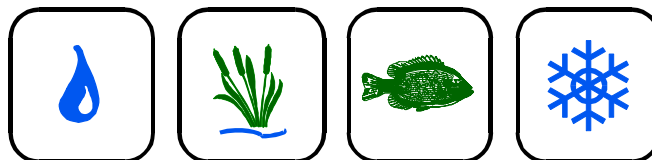


**VT TRANSCO, LLC.
EAST AVENUE LOOP (EAL) PROJECT
Chittenden County, Vermont**

SUPPLEMENTAL REPORT

**WATER RESOURCES AND RARE, THREATENED, AND ENDANGERED
(RTE) PLANT AND NATURAL COMMUNITY REPORT FOR
PROPOSED RIGHT-OF-WAY ACCESS ROUTES**

July 6, 2007



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FOR

PROPOSED OFF-RIGHT-OF-WAY ACCESS ROUTES

Prepared by

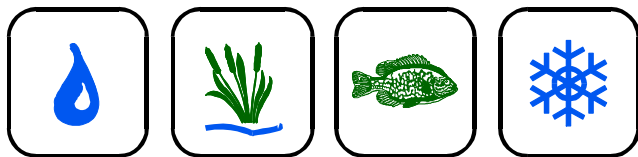
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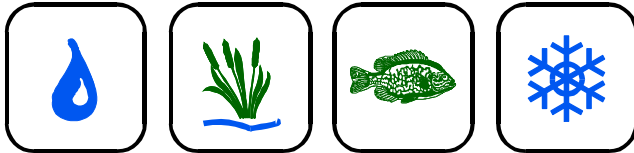
FOR

PROPOSED OFF-RIGHT-OF-WAY ACCESS ROUTES

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PROPOSED OFF-RIGHT-OF-WAY ACCESS ROUTES

1.0 INTRODUCTION

On behalf of VT Transco, LLC (VT Transco), Pioneer Environmental Associates, LLC (Pioneer) conducted a wetland and stream survey along all proposed off-right-of-way (off-ROW) access routes and two proposed right-of-way (ROW) realignments, identified at this time, to support VT Transco's East Avenue Loop (EAL) Project (Project). As part of the due diligence effort to evaluate natural resource constraints within the EAL project area, this 2007 natural resources survey was conducted to supplement the natural resources survey conducted by Pioneer within the proposed EAL ROW in 2006 (Pioneer, 2007). Pioneer also conducted a Rare, Threatened, and Endangered (RTE) plant and natural community survey along the proposed off-ROW access routes, and a

supplementary springtime RTE survey within the existing and proposed EAL ROW. The additional RTE survey was conducted to supplement findings of the 2006 report, since certain species could be more easily identified and verified early in the growing season in Chittenden County, Vermont. This report outlines the methodologies and findings for the wetland and stream survey, and RTE plant surveys. The methodologies utilized for these surveys are consistent with those employed for the prior on-ROW surveys completed by Pioneer.

The Project is a comprehensive electrical transmission infrastructure project intended to improve the reliability and quality of electric power delivery throughout Chittenden County (see Site Location Map on page 1 of Appendix 1). The proposed upgrade to infrastructure is intended to increase electric system stability in the greater Burlington area (VELCO, 2005).

The Project will include the following:

- The installation of a 34.5 kV sub-transmission line which will extend from the substation adjacent to the McNeil Generating Station, located at the Intervale, to the VT Transco substation at East Avenue, near Centennial Field in Burlington;
- The installation of two, co-located single-pole 115 kV transmission lines between the Essex substation and the East Avenue substation almost entirely within an existing power line ROW, thereby replacing the existing H-framed 115 kV transmission line and creating a double circuit;

- Expansion of VT Transco's East Avenue substation with the installation of two additional transformers; and
- Relocation of a transformer from Burlington Electric Department's (BED) Lake Street substation in Burlington to the substation at the McNeil Generating Station site (VELCO, 2005).

To construct the Project, access routes are required to mobilize people, equipment, and materials to the ROW. The proposed routes were selected by VT Transco to take full advantage of existing travel-ways including gravel roads, driveways and field drives. In this respect, the need for tree clearing is minimized, wetlands are avoided, and construction crews can cross streams utilizing existing crossings (e.g., culverts), to the maximum extent possible. With only a few exceptions, access to the ROW is gained via existing, well-established travel-ways.

However, for the planning and permitting phases, it is important that accurate information is available on the location of wetlands and streams adjacent to the access routes. Wetland/stream delineation of adjacent areas provides information regarding inherent constraints for expansion of the travel-width and surface improvements that could otherwise be needed for the Project.

