applicant's permit. A summary of an example APP is included in appendix F-2.	Agree	AVIAN PROTECTION PLAN
53	☐ A seasonal restriction on maintenance activities in March and April would be imposed in areas of known amphibian migration to prevent direct mortality of spring peepers, wood frogs, spotted salamanders, red spotted newts, and Jefferson salamanders.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN Agreed that this applies only to mechanized clearing. Except for NERC compliance, emergency and danger tree situations
54	☐ Following the clearing of vegetation, brush piles would be left alongside the ROW to provide habitat for a variety of wildlife species.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
55	☐ Spur roads would be removed, and the ROW would be maintained to provide bird habitat.	Agree	AVIAN PROTECTION PLAN Temporary access will be removed and restored. Bird habitat will be enhanced to the extent practicable.
56	The following bird-safe standards and design components will be employed to minimize bird electrocution (PSE&G 2010, 23):	Agree	AVIAN PROTECTION PLAN
57	☐ APLIC-recommended eagle-safe standards will be used in areas that contain known eagle nests or foraging habitats; these standards require at least 60 inches of horizontal and 48 inches of vertical separation of energized and grounded parts of electrical equipment.	Agree	AVIAN PROTECTION PLAN
58	☐ An alternative raptor-safe design standard will be used in areas where eagles are unlikely to occur but that contain nests or habitats for raptor species; this design standard includes a clearance of 48 inches to minimize electrocution potential based on the wing length (and wrist-to-wrist distance) of certain raptors.	Agree	AVIAN PROTECTION PLAN
59	☐ APLIC-recommended bird-safe standards will be used for areas with concentrations of tall birds (wading birds, including herons and egrets); these standards require at least 60 inches of horizontal and 60 inches of vertical separation of energized and grounded parts of electrical equipment.	Agree	AVIAN PROTECTION PLAN
60	The following design components will be employed to minimize bird collisions with the lines (PSE&G 2010, 23):	Agree	AVIAN PROTECTION PLAN

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61	☐ Flight diverters or transmission line markers will be used where technically feasible for the static wires to reduce collision hazards in areas known to support species of birds that are at higher risk of collision and areas with topographic features and habitats that could attract concentrations of breeding or migrating birds.	Agree, but need to discuss with NPS & USFWS	AVIAN PROTECTION PLAN Discussion is needed on effectiveness of flight diverters. Marker balls to be used if required by FAA.
62	☐ OPGW will be used for the transmission line, which is larger in profile than typical stand-alone ground wire and will be roughly 0.2 inch thicker than the existing wires on the S-R Line and should be more visible to birds.	Agree	AVIAN PROTECTION PLAN
63	☐ Bundled conductors will be used to make the transmission lines more visible to birds than a nonbundled configuration; each bundled conductor will consist of three wires grouped together with spacers separating the wires.	Agree	AVIAN PROTECTION PLAN Bundled conductor will only be used on the 500 kV side, the 230 kV side will only have one conductor.
