FINAL
ENVIRONMENTAL IMPACT STATEMENT

for the

TRI-LAKES RELIABILITY PROJECT

February 17, 2006

123 Main Street
White Plains, New York 10601
914 681.6200

New York Power Authority

January 9, 2006

Mr. Mark Sengenberger
Deputy Director – Regulatory Programs
Adirondack Park Agency
P.O. Box 99
New York State Route 86
Ray Brook, NY 12977

Dear Mr. Sengenberger:

The New York Power Authority appreciates your Agency's timely and thorough review of its application for the Tri-Lakes Reliability Project. We received your Notice of Incomplete Permit Application dated December 15, 2005 and prepared responses to the additional information requested. Please find enclosed three copies of those responses. Please note that the three copies of the Environmental Work Plan Drawings and the three copies of the large scale project map are being shipped in separate packages but concurrently with this mailing.

We would greatly appreciate your timely review of this material. If you or your staff have any additional questions, please feel free to contact me at 914-287-3971 or Mr. Walt Bakowski at 617-457-8263.

Sincerely yours,

John J. Suloway
Executive Director
Licensing Division

cc: John Quinn
Walter Bakowski

TRI-LAKES RELIABILITY PROJECT
APA Project No. 2005-325
Responses to APA Comments dated 12/15/05
January 9, 2006

Comment 1:

The application describes two proposed routes for the transmission line: (I) a 26 mile long "preferred route" from a new substation in the Town of Parishville to the existing Piercefield substation and (ii) a 28 mile long "alternate route" from a new Newton Falls substation to the Piercefield substation. Please confirm that the project sponsor seeks final Agency review and approval only for the "preferred route".

Response 1:

NYPA confirms that it seeks agency review and approval only for the "preferred route".

Comment 2:

The application indicates that Mr. John Suloway is the project sponsor's Authorized Representative. However, Mr. Walter Bakowski has served as the person who routinely corresponds with the Agency and who has been contacted to discuss questions and during preapplication discussions. Please clarify which individual will act as Authorized Representative for the project.

Response 2:

Mr. John Suloway is the project sponsor's Authorized Representative. Mr. Bakowski and his firm (Tetra Tech EC, Inc.) have been contracted to support Mr. Suloway during the permitting of the project.

Comment 3:

Prior discussion between the project sponsor and agency staff have resulted in an unwritten understanding that Agency review of portions of the project pursuant to §814 of the Adirondack Park Agency Act will be extended from a 30-day review period to 90 days in order for it to run concurrently with the 90-day review clock for the Part 578 Wetlands and Part 577 Rivers permit jurisdiction portions of the project (see 9 NYCRR 572.1[a] and the APA Act Section 809(2) [c]. Please provide written confirmation of this understanding and agreement.

Response 3:

The Project Sponsor, New York Power Authority, waives the 30-day review requirement of Section 814 of the Adirondack Park Agency Act and agrees to extend the time to 90 days with the understanding that the APA has agreed to make its best efforts to review the various aspects of the Project within 60 days.

Comment 4:

The application includes an untitled list referred to in the application as an "abutters list" which includes property owners' names, addresses and Parcel IDs (tax map designations) and a series of maps for adjacent landowners with numbered parcels that do not correspond to the Parcel IDs shown on the list. Revise this list to also include a column containing parcel numbers as shown on the maps provided. Also, provide two sets of adhesive mailing labels and an electronic copy of these labels for these adjoining landowners.

Response 4:

The attached abutters list now has a title, "Application for State Agency Projects, General Information Request, Question #2., Abutters List." The abutters lots shown on the series of maps are each labeled with consecutive numbers 1, 2, 3, etc., which correspond to the first column (most left hand column) of the abutters list. The maps were labeled in this manner because of space constraints on the 11 x 17 format maps, and the large number of parcels to be labeled. In certain areas where parcels are small, using tax Parcel Ids would clutter the map and make it illegible. The list does not need to be revised as it already includes a column containing the numbers which are shown on the maps.