In 2006, Pioneer delineated jurisdictional wetlands and streams within, and directly adjacent to, the existing and proposed ROW, as well as on some of the on-ROW access roads. The locations of proposed off-ROW access routes were identified by VT

Transco, with the exception of two access routes identified in the field by Pioneer during this 2007 survey. An access route near Saint Michael's College to the Eastern Peninsula of the Twin Bridges area was GPS-surveyed in the field, as was an access route on the lands owned by S.D. Ireland in Burlington. All of the access routes serve to provide access to the ROW from adjacent public roads for construction of the 115 kV transmission lines for the proposed Project.

Pioneer surveyed a 50-foot wide corridor along each proposed off-ROW access route (25-feet from the center of the off-ROW access) as well as two areas where ROW realignments are proposed. The two ROW realignment areas consist of minor changes in the angle of the lines where the proposed ROW would extend beyond the previously-surveyed ROW, thereby necessitating an additional investigation. In general, most of the proposed off-ROW access routes are located along existing access infrastructure, including residential driveways, forest trails, field drives, and agricultural field roads. In 2007 Pioneer investigated 25 off-ROW access routes identified by VT Transco as potential access routes for construction of the 115 kV transmission lines for the proposed Project (see page 2 of Appendix 1 for list and description of off-ROW access routes). Two additional access routes were identified and evaluated by Pioneer in the 2007 field review as potential access routes. Including routes located completely within the ROW, surveyed in 2006, a total of 33 access routes were evaluated as part of Pioneer's effort. The two realignment areas consist generally of upland farmland and forest. Jurisdictional wetlands and streams, as well as RTE plant species, were

delineated along each proposed off-ROW access route and ROW realignment area, and located in the field utilizing GPS survey instruments.

2.0 SITE DESCRIPTION

VT Transco's existing 115 kV transmission line ROW linking its Essex and East Avenue substations is located in the western portion of Chittenden County, Vermont. The ROW, proposed off-ROW access routes, and proposed upgraded substation sites are located in a variety of open and edge communities, wetlands, mid- to late-successional forestland, riverine floodplains, and low- to high-density residential and industrial/commercial developments. The dominant drainage feature of the area is the lower Winooski River and its major tributaries including Allen Brook, Muddy Brook, and Centennial Brook. The landforms that dominate the area surrounding the lower Winooski River include terraced plateaus, rocky gorges, flat floodplains and agricultural fields, residential housing developments, and commercial/industrial facilities. Clay soils deposited by post-glacial lakes and seas, sands from the post-glacial rivers, and outcrops of limestone are the contributing elements of soil development. These factors combine to provide excellent agriculture soils (Thompson and Sorenson, 2000).

A summary of off-ROW access routes is presented on page 2 of Appendix 1. The proposed off-ROW access routes are located along existing roads, trails, or paths including private driveways, field-drives, forested trails, and existing parking lots and access roads within commercial areas. Existing off-ROW travel routes were utilized to

the maximum extent possible to minimize proposed clearing and temporary access road construction, and to avoid impact to wetlands and other natural resources.

The majority of the proposed off-ROW access routes are stable and suitable for use by VT Transco construction equipment with limited enhancements. Three specific areas will require special consideration, with respect to accessing the ROW, due to existing natural resource features. These features include wetlands, RTE plant species and natural communities, as well as existing land-uses. These areas are:

1. Saint Michael's #1: The Twin Bridges Area with proposed access from College Ave./VT Route 15 near Saint Michael's College. Access will be provided to proposed structures N/S-41;
2. Winooski Park #2: This route follows an existing transmission corridor through a wetland within the Winooski Park area, from a proposed access at Canal Street. Access will be provided to proposed structures N/S-44 through N/S-48; and
3. S.D. Ireland #1: This route follows an old access path crossing a wetland on the S.D. Ireland Company concrete plant property. Access is to proposed structures N/S-49 through N/S-50.

Specific resource features and potential impacts associated with each of these routes are described in Sections 3.3, 4.3, and 5.0 below.

In addition to the off-ROW construction routes, VELCO identified a new ROW in Williston near poles S3, N4 and N5 (near Dorset Lane), and N14 through N17 (near River Cove Road) that will have to be acquired for a variety of reasons. These areas were also investigated by Pioneer during 2007.

