

REPORT OF THE ENVIRONMENTAL ASSESSMENT

TECHNICAL ADVISORY COMMITTEE

SUBMITTED TO THE OFFICE OF STATE PLANNING

JULY 1988

Committee Members

**Richard J. Sullivan
New Jersey First, Inc.**

**Rick Ragan
Ragan Design Group**

**Clifford Day
U.S. Fish and Wildlife Services**

**Paul Arbesman
Allied Signal**

**Bob Fox
AFGAR Associates**

Karl Kehde

**Creigh Rahenkamp
John Rahenkamp
Consultants, Inc.**

**Rocco Ricci
NJ Water Supply Authority**

**Prof. Peter Pizor
Cook College**

**Ian Walker
NJ Sierra Club**

Staff Facilitator

Hilda Blanco

The Environmental Assessment Technical Advisory Committee met four times on April 27, May 17, June 21, and August 2, 1988. The following report presents a summary of the Committee's discussions.

The Committee supports the concept and overall goals and objectives presented in the Draft Preliminary State Plan and strongly endorses measures for improving the environmental quality of the State. The Committee also recognizes that the Commission is charged with the mandate of balancing economic growth and development with the protection of environmental resources. In this regard, the Committee believes that economic development and conservation of natural resources are not incompatible objectives. The Plan should persuasively argue that in order to improve the quality of life, and thereby the land values in New Jersey, a strong program to protect our environmental resources is essential. It should also state that the environment can absorb some impacts without ceasing to be functioning or useful, and that appropriately planned development can coexist with environmental systems.

Charged with the task of assessing the adequacy of the Draft Preliminary State Plan's strategies, policies, and standards to protect the environmental resources of the State, the Committee identified a number of broad areas of concern that the Plan needs to address in order to establish development standards which encourage a better relationship to, and an understanding of our land and natural resources. These are:

- * The need to address water supply and water quality issues
•ore adequately and associated environmental resource factors;
- *The need to address other environmental resources or factors;
- * The Plan should identify enforceable standards where they exist or reference professional standards of practice;
- * The need to explore and promote Purchase and Transfer of Development Rights-type mechanisms;
- * The need to assess the environmental impacts and infrastructure costs of development if trends continue, especially during the interim period before the Plan becomes effective;
- * The need to improve the Plan's strategies to protect environmentally sensitive ecosystems in a more comprehensive

fashion;

- * The need to establish standards for environmentally sensitive areas on a scientific basis;
- * The need to ensure an effective development strategy for the growth areas to facilitate the protection of environmentally sensitive areas;
- *The need to balance economic needs and environmental protection in developing management standards for the use of natural resources;
- * The need to acknowledge the necessity of siting locally undesirable land uses (LULU's) and the increasing local opposition to them;
- * The need to develop an implementation strategy for the Plan;
- * The need for continued Peer Review; and
- * Better Plan organization.

In addition to the broad concerns outlined above, the Committee reviewed in detail those sections of the Plan dealing with environmental issues and made a number of specific recommendations for changes in the text. These are presented in the second section of the report.

A. GENERAL AREAS OF CONCERN

1. Water Supply and Water Quality Issues. Water is a most important natural factor to be protected, and must be considered during the determination of environmentally sensitive areas. The Draft Preliminary Plan does not adequately address water supply issues, nor the protection of ground and surface water outside of those included in Tier 7 areas.

The Committee noted the importance of information about the total "water budget"¹ to support future development. The committee discussed the problems with a strictly engineering approach that minimizes the limits on water supply by emphasizing costly technological or purchase options. An alternative approach needs to take into account the other environmental resources jeopardized by such options, and the need to provide water at a reasonable cost.

The Committee also noted that the Plan needs a firm statement recognizing the current need for the protection of recharge areas in order to preserve the equilibrium of the ground and surface water systems, and the protection of the "water budget*" as stated above.

It is recommended that planning at a municipal and county level ought to be based on watershed characteristics and boundaries, and that the Plan should require or promote this, practice. The Plan should also require municipalities to have current natural resource inventories, and to use them in the preparation of their plans and land use regulations. The municipal inventories should draw on watershed-wide inventories to be prepared on a county or multi-county basis. The Plan should recommend the establishment of the appropriate government agency and of adequate funding for education regarding watershed planning and the preparation of watershed-based inventories.

