

Comment Summary	Comment Details	VHB Response	Revisions to Individual Vermont Wetland Permit Application
VT DEC Comments from June 27th Individual Wetland Permit Application Letter #2013-280			
Potential errors on Impact Exhibits (IE); Natural Resource Map Series (NRMS); Functional Forms; Natural Resources Report (NRR)	IE #'s: 6 (out of order), 114 (HDD symbol wrong), 115 (move wetland labe is entire wetland only 37 square feet), 121 (stream that disconnected from culvert?)	Impact Exhibit sheet order has been corrected; HDD symbology was not displaying correctly - has been corrected; Wetland label on sh 115 has been moved and additional wetland buffer added to a missing approximate feature; stream-culvert disconnect on sh 121 was corrected	Application includes updated Impact Exhibits in Attachment 3
	NRMS #'s: 43 (add T-MH-AW11 label)	Label has been added	Application includes updated Natural Resource Maps in Attachment 2 which includes an updated label to T-MH-AW11
	T-MH-W24 Functional Form missing	Looks like this is included in the zipfile of functional forms we can include this one again- labeled as 75-T-MH-W24	Wetland functional form 75-T-MH-W24 included in Attachment 4
	NRR says pink flagging used?	Pink flagging was used in the railroad portion of the project but not along the roadway corridor; Error in description of the flagging in the Natural Resources Report	No update to the Natural Resources Report text in Attachment 5
Wetland classification, function, and descriptions changes (recommendations)	CN-W-16 (permitted as Class II) should be Class III	This is contiguous with a mapped VSWI; to be consistent with Project mapping, wetland CN-W-16 left as Class II	No change in Natural Resources Mapping
	<i>Typha latifolia</i> in wetland buffers; T-CL-W15, 22; T-MH-W41, 55?	Will update- should be included in wetland but not buffers; VHB field reviewed buffer vegetation throughout the alignment on 7/24/15 to update Table 2	Application includes updated summary Table 2- Section 6 and 14; Column 8.6.2 for wetlands T-CL-W15, T-CL-W22, T-MH-W41 and T-MH-W55 and others where dominant hydrophytes were previously listed
	T-MH-W73 associated w/ stream, and could be providing erosion protection	Assume this comment means T-MH-AW-73 (Class II) - lacking defined stream channel from arials- not identified in field/ ground truthing during field surveys- does not change the classification; review on 7/23/15 field visit; no stream observed from within direct Study Area	No change in functional analysis
	T-MH-W37 (IE 111) (MP 140.6- 140.7) currently Class III, but is contiguous with larger complex, may be Class II	T-MH-W37 is classified as Class II; T-MH-AW-37 was classified as Class III will be updated to Class II and shown on NR map series/impact exhibits accordingly	Application includes updated Impact Exhibit in Attachment 3 and the Natural Resource Maps in Attachment 2 to reflect the change in T-MH-AW-37 wetland classification
	T-MH-AW38N (Class II) (IE 109) shown small and isolated, but considered functionally significant due to contiguity, reconsider	There is not a feature named T-MH-AW-38N. T-MH-AW-38 drains under road to larger feature classified as Class II	No change in mapping
	T-MH-AW70 (MP 141.7) entirely delineated? Reconsider class	This wetland appears to be contiguous to a Class II wetland; VHB changed wetland classification to Class II	Application includes updated Impact Exhibits in Attachment 3 and the Natural Resource Maps in Attachment 2 to reflect the change in T-MH-AW70 wetland classification; Changes also reflected in Table 1 and Table 2 and Functional Evaluation Forms
	T-MH-AW65/66 (IE 121) doesn't provide erosion control or fish habitat?	This stream (T-MH-AS42) is approximated as intermittent will add suitable erosion control; stream not large enough to support fish habitat; doesn't change classification	Application includes updated functional form and functional criteria in table 2; no change in wetland classification
	Functional forms for V-FH-W9, T-CL-W17, 18, 22 have wildlife functions checked, but not first box indicating function is present	Reviewed functional analysis and updated V-FH-W9, T-CL-W17, 18, 22 to include wildlife habitat; doesn't change classification	Application includes updated functional form and functional criteria in table 2; no change in wetland classification
	T-MH-AW69, TMH-W69 South Functional sheets show no justification for presence of wildlife habitat function	Review functional sheets; no change to classification	Application includes updated functional form; no change in wetland classification
T-MH-W23 shows wildlife habitat in application table 2 but not in functional form; functional form indicates VP amphibians supported but not in rest of application	Field notes identify that aquatics are observed in the field; no vernal pools were identified in the field survey	No change in feature; amphibians identified in wetland, doesn't meet other vernal pool criteria	
Describe where railroad ties will be disposed of for Project section in Shrewsbury	Describe how ties will not be placed in Class II wetlands or buffers; will disposal details be included on construction sheets; address in avoidance section	Include as note or revision to EPSC plan sheet details; Update VWP Form Section 12.4.1 to address removal of railroad ties proximal to wetlands and buffers	EPSC plans included in Attachment 2 has a note to indicate ties not placed in wetland or buffer but left in railroad right-of-way- updated in Section 12.4.1
Application Section 12.1 refers to EPSC & ICSDP descriptions of seed application and temp. soils stabilization	Add INDC application material in VWP Attachment 2; also include example EPSC plan sheet which signifies areas to use natural fiber erosion controls (wood chip berms or coir rolls specified?)	Add INDC EPSC plans to EPSC Plans and include in VWP; highlight/ reference in 12.1 example EPSC plan sheet(s) which indicates areas to use natural fiber erosion control	Application includes EPSC plans included in Attachment 2 and referenced in Section 12.1