One set of mailing labels was provided to the Agency. Two additional sets of mailing labels are attached and an electronic version (Word format) will be provided.

Comment 5:

Provide a narrative summarizing the process whereby the project sponsor or National Grid will acquire easements for purposes of locating and constructing the "private-land portion" of the power line right-of-way, including a brief description of the procedure involved and references to the statutory authority for acquisition of rights-of-way by eminent domain.

Response 5:

The determination of what real property is needed for the proposed electric line occurs after an extensive and thorough engineering process that includes a series of planning and design phases and takes into consideration the environmental and physical characteristics of each property, together with the permit requirements for the project. Upon completion of the engineering process, a map is prepared which

shows in detail the extent of the right of way needed on each property. The owner of each property will be offered the fair market value for the rights needed for the project. The fair market value of the rights needed for each property will be based upon an examination and comparison of the features of the subject property with the prices at which similar properties are being sold in the current market. The fair market value amount offered to each landowner will be presented as a single, firm offer. If there are particular aspects of a property that a property owner requests be given further consideration in their affect on the value of the property, the owner will be asked to furnish this information to the project sponsor's representative listed below, together with any evidence supporting the information, and it will be considered. National Grid will take the lead in acquiring the property rights, so submissions or questions regarding compensation and acquisition will be made to Frank Sciortino, Real Estate Asset Management, 300 Erie Boulevard West, Syracuse, New York 13202.

Eminent domain will be utilized in the event that an owner is unwilling or unable to grant the real property rights needed for the project. To the extent that the Adirondack Park Agency proceedings cover the issues to be addressed in the public hearing required by Article 2 of the Eminent Domain Procedure Law, the project sponsor should be exempt from holding additional public hearings. The project sponsor will be required by Article 3 of the Eminent Domain Procedure Law to establish its highest approved appraisal amount for the real property rights to be acquired and will offer that amount to the owner. The project sponsor will then petition the court for a taking by eminent domain in accordance with Article 4 of the Eminent Domain Procedure Law and upon the filing of the acquisition map and an undertaking title to the real property rights needed would vest in the project sponsor.

Comment 6:

Provide a copy of the July 20, 1988 Public Service Commission "Special Plan Condition; PSC Case 27605" which is referenced in Appendix J of the draft environmental impact statement (DEIS).

Response 6:

A copy of the PSC order is attached.

Comment 7:

Provide a copy of the most recent report submitted to the Public Service Commission by Niagara Mohawk Power Corporation (National Grid) as required by Ordering Clause 3 of the July 20, 1988 Public Service Commission "Special Plan Condition" (PSC Case 27605) detailing the transmission right-of-way acreage within the Adirondack Park treated or maintained within the preceding year by each technique (using herbicides or not) for controlling undesirable

vegetation. (As referenced in DEIS Appendix J, "Appendix 8, Special Plan Conditions Which Apply within the Adirondack Park")

Response 7:

A copy of the report dated March 10, 2005 is attached.

Comment 8:

Please have enclosed Local Government Notice Forms filled out and signed by the municipal building inspector, zoning administrator or the planning board chairman for the Towns of Piercefield and Parishville and return them with the rest of the requested information. If these towns do not have a building inspector, zoning administrator or the planning board, then have the form filled out and signed by the town supervisors.

Response 8:

Copies of the signed Local Government Notice Forms from Piercefield and Parishville are attached.

Comment 9:

A Memorandum of Understanding exists between the Agency and the New York State Department of Environmental Conservation (DEC) to provide coordinated reviews of project subject to review jurisdiction by both state agencies. In order to facilitate a coordinated review, please confirm that all necessary application(s) and supporting information have been submitted to DEC and document that DEC has determined the application(s) complete. Provide complete copies of all application materials that have been submitted to and determined complete by DEC. You do not have to duplicate materials already submitted to the Agency, other than identify which materials have been provided to DEC as part of any applications.