SPECIAL STATUS SPECIES			
64	☐ Preconstruction surveys would be conducted for presence of special-status species, habitat, nests, dens, and new hibernacula. This is particularly important because construction would not occur for some time following the completion of the NEPA process and special-status species could begin using habitat between site surveys and construction activity. If special-status species, nests, dens, or habitats are found, then the suitable habitat would be flagged and avoided during construction if possible.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN May not be applicable during certain times of the year
65	☐ Potentially, the modification of the placement of towers, access roads, laydown areas, and other ground-disturbing activities would be implemented in order to avoid areas that support special status species.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
66	☐ Prior to any ground-disturbing or vegetation clearing activities, a qualified biologist would conduct pre-construction surveys for special status species, and determine if relocation was an appropriate mitigation measure for any species found. It is possible that some species such as reptiles, amphibians, and mussels identified during the preconstruction surveys could be collected and relocated prior to or during construction activities, if this was found to be beneficial or appropriate for the species present at the site. If relocation were to be undertaken, a plan for the relocation of the special status species would be designed in accordance with the appropriate federal and state agencies and a qualified and permitted biologist would collect and relocate individuals to nearby suitable habitat.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN May not be applicable during certain times of the year
67	☐ If special status plant populations could not be avoided, consultations with appropriate federal and state agencies might be required, depending on the listing status of the species present. These consultations would determine appropriate mitigation measures for any populations affected by the proposed project. Appropriate measures could include the creation of offsite populations through seed collection or transplanting, preservation, and enhancement of existing populations, or restoration or creation of suitable habitat in sufficient quantities to compensate for the impact.	NA	CRITICAL HABITAT - ENDANGERED SPECIES PLAN No plant species of this type have been identified within the project area
68	☐ Translocation includes digging up plants and moving them to appropriate portions of the corridor that would not be affected by the proposed construction activities.	NA	CRITICAL HABITAT - ENDANGERED SPECIES PLAN

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69	☐ Seeds can also be collected from plants that will be removed and either planted directly or germinated in a nursery and then planted in appropriate locations.	NA	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
70	☐ If special–status wildlife species or occupied habitat cannot be avoided, mitigation would include species-specific Conservation and Mitigation plans to be prepared and implemented by recognized and qualified zoologists, including individuals certified by the USFWS or state conservation agencies. These individuals would complete on-site monitoring. These plans would include:	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
71	☐ Conservation measures, such as time-of-year restrictions.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
72	☐ Pre-construction surveys.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
73	☐ Construction monitoring.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
74	☐ Habitat preservation habitat restoration components.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
75	☐ Post-construction monitoring as needed.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
76	☐ Park staff or representatives from appropriate, state or federal agencies who were experienced in managing or monitoring special status species would also be on site to monitor for special-status species during the construction activities to verify that special-status species are not in the active construction area.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN Need to discuss potential overlapping restrictions, redundancies, time-of-year exclusions, and Safety concerns.
77	☐ An Avian Protection Plan (APP) would be completed in accordance with the Bald Eagle Guidelines (USFWS 2007) and APLIC standards would be a condition of the applicant's permit.	Agree	AVIAN PROTECTION PLAN
78	Some of the proposed alternatives are not consistent with the Bald Eagle Guidelines, as discussed in the EIS.	NA	AVIAN PROTECTION PLAN Alternative 2 & 2b are consistent with the Bald Eagle guidelines
79	☐ The APP would include elements that provide for training for all utility and contractor personnel on compliance with applicable regulations, procedures to be implemented for avoidance and minimization of disturbance, reporting bird mortality, required permits, accepted construction standards for reducing bird impacts, methodology for evaluation of risks to migratory birds, opportunities for enhancement of bird populations or habitat, public awareness and education, and identification of key resources.	Agree	AVIAN PROTECTION PLAN
80	☐ The standards described in APLIC (1994) would be followed and would also comply with the	Agree	AVIAN PROTECTION PLAN
81	APLIC *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006* (APLIC 2006).	Agree	AVIAN PROTECTION PLAN
82	☐ Proposed construction and maintenance activities would follow and adhere to the Bald Eagle Guidelines (USFWS 2007), which would minimize the potential for "take" on the bald eagle.	Agree	AVIAN PROTECTION PLAN
83	☐ To reduce impacts on birds from collisions with the transmission line, the APP (PSE&G 2010) would be written in compliance with APLIC standards and would use the current best available technologies.	Agree	AVIAN PROTECTION PLAN