3.0 WETLANDS

3.1 Delineation Methodology

Wetland delineations in the field were made according to the *1987 U.S. Army Corps of Engineers Wetland Delineation Manual* (1987 Manual) (U.S. Army Corps of Engineers, 1987). Delineations were conducted under the “Routine Determinations, Subsection 2, On-site Inspection” outlined in the 1987 Manual. This manual has been approved for all delineations that are subject to the Vermont Wetland Rules and U.S. Army Corps of Engineers (USACE) wetland impact permitting under Section 404 of the Clean Water Act. Delineations for the proposed off-ROW construction access for the Project were completed during May and June, 2007.

The wetland survey corridors located outside of the Project ROW included:

1. a 50-foot corridor centered on the proposed off-ROW access routes as identified by VT Transco
2. a 50-foot corridor centered on the two proposed off-ROW access routes identified by Pioneer

In addition, the ROW realignment areas described above were also investigated. Wetlands that continued outside the survey areas were observed and characterized in order to assist in determining functions and values classification, and contiguity to wetlands outside of the survey areas.

The 1987 Manual stipulates that under normal circumstances, three criteria are necessary to accurately meet the definition of a wetland: soils, vegetation, and hydrology. Hydric soils must meet hydric indicator status, have a prevalence (greater than 50 percent) of wetland-adapted (hydrophytic) vegetation, and must display evidence of wetland hydrology. Wetland hydrology criteria includes observed inundation, saturated soils, water staining of trees and/or ground-material, drainage patterns or drift lines, and oxidized rhizospheres. Ditches or constructed ponds exhibiting the three criteria, if it can be determined that such features are due to excavation that originally occurred in upland, were not included in the delineation. However, these features were identified if they were determined to be contiguous with a stream or naturally occurring wetland.

Jurisdictional wetlands within the above-mentioned survey areas were located in the field using Trimble® GPS surveying instruments. The GPS unit is capable of sub-meter accuracy, and utilizes H-Star™ technology to maximize the number of satellites used during point location, thereby allowing for multiple base stations to be used during post-processing. All GPS data collected in the field was differentially corrected and shape-corrected to refine the accuracy of the data.

Wetlands were flagged in the field with pink survey tape or ground flags labeled “Wetland Delineation”. Flagging was coded with the year and wetland number, along with the individual flag number (e.g., 2007-1 #1). Field notes were recorded on-site along with notes pertaining to wetland classification, potential impact considerations, any unique qualities, and wetland functions and values. Wetlands were classified based on the *Classification of Wetlands and Deepwater Habitats of the United States* (Cowardin, et.al.,1979). Wetland functions and values were evaluated based on the field notes and observations according to the USACE, *Highway Methodology Workbook: Supplement* (1999), and worksheets were generated for each wetland. Soil and vegetative transects were completed for representative examples of the identified wetlands in order to document boundary delineations.

3.2 Identified Wetlands

Pioneer identified jurisdictional wetlands within the wetland survey corridors associated with the proposed off-ROW access routes (see page 3 of Appendix 1 for Wetlands Summary Table). Mapping of water resources, including wetlands and RTE plant species delineated along proposed access routes and within the existing and proposed ROW, is provided in Appendix 2. Wetlands were identified based on Pioneer’s coding, location by town, total mapped area (square feet), Vermont Wetlands Rules wetland class (Class Two or Three), Cowardin classification, principal functions and values, extent of survey, and additional notes. Wetland functions and values are coded as follows:

1. GW: Groundwater recharge/discharge
2. FF: Floodflow alteration
3. F: Fish and shellfish habitat
4. STP: Sediment/toxicant/pathogen retention
5. Nut: Nutrient removal/retention/transformation
6. PE: Production export
7. Sh: Sediment/shoreline stabilization
8. W: Wildlife habitat
9. R: Recreation
10. ES: Educational/scientific value
11. H: Uniqueness/heritage
12. V: Visual quality/aesthetics
13. RTE: Threatened or endangered species habitat

****Note:** Wetland functions and values from USACE (1999); codes adapted from Gilman and Briggs Environmental, *Wetland Delineation Methodology Narrative: June 7, 2006*.

Wetland Function-Value Evaluation Forms were completed for all wetlands identified by Pioneer during the 2007 water resources survey and are located on pages 5 through 14 of Appendix 1. Detailed Data Forms for three transects are included on pages 15 through 21 of Appendix 1. Photographs of selected wetlands are included on pages 22 through 25 of Appendix 1.