Response 9:

DEC Region 6 received a copy of the APA application packet and DEIS which includes the Joint Permit for Application, and the Notice of Intent for construction activities. An application package was also submitted to DOT Region 7 which included the DOT Highway Work Permit Application for Utility Work. A letter dated December 29, 2005 was submitted to the NYSDEC Region 6 Director, Sandy LeBarron, which includes the permit application and additional site location maps to aid in their review. A copy of the letter is attached.

In response to NYPA's December 29, 2005 letter, NYSDEC responded by email and indicated that " The application appears complete in that all the necessary drawings, application forms and other exhibits are submitted, however we cannot declare the application complete until NYPA as lead agency completes the SEQR

process. Please keep us informed on this matter so that we can process this application once SEQR is completed." A copy of the email is attached.

Comment 10:

Both the application and DEIS indicate that the project may involve cultural resources which are listed or eligible to be listed on the State or National Registers of Historic Places. Because of this, please consult with the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) and provide that Office's recommendations for additional studies or surveys to be done and, based upon these studies, either documentation from OPRHP that the project will not have an impact on "any historic, architectural, or cultural property" pursuant to section 14.09 of the Historic Preservation Act of 1980, or its direction for mitigation of any impacts to these resources. Provide copies of all correspondence between the project sponsor and the OPRHP, studies or surveys submitted to OPRHP, and meeting notes, including the notes from the August 22, 2005 meeting.

Response 10:

Mr. William Slade and Mr. Robert Panepinto (New York Power Authority), accompanied by Dr. Sydne Marshall (Tetra Tech EC, Inc.), met with Ms. Cynthia Blakemore (OPRHP Staff Archaeologist) and Ms. Lynn Garofalini (OPRHP Staff Architectural Historian) on August 22, 2005 to discuss the Tri-Lakes Reliability Project (meeting minutes are attached herein). The purpose of the meeting was to introduce OPRHP staff to the Project and to discuss approaches proposed to cultural resources studies, both archeological and architectural, that would be performed during the permitting process for the Project.

Discussions established that architectural inventory would be performed in areas that have been assessed to have potential views of the Project, (i.e. viewshed with tree cover), not in an arbitrary five-mile radius around the entire project. It was recognized that the potential project impacts to the NHL-listed State Forest Preserve would be of concern. On December 20, 2005, the Authority provided a report on the architectural historical inventory performed for the Project to OPRHP.

Prior to the meeting with OPRHP (August 22, 2005), the Authority provided OPRHP with a Phase 1A cultural resources report developed for the Project. During the August meeting the Authority discussed the results of its initial walkover survey of the Project and made some recommendations for Phase 1B investigations. The Authority proposed to perform follow-up subsurface survey along areas of the finalized Project Route rather than along all of the alternatives under consideration during route selection phases of the Project. OPRHP staff concurred with this approach. On December 20, 2005, the Authority provided an addendum to the Phase 1A report.

Following receipt of comments from OPRHP staff on these reports, the Authority will provide all correspondence to the APA. The Authority will continue to consult with the OPRHP and the APA until the entire cultural resources process has been satisfied. The Authority will perform follow up Phase 1B studies where necessary. If potentially significant archeological sites are discovered that may be affected by the Project, the Authority will first attempt to modify the Project in a way that may avoid Project effects. If this proves to not be possible, the Authority will perform Phase II investigations and if necessary, subsequent Phase III studies prior to implementation of the proposed Project.

Comment 11:

The project will be located largely in areas designated Rural Use and Resource Management by the Adirondack Park Land Use and Development Plan Map. Among the basic purposes and objectives for these land use areas as contained in §805 of the Adirondack Park Agency Act is the need to protect and preserve open space. While the DEIS explains the project sponsor's position with respect to open space impacts for portions of the transmission line along public highways, it does not describe how the project is intended to be consistent with open space protection and preservation (for those portions of it that will not be located adjacent to public roads such as the offsets or the substations). Please describe how the project design will be consistent with open space protection and preservation in these undeveloped areas.

Response 11:

Discussion of open space was included in the DEIS Section 1.1.4.3 "Preferred and Alternate Route Identifications and Evaluation". In addition to that discussion, the following must also be included.