84	☐ Invasive plant species would continue to be identified and controlled through the applicant's invasive plant management plans. In addition, an aggressive invasive plant management plan developed and implemented by the applicant would include ongoing monitoring and treatment.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN

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85	☐ Rare species, especially plants and small reptiles and amphibians, are vulnerable to illegal collecting, and even small numbers collected annually for a number of years could jeopardize the local population, as demonstrated by Garber and Burger (1995).	N/A	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
86	☐ Existing and proposed new access roads, especially access roads, could act as an attractive nuisance and/or recreation opportunity, by inviting visitors to areas inhabited by rare species and increasing visitor encounters with these species.	N/A	The applicant will work with NPS to address this concern
87	☐ It has been demonstrated by Garber and Burger (1995, 1152 and 1158) that when formerly intact, undisturbed, forested areas are opened to human recreation, the extinction of special status species can occur in that particular area.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
88	☐ To reduce the impacts of illegal collection or harassment of special-status species, access roads would be closed to the public and law enforcement would monitor illegal activities in these areas, if this were deemed practical and/or effective. There would be an increase in patrols along the access roads and any new ROW.	N/A	The applicant will work with NPS to address this concern as it relates to the project
89	☐ Law enforcement, resource staff would monitor these areas for invasive species, vegetation, wildlife, and erosion, and the presence of park staff may dissuade visitors from entering these illegal areas.	Agree	The applicant will work with NPS to address this concern as it relates to the project
90	☐ Road closures and/or patrols prior to and during construction activities at locations where it was deemed effective to implement these measures.	Agree	The applicant will work with NPS to address this concern as it relates to the project
91	☐ Seasonal restrictions would be implemented to reduce impacts on special-status species. Seasonal restrictions would be site specific, based on species present and their use of the site and include the following:	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
92	☐ Seasonal restrictions on tree clearing from March 15 through July 31 would prevent the unauthorized take of nests and unfledged chicks of birds protected by the MBTA (USFWS 2010). This seasonal restriction would protect the majority of the special-status bird fledglings that may occur in the study areas for each alternative. Therefore, the permanent and seasonal resident nesting special-status bird species would not be forced to abandon nests or young, because tree clearing would not occur during the nesting season; no direct mortality of eggs, young, or adults would occur as a result.	Agree	AVIAN PROTECTION PLAN Except for NERC compliance, emergency and danger tree situations
93	☐ Seasonal restrictions for disturbance of bald eagles would include a restriction within 1,000 feet of bald eagle nests between December 15 and August 31, the bald eagle nesting period. This restriction is recommended in the Bald Eagle Guidelines (USFWS 2007).	Agree	AVIAN PROTECTION PLAN No known BE nests within this range for Alts 2 & 2b
94	☐ Seasonal restrictions for tree clearing and construction would be implemented from December 15 to March 31 in the vicinity of bald eagle roosts.	Agree, but need to discuss with NPS & USFWS	AVIAN PROTECTION PLAN The Applicant will need to coordinate construction timing restictions with the outage periods to safely construct the project.
95	☐ To prevent cutting of potential roost trees for the Indiana bat, a season restriction from April 1 through September 30, which includes the restriction of cutting trees with a DBH greater than 8.7 inches would be implemented.	Agree, but need to discuss with NPS & USFWS	CRITICAL HABITAT - ENDANGERED SPECIES PLAN The applicant will need to coordinate construction timing restictions with the outage periods to safely construct the project.

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96	☐ A seasonal restriction from April 1 through October 31 preventing the cutting of all trees or snags with a DBH greater than 5 inches would be implemented to avoid potential impacts on northern myotis and other tree-roosting bats.	Agree, but need to discuss with NPS & USFWS	CRITICAL HABITAT - ENDANGERED SPECIES PLAN Indianna bats have not been identified on site through mist nest studies.
97	☐ In areas with known snake dens, blasting activities are recommended to occur between April and September, after special-status snake species have left overwintering dens.	Agree, but need to discuss with NPS & USFWS	CRITICAL HABITAT - ENDANGERED SPECIES PLAN The applicant will need to coordinate construction timing restictions with the outage periods to safely construct the project.
98	☐ Seasonal restrictions for Neotropical birds and bats would also benefit nesting and birthing reptile species in the spring and summer.	Agree, but need to discuss with NPS & USFWS	CRITICAL HABITAT - ENDANGERED SPECIES PLAN The applicant will need to coordinate construction timing restictions with the outage periods to safely construct the project.
99	☐ Seasonal restrictions on construction and road use to protect wood turtles during their active season (late April/mid- May through late September/early November).	Agree, but need to discuss with NPS & USFWS	CRITICAL HABITAT - ENDANGERED SPECIES PLAN The applicant will need to coordinate construction timing restictions with the outage periods to safely construct the project.