The Committee also suggests that relationships among watersheds need to be considered. It recommends that to take this into account, planning arrangements for contiguous watersheds be formalized so as to assure consistent approaches. It is also suggested that the State as a whole could be treated as a critical supply area.

2. Other Environmental Gaps. The committee believes that there are a number of natural resources or factors that the Draft Preliminary State Plan does not adequately address. The committee pointed out that the Plan, outside of its policies on scenic corridors, lacks strategies and policies to protect scenic areas. Open space was also pointed out as an area in need of further development in the Plan, especially with respect to institutional structures for their maintenance and recreational open space needs. The lack of attention paid to the need to protect forested areas was also noted. It was also agreed that the statewide environmental strategies should include sections on wetlands and biodiversity.

3. Documentation of Standards. The policies and standards in the Plan should be better documented. There should be an indication in the Plan as to which policies are covered by existing regulations and which call for new initiatives. This could be done either through footnotes or small print in the text. It is also suggested that there should be more exposition of existing programs in the Plan. Similarly, references should be cited to support biological, ecological, and other scientific statements.

The committee also recommends that the Final Plan provide a Technical Guide containing example methodologies for assessing resource losses and gains associated with development at a project scale. This Technical Guide should also address the concept of "mitigation** to avoid, minimize, reduce, or eliminate

and compensate for project impacts. Additionally, the concept of "mitigation banking" should be addressed. This concept may provide a mechanism to reduce or eliminate conflicts in some development situations. This Guide could also include a glossary describing methods and techniques for predicting water quality impacts of effluent discharges/ stormwater runoff and land use changes (QUAL2E, WASP), state-of-the-art habitat evaluations (HEP, IFIM, Plant succession modeling), density determinations (Uniform soil loss equation) and scientific monitoring.

4. Purchase and Transfer of Development Rights (PDR and TDK). Since the Plan should maintain and enhance land values, the committee is concerned with the "taking issue" with respect to the various buffers, corridors, and area-wide densities that the Plan calls for. In order to preclude this problem, the Committee agreed that clustering, TDK-type mechanisms, and public purchase programs must be recognized and utilized by the Plan.

In general, the committee believes that the Plan should address the concept of TDK's directly, since this is a most promising mechanism to preserve land and yet maintain land values for the owners. While there is support in the committee for the concept of enabling legislation for TDK's, one has to be careful that such legislation itself does not become so complex and difficult to administer that it stifles the use of TDR mechanisms. If enacted, legislation should be simple and minimal to encourage and endorse the concept and allow and encourage local planning to experiment with the concept. Many members of the Committee felt that the Plan should promote TDK-type techniques that municipalities currently have the power to enact, such as clustering, non-contiguous Planned Unit Developments (PUD's), and lot averaging. These measures should be linked to appropriate design standards to ensure high quality design and open space. The outright purchase of development rights by the public sector is also an option that the committee endorses.

5. Assessment of Environmental Impacts. The Committee places great importance on the need to evaluate the impacts of development on environmental resources and to establish the costs of mitigating these impacts. In particular, the Committee is concerned that the Plan is not likely to be fully implemented for another ten years because of vested decisions, and the time required to make the appropriate changes in State and local regulations.

The committee recommends that the State Planning Commission direct State agencies to identify the consequences of vested development and its costs in terms of infrastructure needs and natural resources impacts. Such a study would include a regional inventory of past decisions in line with the regions identified in the Plan, as well as an analysis of the consequences of these developments on environmental and infrastructure systems.

The results of the analysis could then be used to assess the adequateness of the tier delineations in protecting natural resources and providing infrastructure at a reasonable cost. Providing the results of this analysis was felt to be essential for municipalities to plan their development in the interim. For example, it was pointed out that no one has identified for West Windsor the problems the municipality will face as a result of current and continued development. Such an analysis could also be an effective way to demonstrate to the public that an extension of present trends will generate negative consequences, such as depleted water, degraded air, diminished wildlife habitats. Also, it would demonstrate that there is a more orderly way to provide for both development and environmental protection, if natural resource implications are understood at the outset and factored into decision-making.