In order for a project to have an open space impact, the change in the environment must be perceivable and at a level of impact that is readily apparent to the public. Commitment of the land to a wider utility corridor or to a new utility corridor does not change the open space characteristics of the area. Open space, or the image of open space, is a development pattern that preserves greenspace to an extent that the undeveloped landscape is the dominant portion of the setting. Open space can range from untouched forest to an agricultural setting that includes necessary agriculturally related buildings or facilities. The transition from developed lands to undeveloped properties is an important component of open space, as these areas show the changes in the environmental conditions. The development of a wider ROW that involves pushing the wood line back from the roadway does not change the transition from developed to undeveloped land. The new wood line edge will remain a definitive beginning of the undeveloped land and will not alter the overall context of the mixed forest tree species.

The ROW as it enters a forested setting will be detected by the public as a brief interruption in the forest. The ROW can only be seen briefly from the ground level

and does not transverse slopes or hillsides that allow viewing of the ROW for a long distance which reduces the visibility. Low visibility causes the changes in open space character to be correspondingly small. The natural vegetation outside of the 75 foot ROW is the only natural screening that can occur without jeopardizing the reliability of the transmission line. The poles proposed to be used are single wood poles which will for all intents and purposes blend in with the natural environment.

According to the Adirondack Park Agency's "Development in the Adirondack Park, Objectives and Guidelines for Planning and Review", (1977, updated 1991), Section I, "Resources – Open Space" A.9., "proposed roads and utility corridors should follow existing topographic contours and avoid perpendicular crossings of contour lines". In general, where the proposed transmission ROW will be built as an offset, the route doesn't run perpendicular to existing topographic contours. In this way, the proposed project is in compliance with the APA's Development Guidelines.

Offset locations will not be visible from the ground, except for the potential visibility where they enter a forested location. Generally, an offset utility ROW would only have any substantial potential visibility from the air.

Although a new cut is being made through the forest, visibility of the proposed corridor is reduced by the existing topography and vegetation. This is supported by the results of LA Group visual surveys from nearby high points and fire towers that were thought to have potential visibility of the proposed corridor location. The result of that fieldwork was the conclusion that existing topography and dense vegetation blocks any potential views of the proposed line and ROW. From a regional vista perspective, the proposed transmission ROW will not change the vista and will not change the open space character of the region.

Comment 12:

The project is proposed to include wooded buffers between public roads and those portions of the transmission line that are part of Offset ROW Sections and between the two proposed substations and public roads and, in the case of the Piercefield substation, the Raquette River. Since maintaining the integrity of undisturbed vegetative buffers will be critical to minimizing project visibility, explain how these buffers will be maintained and protected during both construction and operation.

Response 12:

Transmission line offsets and maintenance of wooded buffers are a major component of the Newton Falls alternative but form only a minor part of the Preferred Route. Much of the Preferred Route occurs adjacent to the travel corridor, and is a pole for pole replacement of the existing utility.

The significant protective function of the APA Critical Environmental Area along the state travel corridors should not be under estimated. Some or all of the offset areas exist in the CEA and are identified below:

Offset P2	**Most of the offset is in the CEA**
Offset P11	**This is an overbuild in the Piercefield Hamlet.**
Offset P10-P11	**Cross-country offset screened by topography and some of the offset is in the CEA**
Offset S1.5	**Large offset that is perpendicular to major roads, therefore, it has very minimal visibility**
Offset S13	**Most of the offset is protected by the CEA**
Offset S14	**Large offset that avoids camps and homes in the area. This offset is nearly perpendicular to the travel corridors which limits visibility.**

While use of vegetative buffers is a benefit, it falls far short of being "critical to minimizing project visibility" in the above areas, since more of the visual setting includes existing utilities. The project applicant does not have the capacity to control, maintain, preserve, or enhance these off ROW buffers post construction since the lands utilized by the applicant will be occupied as an easement. Project applicant is not proposing to take scenic easements over adjacent buffer lands not taken for construction and maintenance of the project. In many cases, the visual separation and screening is amply provided by intervening landforms as identified in the above chart for segments at P10-P11, S1.5, and S14.