100	Various measures to specifically protect bog turtles would be undertaken in accordance with the *Bog Turtle (*Clemmys muhlenbergii*) Northern Population Recovery Plan* (USFWS 2001), and the bog turtle conservation zones presented in Appendix A of this document. These actions would be undertaken where appropriate as mitigation measures. Future coordination with appropriate Federal and State agencies would clarify the extent to which adverse effects to the bog turtle would be likely to occur and would determine whether a BA would be required. The FEIS and the BA for this project will include more details concerning impacts and mitigation measures to the bog turtle as appropriate. The following bog turtle conservation zones have been designated with the intent of protecting and recovering known bog turtle populations within the northern range of this species. The conservation suggestions for each zone are meant to guide the evaluation of activities that may affect high-potential bog turtle habitat, potential travel corridors, and adjacent upland habitat that may serve to buffer bog turtles from indirect effects. Nevertheless, it is important to r	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
101	☐ **Zone 1**: This zone includes the wetland and visible spring seeps occupied by bog turtles. Bog turtles rely upon different portions of the wetland at different times of year to fulfill various needs; therefore, this zone includes the entire wetland (the delineation of which will be scientifically based), not just those portions that have been identified as, or appear to be, optimal for nesting, basking or hibernating. In this zone, bog turtles and their habitat are most vulnerable to disturbance; therefore, the greatest degree of protection is necessary. Within this zone, the following activities are likely to result in habitat destruction or degradation and should be avoided. These activities (not in priority order) include:	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
102	☐ development (e.g., roads, sewer lines, utility lines, storm water or sedimentation basins, residences, driveways, parking lots, and other structures)	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
103	☐ wetland draining, ditching, tiling, filling, excavation, stream diversion and construction of impoundments	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
104	☐ heavy grazing	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
105	☐ herbicide, pesticide or fertilizer application	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN

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106	☐ mowing or cutting of vegetation	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
107	☐ mining	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
108	☐ delineation of lot (e.g., for development, even if the proposed building or structure will not be in the wetland)	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
109	☐ Some activities within this Zone 1 may be compatible with bog turtle conservation but warrant careful evaluation on a case-by-case basis:	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
110	☐ light to moderate grazing	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
111	☐ non-motorized recreational use (e.g., hiking, hunting, fishing)	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
112	– **Zone 2**: The boundary of this zone extends at least 300 feet from the edge of Zone 1 and includes upland areas adjacent to Zone 1. Activities in this zone could indirectly destroy or degrade wetland habitat over the short or long-term, thereby adversely affecting bog turtles. In addition, activities in this zone have the potential to cut off travel corridors between wetlands occupied or likely to be occupied by bog turtles, thereby isolating or dividing populations and increasing the risk of turtles being killed while attempting to disperse. Some of the indirect effects to wetlands resulting from activities in the adjacent uplands include:	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
113	☐ changes in hydrology (e.g., from roads, detention basins, irrigation, increases in impervious surfaces, sand and gravel mining);	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
114	☐ degradation of water quality (e.g., due to herbicides, pesticides, oil and salt from various sources including roads, agricultural fields, parking lots and residential developments);	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
115	☐ acceleration of succession (e.g., from fertilizer runoff); and	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
116	☐ introduction of exotic plants (e.g., due to soil disturbance and roads).	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
117	Zone 2 acts as a filter and buffer, preventing or minimizing the effects of land-use activities on bog turtles and their habitat. This zone is also likely to include at least a portion of the groundwater recharge/supply area for the wetland. Activities that should be avoided in this zone due to their potential for adverse effects to bog turtles and their habitat include:	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