3.3 Potential Wetland Impact Areas

As described above, most of the off-ROW impact areas that have been identified would not result in any temporary or permanent impacts to wetlands. Wetlands adjacent to these travelways have been identified such that if changes are required during construction, the presence of wetlands and the potential need for permitting of any temporary or permanent impacts can occur. Two areas have been identified where the proposed off-ROW access routes would cross wetlands:

1. Winooski Park #2: This route crosses a distance of approximately 1,200 feet of wetland 2007-11, a Vermont Class Two wetland, to reach the ROW at proposed structures N/S-45
2. S.D. Ireland #1: This route crosses a distance of approximately 250 feet of wetland 2007-12, a Vermont Class Two wetland, to reach the ROW in the vicinity of proposed structures N/S-50

The impacts associated with these crossings would be expected to be temporary, and can be mitigated through appropriate construction practices. In addition, these will be reviewed by USACE and the Vermont Department of Environmental Conservation (DEC) through their respective permitting programs.

4.0 STREAMS, DRAINAGES, AND DITCHES

4.1 Delineation Methodology

Pioneer delineated jurisdictional streams and drainages within the survey corridors associated with the proposed off-ROW access routes and then located these features using GPS surveying instruments, employing the GPS methodology described previously in this report.

The stream survey corridors located outside of the ROW included:

1. 50-foot corridor centered on the proposed off-ROW access routes as identified by VT Transco
2. 50-foot corridor centered on the two proposed off-ROW access routes identified by Pioneer

Watercourse and drainage features identified within the survey corridor were classified as one of the following four types (U.S. Army Corps of Engineers, 2006):

1. Perennial Stream – A perennial stream has flowing water year-round during a typical year. The water table is located above the stream bed for most of the year. Groundwater is the primary source of water for streamflow. Runoff from rainfall is a supplemental source of water for streamflow.
2. Intermittent Stream – An intermittent stream has flowing water during certain times of the year, when groundwater provides water for stream

flow. During dry periods, intermittent streams may not have flowing water. Runoff from rainfall is a major source of water for streamflow.

3. Ephemeral Stream – An ephemeral stream has flowing water only during, and for a short duration after, precipitation events in a typical year. Ephemeral stream beds are located above the water table year-round. Groundwater is not a source of water for the stream. Runoff from rainfall is the primary source of water for streamflow.
4. Ditch – A ditch, for the purposes of delineation, is a non-jurisdictional, excavated feature created in upland, and not a Water of the United States. Ditches were flagged to enhance the understanding of where surface water is conveyed within and adjacent to a particular site.

Streams, drainages, and ditches were flagged with orange survey tape. Flagging was coded with the stream feature ID, along with the individual flag number (e.g., TB-1 #1A). Perennial and intermittent streams were flagged along the top of bank or top of slope (e.g., TB-X #X), according to the Vermont Agency of Natural Resources (ANR) *Riparian Buffer Guidance: January 20, 2005 – Appendix C*. Ephemeral drainages and ditches were flagged along the center of channel (e.g., SC-X #X). Field notes were recorded on-site, with observations pertaining to classification, bed and bank characteristics, potential impact considerations, and unique qualities of the stream.

4.2 Identified Streams, Drainages, and Ditches

Pioneer delineated streams, drainages, and ditches within the survey corridors associated with the proposed off-ROW access routes and ROW realignment areas (see page 4 of Appendix 1 for Stream Summary Table). Stream mapping data are provided in Appendix 2. Photographs of selected streams are included on pages 22 through 25 of Appendix 1. Streams, drainages, and ditches were identified based on Pioneer's coding, any associated wetlands, stream name, stream description, average Ordinary High Water (OHW) width, stream type, potential crossings, and additional comments. The OHW mark was determined in the field based on guidance provided in the USACE "Regulatory Guidance Letter: Subject – Ordinary High Water Mark Identification," dated December 7, 2005. The average OHW width for each perennial and intermittent stream reflects an approximation of the average distance between the opposing OHW marks on each bank throughout the reach of stream surveyed. The location of the top of bank, or slope, and the approximate OHW width for the streams are included for determining potential impacts to the water features.