Comment 13:

Buffers of only 25 to 30 feet in width between substations and public roads may provide inadequate visual screening, as is evidenced in the photo simulations. Assess the feasibility of employing more substantial buffers (such as wider buffers or planting evergreen trees in the buffers) that would provide for increased visual screening.

Response 13:

Attached please find revised substation landscaping plans which provide additional in-fill evergreen plantings. The nature of the substation is such that screening under the transmission wires is impractical, because there can be no plantings within the wire security or priority zone. At a substation, wires must enter and leave, creating two locations at each substation that cannot have screening. New security concerns eliminate the ability to construct berms at the front of the substation, and turning movements of large trucks limit the space for berms. The Stark Falls substation must be located adjacent to the existing 115 kV line. The substation has been sited to be placed on a natural shelf, just before the topography falls away from the road.

The 30 ft. undisturbed buffer is a balance between minimizing impacts to woodlands and steep slopes and maintaining the maximum practicable undisturbed buffer.

The Stark Falls substation is proposed for a location that is not heavily traveled. Visibility and visual impact assessment must consider the number of potential viewers (there are few), and receptor activity during view opportunity (driving by).

Comment 14:

Describe replacement pole locations in relation to existing poles in terms of the typical separation distance and the maximum separation distance.

Response 14:

In those areas where National Grid performs a pole for pole replacement, the replacement pole will be placed within a distance of 6 feet (on average) away from the existing pole when there are three over-head conductors involved. This distance is based upon working clearances necessary for line crews to place the new pole between overhead conductors and to allow for making the distribution line transfers. Where a single overhead conductor is involved, line crews will attempt to cut this distance down as much as possible, with the ideal situation being trying to place the new pole along side of the existing pole. In either case we do not anticipate a replacement pole being set further than 10 feet away from the existing pole.

Please note that where poles currently are located in wetlands, National Grid will make all efforts to avoid the wetland condition. Subsequently, we cannot predict where the pole will be placed in these circumstances at this time. Our final design will address these conditions along with any other specific conditions where a direct pole for pole replacement cannot be done.

Comment 15:

Application of herbicides not only within wetlands but also within 100 feet of wetlands constitutes a "regulated activity" subject to Agency review jurisdiction. Clarify whether herbicides will be used within 100 feet of wetlands both during construction and afterwards and, if their use will be required as part of a permit application including the specific chemicals to be used, amounts, application methods and rates, etc.

Response 15:

The information regarding herbicide use and setbacks was provided in the APA application for State Agency Projects for Construction of Roads/Trails Involving Wetlands, Supplemental Information Request, question #17.

Herbicides will not be applied within wetlands during the construction of this project. A wetland will be defined as that which has been delineated plus a 100 foot buffer area around the delineation. This buffer will be applied to all wetlands within the proposed project's ROW regardless of their jurisdictional status (APA or ACOE regulated wetland). National Grid reserves the right to apply for permits to utilize herbicides for maintenance in future years.

Vegetation maintenance will be in accordance with PSC Part 84 requirements and related Cases. The following information regarding herbicide application is in addition to what has been previously submitted to the Agency.

"To assess the potential use of herbicide for stump treatment, the records of NMPC in the Transmission Right-of-Way Management Program, November 2003, were reviewed.

In 2003, 0.26 gallons per acre of herbicide products were utilized for stump treatment on 1,807 acres of ROW statewide. The label for Accord XRT (53.6% glyphosate) recommends that up to a rate of 3 to 7.5 pints per acre for most tree species and up to 10.6 quarts per acre per year as the maximum treatment level. The 3 pints per acre is equivalent to 0.37 gallons per acre.