118	☐ development (e.g., roads, sewer lines, utility lines, storm water or sedimentation basins, residences, driveways, parking lots, and other structures)	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
119	☐ mining	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
120	☐ herbicide application	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
121	☐ pesticide or fertilizer application	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
122	☐ farming (with the exception of light to moderate grazing - see below)	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
123	☐ certain types of stream-bank stabilization techniques (e.g., rip-rapping)	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
124	☐ delineation of lot (e.g., for development, even if the proposed building or structure will not be in the wetland)	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN

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125	□ Careful evaluation of proposed activities on a case-by-case basis will reveal the manner in which, and degree to which activities in this zone would affect bog turtles and their habitat.	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
126	Assuming impacts within Zone 1 have been avoided, evaluation of proposed activities within Zone 2 will often require an assessment of anticipated impacts on wetland hydrology, water quality, and habitat continuity. Activities that are likely to be compatible with bog turtle conservation but that should be evaluated on a case-by-case basis within this zone include:	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
127	□ light to moderate grazing	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
128	□ non-motorized recreational use (e.g., hiking, hunting, fishing)	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
129	□ mowing or cutting of vegetation	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
130	□ **Zone 3**: This zone includes upland, wetland, and riparian areas extending either to the geomorphic edge of the drainage basin or at least one-half mile beyond the boundary of Zone 2. Despite the distance from Zone 1, activities in these areas have the potential to adversely affect bog turtles and their habitat. This particularly applies to activities affecting wetlands or streams connected to or contiguous with Zone 1, because these areas may support undocumented occurrences of bog turtles and/or provide travel corridors. In addition, some activities (e.g., roads, groundwater withdrawal, water/stream diversions, mining, impoundments, dams, "pump-and treat" activities) far beyond Zone 1 have the potential to alter the hydrology of bog turtle habitat, therefore, another purpose of Zone 3 is to protect the ground and surface water recharge zones for bog turtle wetlands. Where the integrity of Zone 2 has been compromised (e.g., through increases in impervious surfaces, heavy grazing, channelization of stormwater runoff), there is also a higher risk of activities in Zone 3 altering the water chemistry of bog turtle wetlands (e.g., via nutrient loa	Agree	CRITICAL HABITAT - ENDANGERED SPECIES PLAN
ARCHEOLOGY			
131	□ Preserving a site that contains archeological resources by avoiding the disturbance or destruction of potential resources. Site areas might be cordoned off and deliberately avoided by construction activities, thereby preserving the potential resource for future scientific study.	Agree	See C&R STANDARDS
132	□ At known archeological sites, data recovery would occur, which in most situations would involve substantial excavation for the purpose of recovering a sample of the significant data contained in the site, as well as detailed analyses of the recovered data. However, DEWA maintains a 100% standard for data recovery, which exceeds both state and federal standards. This, in the event that data recovery excavations are required within NPS boundaries, the site would be fully excavated.	Agree if Applicable	Archeological Investigations completed to date have not revealed known archelogical sites that would be impacted by the construction.
133	□ Alternative mitigation measures may also be required such as the development of exhibits and other kinds of interpretive materials. While such measures are not an alternative to DEWA's practice of 100% site excavation, alternative mitigation measures would be developed and would include input from all interested parties in the project.	Agree if Applicable	Archeological Investigations completed to date have not revealed known archelogical sites that would be impacted by the construction.
134	□ Subsequently, some kind of public-oriented presentation is done, such as building a display or exhibit showing artifacts, graphics, and text explaining why the site was dug. The exhibit can be permanent or portable.	Agree if Applicable	Archeological Investigations completed to date have not revealed known archelogical sites that would be impacted by the construction.

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135	☐ Alternatively, a public document can be produced, such as a book, booklet, or pamphlet about the site that can be made available to the public.	NA	Archeological Investigations completed to date have not revealed known archelogical sites that would be impacted by the construction.
