



## State of New Jersey

### DEPARTMENT OF ENVIRONMENTAL PROTECTION

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BOB MARTIN  
*Commissioner*

October 10, 2011

Regional Director  
Midwest Region  
Attn: Lisa Mandell  
US Fish and Wildlife Service  
Ecological Services  
5600 American Blvd., Suite 990  
Bloomington, MN 55437-1458

Dear Ms. Mandell:

The NJ Division of Fish and Wildlife's Endangered and Nongame Species Program has reviewed the draft Habitat Management Plan prepared by NiSource, Inc. and has the following comments regarding bog turtles in NJ.

During the initial planning meetings with NiSource and The Conservation Fund, NJ provided data on bog turtle sites. In the draft HCP the site names appear in the document and many of those names are descriptive and may identify the actual site location. We would like to see the names of the NJ bog turtle sites changed or replaced with other codes that are less descriptive. It was not our understanding that the site name information provided during meetings with NiSource would become publically available.

Secondly, the NJ bog turtle sites listed for mitigation opportunities are not comprehensive and do not necessarily represent current needs. NJDEP would like the opportunity to revise mitigation opportunities for bog turtles. Mitigation possibilities presented in the document are a product of 10-15 minute brainstorming sessions during the 2 separate meetings with NiSource without biologists having access to their data.

Finally, on page 18 of the draft document, (11133 Dispersal Barriers) there is a concern expressed that due to NJ's dense road network many of our priority mitigation sites may receive a Low Suitability score for this criterion. We are concerned that this may not accurately reflect the importance of the site within the state.

The Division of Fish and Wildlife's Endangered and Nongame Species Program would like to thank you for the opportunity to review and comment on the draft Habitat Conservation Plan developed by NiSource and The Conservation Fund.

Sincerely,

Michael Valent  
Principal Zoologist  
Endangered and Nongame Species Program