To estimate the amount of Accord to be used for the Preferred ROW, the rate of 0.37 gallons per acre will be utilized, but it could be higher depending on the density of trees in the ROW. No herbicide use will occur in wetlands, within 100 feet of a wetland, or in stream corridors. The total Preferred Route acreage to be cleared is 119.4 acres. To account for wetlands and wetland adjacent areas (100 foot buffer), streams, and stream buffers, it is assumed that only 72 acres of the Preferred ROW will have chemical stump treatment. The amount of work solution required will be between 18.7 and 26.6 gallons which converts to 10.0 to 14.3 gallons of active ingredients."

Other products that are labeled for stump and basal treatment may be used to meet the objectives of the National Grid integrated vegetation management program, the strategy of which avoids over use of a single product or prescription.

Comment 16:

On Page 6 of the General Information Request, it states that the amount of wetland acreage to be lost will be determined during the preparation of detailed construction plans, but it also seems to indicate that 0.1836 acre would be lost along the Preferred Route and 0.3213 would be lost along the Alternate Route. Also, Page 11 of the Supplemental Information Request states 0.1836 acre of wetland will be filled. However, Table 2-4 which is also referenced indicates "None on the Preferred Route" under Wetland Fill Impacts. Please clarify this apparent discrepancy and, for the route selected for Agency review, verify the amount of wetland to be filled and the location of the fill(s).

Response 16:

This inconsistency was corrected in the public distribution copies of the application materials. The final estimate of the fills for the Preferred Route is 0.18 acres. The locations of fills are shown by figures illustrating Impact Areas A-E in the General Information Request.

Comment 17:

The application states that a 1:1 wetland mitigation ratio will be used. Explain how this ratio was determined in light of the Agency's "Compensatory Wetland Mitigation Guidelines" which suggest a 1.5:1 ratio when "in-kind" compensatory mitigation occurs within the same subcatchment, and the ratios increase when "out-of-kind" mitigation occurs or when it occurs in the major watershed.

Response 17:

The attached submission in response to Comment 19 provides more than 1:1 mitigation for the anticipated project impacts in-kind replacement within the major watershed.

Comment 18:

Application material indicates that the compensatory wetland mitigation site will be transferred to a "conservancy" group. Identify who this group will be and describe the status of discussions with this group regarding the transfer.

Response 18:

Refinement of our proposed mitigation plan indicates that the creation area site shall be retained by National Grid.

Comment 19:

The description of wetland mitigation approaches which were provided serve for a conceptual review, but lack sufficient detail for review as part of permitting. Select the specific compensatory mitigation site(s) that will meet the ratio needs and provide a detailed compensatory mitigation plan that includes, but is not limited to, a statement of goals, reference wetlands, grading, planting and seeding plans, invasive species prevention methods, permanent and temporary erosion control plans, contingency plans and triggers, and monitoring protocols and schedule. Please consult the Agency's "Compensatory Wetland Mitigation Guidelines" for guidance and information in this regard. You are also encouraged to continue discussions with Agency staff regarding the contents and details for this plan. To assist you in the preparation of

a detailed compensatory mitigation plan, the Agency offers the following comments on two of the mitigation approaches which were provided:

- Mitigation Approach B does not appear appropriate, since Agency staff is aware of no impact to or destabilization of the river shoreline at the Natural History Museum of the Adirondacks site outside of the observation decks.

- Mitigation Approach C appears to involve an existing wetland crossing that is to be part of the work trail. The proposed detour route would take the work trail around the northerly end of the wetland. Would it be possible to locate both the work trail *and* the new transmission line to the north of the wetland? This would allow for restoration of that portion of Sevey's Bog, keep the transmission line in a totally upland position, and avoid all wetland impacts associated with clearing.

Response 19:

Attached please find a revised mitigation plan. This plan is an expansion of Tupper Lake Substation Plan (Mitigation Approach A). Mitigation Approach B has been dropped. Mitigation Approach C to remove the roadfill on the north side of Sevey Bog will continue to be investigated by the applicant. An earlier evaluation of possible routes on the south side of Raquette Boreal Forest showed that it would be difficult to fit the right-of-way (ROW) between the Forest Preserve lands wetland area to the south and private cabins to the north. The applicant will further explore routing opportunities for both the road and the ROW at the south side of the Raquette Boreal Forest. Removing the roadfills from the wetland is the most likely mitigation option since it would allow for improved wetland hydrology with minimal impingement on adjacent property owners. The transmission line would span the wetlands with poles placed outside the wetland boundaries adjacent to the newly constructed road. This arrangement would allow reliable access for maintenance. The restored area would recover as conifer wetlands, which are generally compatible with operation of the utility ROW.