HISTORIC ARCHITECTURE			
136	☐ Some of these adverse visual impacts may be mitigated through strategic placement of transmission towers to be as visually unobtrusive as possible. Adverse visual impacts can also be mitigated through selection of color and finish that blend in with the vegetation of the area.	NA	See Applicant's Mitigation Compensation for Unavoidable Impacts proposal
137	☐ Some of these adverse visual impacts may be mitigated through placement of trees and other vegetation between the historic architectural resource and the transmission line. These measures are most effective in situations where the transmission line is sufficiently far removed from the historic structure so as to be mostly or totally hidden from view by vegetative screening. In the best of circumstances, however, towers, lines, and ROW may still be visible five months of the year (November - March) when leaves are off the trees).	NA	See Applicant's Mitigation Compensation for Unavoidable Impacts proposal
138	☐ Some of these adverse visual impacts may be mitigated through preparation of materials that interpret the history and architecture of the study area to the public at large. Possible work products include published histories, websites, brochures, exhibits, wayside panels, and driving/walking tours.	NA	See Applicant's Mitigation Compensation for Unavoidable Impacts proposal
139	☐ Mitigation can also include improving the physical condition of other structures.	NA	See Applicant's Mitigation Compensation for Unavoidable Impacts proposal
CULTURAL LANDSCAPES			
140	☐ Design modifications, which could include both strategic placement of the transmission towers to be as visually unobtrusive as possible and selections of color and finish of the towers that might blend them more into the surrounding landscape.	NA	See Applicant's Mitigation Compensation for Unavoidable Impacts proposal
141	☐ Alignments should be at lower elevations or behind higher elevations to mitigate visual impacts of the corridor.	NA	See Applicant's Mitigation Compensation for Unavoidable Impacts proposal
142	☐ Any design changes to the towers should be discussed and reviewed before action is taken.	NA	See Applicant's Mitigation Compensation for Unavoidable Impacts proposal
143	☐ Some of the current efforts to conceal cell towers by giving them the appearance of an artificial tree only call more attention to the tower, failing to mitigate the visual impact. Colors and finish that blend more with the landscape might be more desirable.	NA	See Applicant's Mitigation Compensation for Unavoidable Impacts proposal
144	☐ Some of these adverse visual impacts may be mitigated through placement of trees and other vegetation between the cultural landscape resources and the transmission line corridor. These measures are most effective in situations where the transmission line is sufficiently far removed from the resource so as to be mostly or totally hidden from view by vegetative screening. Landscape plans in and around the corridor alignment should be developed as mitigation measures for cultural landscapes.	NA	See Applicant's Mitigation Compensation for Unavoidable Impacts proposal

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145	☐ Adverse impacts occur to the vernacular component cultural landscapes in some situations where the historic viewshed from the site contains the tower corridor. In this case, planting plans can be developed to screen the towers and the historic viewshed can be interpreted on the site. Interpretation should also include the evolution of the cultural landscapes through use by the people whose occupancy and activity shaped the landscape.	NA	See Applicant's Mitigation Compensation for Unavoidable Impacts proposal
146	☐ Some of these adverse visual impacts may be mitigated through preparation of materials that interpret the larger cultural landscapes of the study area as well as the component vernacular cultural landscapes in the study area to the public at large. Possible work products include published histories, websites, brochures, exhibits, wayside panels and driving/walking tours.	NA	See Applicant's Mitigation Compensation for Unavoidable Impacts proposal
147	☐ Mitigation can also include improving the physical condition of other cultural landscapes.	NA	See Applicant's Mitigation Compensation for Unavoidable Impacts proposal
INFRASTRUCTURE, ACCESS AND CIRCULATION			
148	Prior to Construction Activities:		
149	☐ Develop a construction staging plan with the NPS and other parklands.	Agree	See C&R STANDARDS
150	☐ Develop a traffic control plan in conjunction with NPS, other parklands, and local jurisdictions.	Agree	See C&R STANDARDS
151	☐ Work with NPS and affected agencies to develop a cooperative agreement for the control of unauthorized public access and use on NPS and other federal and state lands that could result from the proposed project.	Agree	See C&R STANDARDS