4.3 Potential Stream Impact Areas

As described above, most of the off-ROW impact areas that have been identified would not result in any temporary or permanent impacts to streams. Streams located adjacent to these travelways have been identified such that if changes are required during construction, and the potential need for permitting of any

temporary or permanent impacts to these features can occur. Two areas have been identified where the proposed off-ROW access routes would cross streams:

1. Winooski Park #2: This route crosses a perennial stream, 2007-SC-3, utilizing a pre-existing concrete culvert under an established gravel drive, and thus, no impacts are anticipated. It should also be noted that according to the Vermont Hydrographic Dataset (VHD), a stream crosses wetland 2007-11 (see PEA Sheet 16). Upon field investigation, it was determined that this stream dissipates prior to entering the corridor and lacks defined bed or bank features within the corridor. Rather, flow is dispersed due to dense wetland vegetation (*Phragmites australis*) and a sharp decrease in slope. Therefore, this was not determined to be a stream.
2. S.D. Ireland #1: This route crosses stream 2007-SC-4, an intermittent stream located within wetland 2007-12. A temporary crossing of this stream will be necessary.

The impacts associated with these crossings are expected to be temporary, and can be mitigated through appropriate construction practices. In addition, these will be reviewed by ACOE and VT DEC through their respective permitting programs.

5.0 RARE, THREATENED, AND ENDANGERED (RTE) PLANT AND NATURAL COMMUNITY SURVEY

Pioneer identified and cataloged Rare, Threatened, and Endangered (RTE) Plant Species and Natural Communities located within the proposed off-ROW access route corridors, and conducted a supplementary RTE survey within the proposed ROW to further document spring- and early summer-blooming RTE plants within that area. A comprehensive summary table of RTE plant species identified during both the 2006 and 2007 RTE surveys is included on page 1 of Appendix 3.

The findings of the off-ROW and supplemental ROW RTE surveys conducted during 2007 were similar to the findings during the 2006 survey. Identified RTE plant species are concentrated within the Twin Bridges area on rocky, calcareous terrain near the Winooski River. Two additional State threatened plant species, *Oryzopsis pungens* (slender mountain rice) and *Calystegia spithamea* (low bind-weed), were identified in 2007. The slender mountain rice was identified in the Twin Bridges area in the vicinity of the proposed access to N/S-41 south of the railroad tracks and Saint Michael's College. The low bind-weed was identified on the West Peninsula of the Twin Bridges area east of proposed structures N/S-43. This concentration of species should be avoided during construction, as no access routes or structures are proposed in their immediate vicinity. Only one rare species was identified in 2007 outside of the Twin Bridges area, near Patchen Road, and is unlikely to be impacted based upon current project designs.

A summary report and plant list for the 2007 RTE survey prepared by Darien McElwain of Hardwood Mountain Consulting is included on pages 2 through 16 of Appendix 3, and

an updated version of the Element Occurrences (EO) and RTE Map included in the March 6, 2007 report is included on page 17. (Mapping of all RTE species identified in support of the Project is included in Appendix 2.) Element Occurrences (EOs) are maintained by the Vermont Non-game and Natural Heritage Program (NNHP). An EO is the *Occurrence* (current or historical presence in a given area of land or water) of an *Element* (species or natural community type) of conservation concern. More simply, an EO can be defined as the occurrence of a rare species population or exemplary natural community at a specific location (NNHP, 2006).

The presence of these species and natural communities may be used to designate Rare Irreplaceable Natural Areas (RINA) along and adjacent to the project alignment.

Flora

Darien McElwain, Biologist (sub-consultant for Pioneer) conducted a vegetative survey within, and directly adjacent to the Project area, including the off-ROW access routes, during the months of May and June, 2007. Nine separate occurrences of four species of state threatened plants were observed and documented during both the 2006 and 2007 RTE plant surveys. These species are concentrated at the Twin Bridges area, with one species located on the Gorge Island. The unverified occurrence of *Morus rubra* (red mulberry) identified in 2006 has been determined using herbarium records and flowering characteristics to be the common white mulberry (*Morus alba*). Additionally, the occurrence of harsh sunflower (*Helianthus strumosus*) near River Cove Road

has been determined following the 2007 investigation to be a non-RTE *Helianthus* species. These occurrences have been removed from the RTE table and all mapping. All state threatened species are protected by Vermont's Endangered Species Law, 10 V.S.A. Chap. 123.

As discussed in Pioneer's report on the 2006 investigation, three unique natural communities were identified in the field. These consist of a Silver Maple – Ostrich Fern Riverine Floodplain Forest located on the Gorge Island in the Winooski Park area and on the Winooski Island in Williston, Temperate Calcareous Outcrops and Cliffs on the Twin Bridges Site, and a White Pine – Red Oak – Black Oak Forest in Centennial Woods. In general, proposed off-ROW access routes are not located within unique natural communities. Three exceptions include the following areas:

1. Saint Michael's #1: The Twin Bridges site is mapped as a Temperate Calcareous Outcrop and Cliffs and includes the southern end of the proposed off-ROW access route to that area; a White Pine-Red Oak-Black Oak Forest grading to a Pine-Oak Heath Sandplain Forest is located along the access route.
2. Winooski Park #2: The Gorge Island or Winooski Park area is mapped as a Silver Maple-Ostrich Fern-Riverine Floodplain Forest and includes the entirety of the proposed off-ROW access routes in that area.