Comment 20:

Control of existing invasive species populations along and adjacent to the transmission line route and prevention of colonization through construction equipment sanitation is an important aspect of this project. Eradication is a difficult task, but it seems that over the three growing seasons that this project will span, it should be possible to eradicate the Japanese knotweed (Fallopia japonica var. japonica) and the common reed (Phragmites australis). Eradication of these invasive populations should be part of the proposal regardless of the applicability as part of a compensatory wetland mitigation plan since project activities have the potential for spreading these species during the ordinary course of work. While the details provided regarding best management practices to eradicate these species are satisfactory, a commitment to invasive species control along the rights-of-way after the project is completed and operational is also sought. Further, since existing populations now extend beyond the rights-of-way and since

project activities within the rights-of-way have the potential to spread invasive species to adjacent areas extending beyond the rights-of-way, describe how invasive species populations that now exist or may spread in areas adjacent to the rights-of-way are to be eradicated.

Response 20:

NYPA and National Grid ("the applicants") acknowledge that eradication is a difficult task, and herein states that eradication of Japanese knotweed and common reed should be part of the project proposal regardless of nexus to compensatory wetland mitigation. The applicants are well aware of the difficulties in addressing the pervasive, invasive species issue; even limiting discussion to these two species is daunting. However, NYPA and National Grid are concerned about commitments to 1) "successful eradication for the duration of project construction" and 2) invasive species control along the rights-of-way after the project is completed and operational.

The applicants will commit to requiring that off-road construction equipment assigned to the project be pressure washed before entering the Adirondack Park. This exceptional measure should reduce the likelihood of introduction of invasive species during construction from vehicles used for construction.

The applicants will commit to treating upland stands of these *two* species within the right-of-way as they may be detected during the vegetation clearing and conversion phases of the right-of-way.

National Grid commits after construction to amending its list of undesirable species for this ROW to include these two species, and will target them during routine, cyclic vegetation management treatments of upland areas. While true that the construction project may extend over three seasons, the vegetation work will probably be limited to but one. Herbicides will be used on target trees and reed/knotweed as the clearing crew passes through. If there is an established upland patch of weed, it will not be excavated and hauled off site. It will be sprayed once. However, a year or two later during the conversion cycle, the entire right-of-way will be inventoried for retreatment to remove resprouts or 'missed' undesirable or capable species. Then the right-of-way will enter the routine program for inventory and treatment, probably on a five-year cycle. Thus National Grid is committing to controlling these invasive species, as permitted, on this ROW as part of its routine program which represents a significant environmental benefit.

National Grid's commitment is to treat stands of invasive species in accordance with procedures established by NYSDOT and found in the Tri-Lakes Reliability Project APA application for State Projects for Construction of Roads/Trails Involving Wetlands, Question #25c, Proposed Mitigation Measures. To facilitate APA's review, an excerpt from the Attachment to Question 25c is attached. National Grid

cannot commit to invasive species control in wetlands that is not specifically authorized by permit.

National Grid cannot commit to eradicate these invasive species in areas that are outside of its control. It will take an easement for the 'floor' of the right-of-way, with definitive danger tree rights beyond the limits of the floor, and off-right-of-way access agreements, but it cannot commit to illegally trespass to pursue treatment of a reed or knotweed growing beyond the limits of the right-of-way. Indeed, such prohibition is specifically stated in the standard language of NYSDEC permits issued outside the Park.

However, National Grid will commit to provide information to APA, TNC and any other entity based on its expertise and knowledge (studies, consultation, reports, other 'technical transfer') on the control of invasive species.