6. The Need for a Systemic Approach to Resource Protection. The Committee questions the fragmentary way in which the Draft Preliminary deals with closely linked environmental and infrastructure systems as presented in both the statewide environmental strategies and Tier 7. For example, the Committee strongly recommends that all water-related elements should be inter-related and presented together in the Plan. Currently, some water elements are protected through Tier 7 policies, and some through the statewide environmental strategies.

In addition, the committee is concerned with the narrowness of the definition of Tier 7. If Tier 7 lands are to be designated as the environmentally sensitive areas in the State, then multiple criteria containing the most important environmental factors to be protected should be utilized, rather than one or two factors. The criteria for this tier, the Committee believes, need to be reexamined and revised to reflect a deeper understanding of the environmental factors and values to be protected.

With respect to a sounder approach to resource protection, it was also noted that the Plan should provide goals and objectives for environmental or ecological systems. It was suggested that the policies and standards of the draft Preliminary are primarily aimed at regulating development and its impacts on natural resources. Members of the committee, however, believe that the Plan's goals for the environment should be proactive so that case by case regulatory decisions fit into a matrix that presents a desirable picture of the future.

The Committee also stressed the need to make clear in the Plan that the intent for Tier 7 is to maintain permanent ecosystems. It should be made clear in the Plan that Tier 7 is not a future zone for development. Some members of the committee, however, pointed out that environmental values could likely change over a 20 year period, and that the Plan is open

for revision every 3 years, so that there are likely to be changes in the tier delineation.

7. A Scientific Basis for Standards. Some members of the Committee believe that the best way to establish and defend the tier system and avoid adverse consequences for natural resources and infrastructure is to develop and rely on a comprehensive carrying capacity approach. Such an approach involves measuring the capacity of a region to accommodate growth and development. Carrying capacity is based on both natural and infrastructure components. Carrying capacity is not fixed, but will change over time. Limitations in natural sources of capacity can, to an extent, be addressed by increasing the infrastructure capacity. Theoretically, the available capacity is determined by subtracting current population from total carrying capacity and involves the allocation of resources and people among and between watersheds and regions. Factors determining capacity should include:

A, Natural

- a. water supply (ground and surface water) on site;
- b. water quality (ground and surface water) on site;
- c. air quality;
- d. soils;
- e. geology;
- f. biota.

B. Infrastructure

- a. water supply (imported);
- b. water quality (sewers, septage management, non-point);
- c. transportation;
- d. communications;
- e. power supplies.

The Committee, in general, feels that this is an approach that has merit and that should be investigated further for use in the Plan as a rationale for population allocation at the State and local level. The Committee agreed that such an approach could be used not so much to change the population projections that the Plan is relying on, but rather to support the regulations established for the tiers.

Furthermore, the Committee believes that the Plan does not provide a technical basis linking the 1 dwelling unit to 20 acres density standard to the protection of natural resources. Although there are multiple factors that may come into play to support density standards, one of these is technical. The Committee feels strongly that the Plan needs to establish its density standards on a scientific basis.

There is also concern over the nitrate dilution model that the Draft Preliminary relies upon. Many of the members of the Committee concurred with the comments of the Department of Environmental Protection on the nitrate dilution model.

Furthermore, the Committee noted that it is possible to

remove nitrates even in individual systems, and that therefore, the utility of the nitrate model may be limited. Some members of the Committee believe that some community systems may be more reliable in total performance than individual units. The committee also noted the difficulty of septic management in communities with many individual systems. The committee agreed that the State Plan should address the issue of managing both individual and community septic systems. On the whole, the Committee believes that although the nitrate dilution model may not be the best measure, it does provide a quick and easy indicator of the problems of cumulative development.

8. An Effective Development Strategy for the Growth Areas. The Committee feels strongly that the success of protecting environmentally sensitive areas hinges on the provision of an effective development strategy for the growth areas. -The Committee urges that the Plan provide adequate incentives to attract development to the growth areas. It was noted during discussions that one of the major incentives the state could provide to ensure the success of the development strategy is infrastructure funding for the growth areas and expedited permit approvals. Development standards that ensure substantial land resources at higher densities within growth areas are essential to the establishment of rooted communities.

9. Management Standards for the Use of Natural Resources. The Committee notes that the Plan does not address the issue of the use of natural resources. Forestry and fishing, for example, are uses of natural resources that should be accommodated even in Tier 7 areas. Standards for the management and use of these resources should be included or referenced in the Plan.