Quantify additional area of vegetation management in wetland and/ or buffers beyond regular road maintenance	Quantify veg management in (assuming) Class II wetlands and buffers outside of regular road maintenance; update VWP Form Section 12.3	The only vegetation management in Class II wetlands and buffers, outside of regular road maintenance, is included in the areas that are not established as Clear Zones, and the emergent wetland located in Alburgh will clarify in Section 12.3	Application Form includes update to Section 12.3 for submittal
Add additional site visit date to VWP Application Form Section 5	Additional site visit, section 5	Include 5/28/15 site visit with ANR	Application Form is updated to include 5/28/15 meeting
Explain time of year of VP surveys; discuss use of natural fiber erosion controls to VWP Application Form Section 19	Add time of year of VP surveys to form Section 19; discuss natural fiber erosion controls (geotextile fabric or coir rolls)	Update VWP Form Section 19 to include VP survey dates and describe erosion controls as necessary as relates to amphibians;	Application form is updated to include VP survey dates in Section 19 and includes EPSC plans in Attachment 2
Section 20.2 - Table 2 indicates 5 wetlands function as Natural Communities but only 2 areas are mentioned	Add additional natural communities to Table 2 (Section 20.2)	Wetland V-BE-102 is no longer impacted; wetland feature V-WH-W-6 is contiguous to mapped VSWI and mapped natural community; the community was not evaluated as it is far outside of the Project Study Area; still included in complex mapping and addressed in Section 20.2	Application includes updated Table 2 for VWP application form Section 20.2
Include an example of EPSC restoration and revegetation measures	Included in INDC application	Include complete EPSC Plan in Attachment 2 of the application	Application now includes EPSC plans in Attachment 2
Permit conditions will include NNIS monitoring and control conditions; suggest adding summary of wetlands subject to covertime conversion (including acreage) and presence of NNIS in wetland/ buffer	List and quantify Class II wetlands subject to covertime conversion for NNIS monitoring and control permit conditions; DEC needs to know which wetlands will be maintained by TDI which are not in the existing "clear zone"	Revise VWP Application Form Section 12.3 with requested information regarding NNIS and wetland conversion	Application form is revised and includes NNIS data and wetland conversion table
Regarding the standard condition on recording VVPs in land records for affected properties	Since most of the overland project is within existing ROW, suggest alternative way to memorialize wetland constraints	Recommend alternative method to memorialize wetland constraints in land records; coordinate with Wetlands Section	Proposed alternative still to be determined by Applicant- In progress
Unmapped, presumptive Class II wetlands should be added to VSWI	Provide (at minimum) shapefiles of all wetlands which would be impacted by the project and meet at least one of the VWR Section 4.6 presumptions	Provide shapefile to DEC which includes (at minimum) all proposed Class II wetlands which would be impacted by the Project	An email from VHB will follow that provides shapefiles for all delineated wetlands (Class II and III) within the Road ROWs
Provide updated plans regarding alignment shifts which occurred as part of other permitting processes	Provide updated/ revised Project plans (impact exhibits, analysis) for areas where project has changed	Provide updated/ revised Project Plans (replace general plans in app with current plans including full EPSC plan); revise Impact Exhibits/ Analysis)	Application includes EPSC plans in Attachment 2 of the Application
Send complete updated digital application form and materials (including signature page) due to change in representative. Relevant materials may be provided in paper copy and mailed.	--	Update/ revise materials as indicated; electronically compile complete VWP application package; submit materials (hard vs. electronic copies) consistent with original submittal	Complete revised materials are sent via CD-ROM
NECPL Design and Wetland Classification Change			
Modify Stream Crossing Type from Over Culvert to HDD on VT-22A for Unnamed Tributary to the Hubbardton River (V-BE-S-102)	NR Sheet 6; MP 103.1	VHB will revise materials to account for stream crossing type over the Hubbardton River; this design revision removes impacts to wetland V-BE-W-102	Application has been revised to include removal of V-BE-W-102 in impact exhibits and spreadsheet in Attachment 3
Extend HDD along US Route 4; Otter Creek Crossing (T-RU-S2) due to concerns with River Corridor management	NR Sheet 27; MP 126.4 to 126.9	VHB will revise materials to account for change in HDD along Route 4 and remove impacts to T-RU-W3 and additional impacts to T-RU-W4	Application has been revised to include the removal of impacts to T-RU-W3 and updated wetland and buffer impacts to T-RU-W4, in impact exhibits in Attachment 3
Wetland classification changes along Vermont Railway; Wetland T-WA-W3/T-WA-AW3 and proposed buffer	NR Sheet 36 & 37; MP 137 to 137.2	VHB will revise materials to account for stream crossing type over the Hubbardton River; this design revision changes impacts to wetland	Application has been revised to include Wetland T-WA-W3/T-WA-AW3 on impact exhibits in Attachment 3, Natural Resource Maps in Attachment 2, and Tables 1 and 2

Note: Gray Highlighted cells indicate change or update in the Revised Individual Wetland Permit Application dated August 4, 2015