Comment 21:

Provide a scaled map occupying an entire plan size sheet and jpg image of it depicting the one entire transmission line route and two substations selected for Agency review in relation to labeled roads, water bodies, settlements, municipal boundaries and Adirondack Park Land Use and Development Plan Map land classification boundaries.

Response 21:

A copy of the map and a CD with the jpg image of it are included. The CD is in this response package and three copies of map are included in a separate package that was mailed concurrently.

Comment 22:

Sets of Environmental Work Plan (EWP) Drawings were received on November 30 and on December 5 and they depict variations to the project on at least Sheet 10 (Agency staff has not fully compared all plan sheets to determine whether there are other inconsistencies). Also, two sets of three sheets each of EWP Details were received on December 8. It is unknown whether these detail sheets differ from those previously provided on November 30 and December 5. In order to eliminate confusion caused by these submissions and to include needed revisions, provide 3 complete sets of final Environmental Work Plan (EWP) Drawings and jpg images of these drawings which have been revised (note revision dates and description of revisions on plan sheets) to include:

a. depiction of the one route being for proposed for agency review,
b. labeling of all named pubic roads, water bodies and other named features,
c. the river area boundaries for all rivers designated as scenic and recreational in the New York State Wild, Scenic an Recreational Rivers System,

d. field delineated wetland boundaries within 100 feet of all Off ROW Work Trail Locations or other locations where any regulated activity or new land use or development is being proposed.

This will be important for staff presentation of the project to the Agency Board.

Response 22:

A. We will make available for the Agency's future use for presentations a map depicting only the Preferred Route. At this time, we will not change the DEIS, EWP, or APA applications to reflect only the Preferred Route.
B. Labeling has been added to the EWP sheets
C. The river area boundaries have been added to the EWP sheets and are depicted as a stipple pattern.
D. There are no field delineated wetlands within 100 feet of the off-ROW work trails on the Preferred Route.

Comment 23:

In addition to more detailed plans provided for activities in and adjacent to wetlands on the Alt1 through Alt6 route, provide final detailed plans drawn to a scale of 1 inch equals 50 feet for all other locations where activities such as pole placements and work trail construction are to occur in or within 50 feet of wetlands, stream crossings, and other critical resource areas. These plans and revisions to the previously provided plans must also depict pole placement locations in relation to field delineated wetlands, and stormwater controls and all temporary and permanent erosion control measures for all areas where soil disturbance is to occur within 50 feet of wetlands and/or streams. Include these plans and jpg images of them as part of the EWP Drawing sets.

Response 23:

A PowerPoint compatible image set will be made available to the Agency for their use in future presentation to the Commissioners or staff.

A typical detail covering the construction procedure in or near wetlands has been prepared and has been made part of the EWP Detail Sheets. Detailed drawings of the wetland fill locations on the Preferred Route have also been included as part of the EWP Detail Sheets.

Comment 24:

Will the "terra-cell" cellular confinement system provide sufficient cross drainage at all locations where it will be employed? Will culverts also need to be installed at these locations? If so, provide typical culvert details including sizing criteria.

Response 24:

The "Terra-cell" system will allow substantial cross drainage in the stonefill on top of the "Terra-cells". The geofabric base and open grid design will be supplemented by the addition of 12-inch culverts spaced at 25 foot intervals along the wetland crossings, with additional culverts provided as necessary, as determined by Public Service Commission sizing criteria which is based on watershed size. The following table was created from Tables 2 and 3 from the Public Service Commissioner's "Guides to Filing a Gas Facility Application Under Article VII of the Public Service Law," Section "Construction Utility Access Roads." During high flows the entire roadway will be submerged to pass these flows.

Culvert Sizing for Alt2-3 Wetland Crossing

Drainage Area Acreage	Crossing	SF (From Table 2)	Culvert Diameter (From Table 3)	12" Culvert
27	A	1.2	<18"	(2)
27	B	1.2	<18"	(2)
45	C	2.1	18"	(3)
37	D	1.9	18"	(3)
22	E	0.08	<18"	(1)