3. S.D. Ireland #1: A portion of this off-ROW access route is also mapped as a Silver Maple-Ostrich Fern-Riverine Floodplain Forest.

These areas will require special consideration with respect to avoidance and mitigation measures during the permitting and implementation phases of the Project.

6.0 SUMMARY

Pioneer identified jurisdictional wetlands, streams, and drainages associated with the proposed off-ROW access routes and proposed ROW realignment routes for the Project, during late spring / early summer 2007. The proposed access routes that are outside the ROW include maintained roads, private driveways, farm roads, and abandoned woods trails that are located within the existing matrix of residential, commercial, agricultural, and forested lands within Chittenden County. The proposed ROW realignment routes generally consist of farmland and forested upland with no new wetlands or streams identified. During the 2007 survey, Pioneer also investigated the proposed off-ROW access routes for the presence or absence of RTE species, and to assess the potential for RINA communities. Finally, verification of on-ROW RTE identifications, which required springtime observation of flowering plants, was completed.

- Wetlands – Pioneer identified jurisdictional wetlands within the off-ROW survey areas. The wetlands identified were classified as either Class Two

wetlands or Class Three pursuant to the Vermont Wetland Rules. These wetlands represent a variety of wetland types including emergent, scrub-shrub dominated, and forested features. Pioneer also identified excavated, non-jurisdictional water features including stormwater ponds that are located near proposed access routes. The identified wetlands range from natural systems that have not been significantly impacted to wetlands that have been impacted or enhanced by anthropogenic influences including road construction, hydrologic alterations, and other modifications to the surrounding land. Additionally, many of the features are isolated wetland systems located near a proposed access route, and others are extensions of wetland features previously identified by Pioneer along the ROW corridor. By selecting access routes that utilize existing travelways, only two off-ROW wetlands (2007-11 and 2007-12) will be crossed based on the access routes as currently planned.

- Streams and Drainages – The streams and drainages identified by Pioneer include perennial and intermittent streams, along with ephemeral drainages, and non-jurisdictional ditches. The streams are primarily unnamed tributaries to the Winooski River. Some features are associated with wetlands and others are isolated drainages. By selecting access routes that utilize existing travelways, only two off-ROW streams would be crossed; 2007-SC-3 and 2007-SC-4. Since one of these is currently

culverted (2007-SC-3), and a temporary bridge can be used for the other, no new impacts would occur.

- RTE Plant Species – During the 2007 survey, two additional State threatened species were identified within the ROW and along proposed off-ROW access routes, along with additional occurrences of state threatened species identified during the 2006 RTE survey. These species were concentrated in the Twin Bridges area and the southern end of the Saint Michael's #1 access route. The unverified occurrence of *Morus rubra* (red mulberry) identified in 2006 was determined to be the common white mulberry (*Morus alba*). Additionally, an occurrence of harsh sunflower identified in 2006 near River Cove Road has been determined to be a non-RTE species. These occurrences have been removed from the RTE table and from mapping.
- Rare Irreplaceable Natural Areas (RINA) – No new unique natural communities were identified within the ROW or along proposed off-ROW access routes during this supplemental survey conducted in 2007. Previously-identified unique nature communities are found at the Twin Bridges area and the Gorge Island/Winooski Park areas. Temperate Calcareous Outcrops and Cliffs and Silver Maple-Ostrich Fern-Riverine Floodplain Forests are found at the Twin Bridges and Gorge

Island/Winooski Park areas, respectively. The Twin Bridges access route also contains a White Pine-Red Oak-Black Oak Forest community.

As stated in the initial report, federal and state permits will be required for the construction of the Project. In applying for the necessary permits, the Applicants will consider and quantify natural resource impacts, and develop a project-specific EPSC plan that complies with the state's stormwater regulations. The off-ROW access routes will be considered in identifying and quantifying water resource impacts, and developing a project-specific EPSC plan. To this end, provisions will be made to complete construction on frozen ground, under dry conditions or using matting within sensitive areas, install temporary bridges to cross waterways, incorporate EPSC measures, and follow best management practices (BMPs) for ROW clearing and construction.

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