152	☐ The agreement would address various provisions related to unauthorized access, such as:	Agree	See C&R STANDARDS
153	☐ Additional measures to be taken to discourage unauthorized use of the project corridor and associated access roads.	Agree	See C&R STANDARDS
154	☐ Periodic inspection for unauthorized access and any resulting damage.	Agree	See C&R STANDARDS
155	☐ Repair of any damage from unauthorized access.	Agree	See C&R STANDARDS
156	☐ Develop a media strategy/notification plan as a means to notify local residents, businesses, and officials of closures and changes in traffic patterns.	Agree	See C&R STANDARDS
157	During Construction Activities:		
158	☐ Design and construct new access roads to minimize runoff and soil erosion.	Agree	See C&R STANDARDS
159	☐ Install gates at the entrances to access roads to reduce unauthorized use. Coordinate gate locks with landowners.	Agree	See C&R STANDARDS
160	☐ Restore public roadways to their pre-construction conditions or better upon completion of project construction activities.	Agree	See C&R STANDARDS
161	☐ Reclaim any road-related disturbance areas after construction is completed.	Agree	See C&R STANDARDS
VISUAL RESOURCES			
162	During Project Design several mitigation measures would be undertaken. Measures under APLIC to decrease bird collisions and electrocutions would supersede visual resource mitigation measures that directly contradict those found under the APLIC guidelines in areas where both sets of mitigation measures would be applicable:	Agree, but need to discuss with NPS & USFWS	AVIAN PROTECTION PLAN Applicant's design meets APLIC guidelines
163	☐ Locate new access roads within previously disturbed areas wherever possible.	Agree	See C&R STANDARDS

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164	☐ Route the alignment of new access roads to follow landform contours where practicable, possible, providing that such alignment does not impact additional resource values, to minimize ground disturbance and/or reduce scarring (visual contrast) of the landscape.	Agree	See C&R STANDARDS
165	☐ Place structures in designated areas so as to avoid sensitive features such as, but not limited to, riparian areas, water courses, and cultural sites, and/or to allow conductors to clearly span the features, within limits of standard tower design. If the sensitive features cannot be completely avoided, towers would be placed so as to minimize the disturbance.	Agree	
166	☐ Place tower structures at the maximum feasible distance from roadway and trail crossings, and where preservation of existing vista(s) is particularly important. Distances would be within the limits of standard tower structure design.	Agree, but need to discuss with NPS & USFWS	
167	☐ Use non-reflective neutral colored paints and coatings approved by the NPS to reduce reflection, glare, and/or contrast on structures.	NA	See Applicant's Mitigation Compensation for Unavoidable Impacts proposal
168	" Use non-reflective insulators (i.e., non-ceramic or porcelain).	No	500 kV standard is toughened glass
169	☐ Use non-specular conductors to reduce reflectivity.	Agree	
170	" Locate construction staging areas away from visually sensitive locations.	Agree	See C&R STANDARDS
171	" Conceptual landscaping in the form of vegetation planted outside but along the utility ROW.	Agree, but need to discuss with NPS	
172	During Construction and Maintenance Activities:		
173	☐ Restrict construction vehicle movement outside the ROW to NPS-approved routes. Should additional road access be required, permission must be granted by the NPS prior to disturbance, and appropriate remuneration fees would be assessed.	Agree, but need to discuss with NPS	See C&R STANDARDS
174	☐ Keep areas around the towers clean and free of debris.	Agree	See C&R STANDARDS/ROW VMP
175	☐ Maintain a clean construction site and remove all related equipment, materials, and litter following construction.	Agree	See C&R STANDARDS
176	" Preserve vegetation within the 150-foot-wide right-of-way that would not interfere with maintenance access needs.	Agree	ROW VEGETATION MANAGEMENT PLAN
177	☐ Revegetate disturbed areas with approved species.	Agree	See C&R STANDARDS
178	" Provide regular maintenance of access roads and fences within and leading to the corridor.	Agree	See C&R STANDARDS
179	☐ Cut stumps close to ground.	Agree	See C&R STANDARDS
180	" Implement "low-impact tree clearing" which involves directional tree-felling, both mechanically and by hand.	Agree	See C&R STANDARDS
181	☐ Rehabilitate and/or restore disturbed areas.	Agree	See C&R STANDARDS
SOUNDSCAPES			
182	☐ Comply with county and city noise ordinances.	Agree	See C&R STANDARDS
183	" Provide advanced notice of construction to affected residences, businesses, and public facilities.	Agree	See C&R STANDARDS
184	☐ Install sound-control devices on all construction equipment.	Agree	May not be possible on "all" construction equipment.
185	☐ Install muffled exhaust on all construction equipment and vehicles except helicopters, if used.	Agree	May not be possible on "all" construction equipment.
186	4 Limit construction activities to daytime hours.	Agree, but need to discuss with NPS	Construction schedule needs to be also coordinated with T&E construction related timing restrictions.
VISITOR USE			
187	☐ Develop an OHV/ATV deterrent plan prior to construction activities.	Agree	See C&R STANDARDS

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188	" Coordinate construction schedules with NPS and other managers of affected recreation areas to avoid peak visitor use periods and notify visitors of construction.	Agree	See C&R STANDARDS
189	□ Permanently close and revegetate spur roads to discourage OHV/ATV use. For roads still in use, restrict access by unauthorized users as identified in the OHV/ATV deterrent plan. (See Infrastructure, Access, and Circulation for similar mitigation measures).	Agree	See C&R STANDARDS
190	□ Prior to construction develop a media strategy/notification plan as a means to notify local residents and visitors of closures.	Agree	See HEALTH AND SAFETY PLAN
HEALTH AND SAFETY			
191	□ Safety and emergency plans for the project would be developed prior to construction activities.	Agree	See HEALTH AND SAFETY PLAN
192	□ Operators of the construction equipment and vehicles would be fully trained to reduce the chance of accidents.	Agree	See HEALTH AND SAFETY PLAN
193	□ Construction equipment would be inspected for malfunctions or faulty parts to reduce the risk of leaking fluids which could harm the environment or humans from contact.	Agree	See HEALTH AND SAFETY PLAN
194	□ Safety devices such as traveling grounds, guard structures, and radio equipped public safety roving vehicles and lineman would be in place prior to the initiation of wire stringing activities.	Agree	See HEALTH AND SAFETY PLAN
195	□ Guard poles or guard structures would be installed at all transportation, flood control, and utility crossings, and may be installed at parks or near residences. Guard poles are temporary facilities designed to stop the travel of the conductor should it momentarily drop below a conventional stringing height.	Agree	See HEALTH AND SAFETY PLAN
196	" Use of the immediate area in which construction would occur would be restricted for safety reasons (PPL and PSE&G 2008, A10-6) to minimize impacts on park visitors during construction of the line within the parks.	Agree	See HEALTH AND SAFETY PLAN
197	□ Construction areas would be fenced off in areas outside of the park, but inside the study area, where the public could access the construction site.	Agree	See C&R STANDARDS
198	□ A safety representative would be stationed at APPA crossings during any and all construction to maintain public safety.	Agree	See HEALTH AND SAFETY PLAN
199	□ A safety watchman would be on the river during stringing operations to stop any boat traffic if an incident does occur or if conditions otherwise warrant (PPL and PSE&G 2008, 6).	Agree	See C&R STANDARDS
200	□ Road closures and traffic control would be implemented to minimize the risk of accidents from occurring during the construction period.	Agree	See HEALTH AND SAFETY PLAN
201	" Helicopters would be regularly maintained and inspected and the operation would be performed by individuals certified/licensed in helicopter aviation.	Agree	See HEALTH AND SAFETY PLAN
202	" Operators conducting aerial work in support of the utility may encounter hazards from the various types of flight profiles, terrain, infrastructure, weather, and operation at low levels and speeds.	Agree	See HEALTH AND SAFETY PLAN
203	□ To reduce the potential risk of a collision, the crew would identify potential collision hazards and make corrective actions prior to taking flight.	Agree	See HEALTH AND SAFETY PLAN
204	□ While in flight, the crew would exercise concentration, maintain situational awareness, be knowledgeable of their area of operations, maintain effective communications, and establish clear roles and responsibilities.	Agree	See HEALTH AND SAFETY PLAN