10. Siting Local Undesirable Land Uses (LULU's). The committee believes that the Plan should recognize as a critical planning issue the problem of siting less desirable land uses such as land fills, or hazardous waste sites, prisons, institutions, and even roads. Increasing local opposition to these sitings reflected in the "not in my back yard syndrome" is a significant problem. Although the Plan may not be able to offer a solution, it should acknowledge the problem, since it has serious implications for the timing and costs of public facilities needed to support future development.

Some committee members were concerned that the Plan's designation of an area as Tier 7 could be seen as a rationale for siting less desirable land uses there. Although the committee agrees with the Plan policy of relying on the work of the Hazardous Siting Commission, it recommends that the Plan explicitly state that environmental resources are important to the State, and should be considered in making a determination in the siting of these facilities.

11. heed for an Implementation Strategy. The committee is concerned that the Plan lacks a clear statement of how it is to be implemented. Staff explained that the guidelines contained in the Plan are meant to apply at two levels: a) to serve as a basis upon which state agencies will issue required permits and provide capital funding for infrastructure and other programs; b) through the cross-acceptance process, to lead to the placement of these guidelines in local plans and enforceable land use regulations. Such a statement should be expanded and included in the Plan. In addition, since the Plan is to be implemented to a large extent through State agencies, the committee believes that State agencies should be required to follow the State Plan through the most efficient means possible, such as an executive order from the Governor, or new legislation.

The Committee noted the need for more comprehensive and integrated planning within state agencies, and urges the Plan to incorporate policies to address planning deficiencies within and between State agencies. State agency plans should then be coordinated and made consistent with the State Plan.

12. Continuing Peer Review. The Committee believes that on technical issues such as concern for environmental factors, the Commission should establish a permanent mechanism for peer review. Peer review should include a Scientific Assessment Technical Advisory Committee.

13. Plan Organization and Documentation. The Committee believes that several changes in Plan organization and documentation could strengthen the Plan:

a) On Volume I. The committee suggests that Volume I should be a true executive summary.

b) On Goals and Objectives. The Committee believes that the narrative under objectives in volume I, Chapter 2 of the Draft Preliminary does not add much to the discussion, given the extensive discussion in Volume XI. It is suggested that the Plan should list the objectives under the goals without any narrative.

c) On Providing a Vision. The Committee recommends that the executive summary or public document should make clear the aim of the Plan, its vision. It would be wise to point out in this document the previous legislation that has been enacted to support the objectives of the Plan, and then to point out the remaining gaps that the Plan addresses, and to emphasize the Plan's intent to coordinate all of these efforts. Members of the Committee pointed out that the vision of the Plan is the institution of a statewide planning process, the attempt to integrate and coordinate state objectives, regulations and programs. Other members of the Committee insisted that the vision must also include a more substantive element with three components: a) to create the desired character of New Jersey;

b) to provide a high quality of life for all New Jersey residents; and c) to enhance land values.

Furthermore, this vision should be succinctly stated in ordinary people's terminology. This statement should include the mechanisms that will make the vision implement able in a fair way to the different sectors involved. It should stress voluntary arrangements and experimentation.

d) Need for Graphics. The need for graphics throughout the text was noted. It is suggested that the Plan could use graphics to separate the sections. The use of headings in larger type could also help to organize the Plan better.

8. RECOMMENDATIONS FOR TEXT CHANGES

VOLUME I: Vol. I. page 32

The concept that the "...creation of artificial wildlife habitats..." and "...repeated stocking of streams with fish..." offers equivalent ecological value to naturally-functioning systems is grounded more in hope than in confirming evidence supported by scientific evidence. Periodic replacement of organisms does not compensate for the loss of a species from an area. Species-specific life requisites are met by habitat suitability and the limiting life requisite determine survival of populations.

The word "biodiversity" (biological diversities) should be used in the final document because it provides a measurable indicator of natural biota. Although there is a correlation between the conservation of biodiversity and economic development, the document should address the economics of the benefits of biodiversity preservation.

pp. 35 or 36 (page number unclear-)

Some of the information presented in this chart, particularly under wetlands protection, should be revised. For example, a rating of "Poor/Low*" for the wetlands protection in the Hackensack Meadowlands undermines the intent of Section 404 of the Clean Water Act (U.S.C. 1344 et seq.) that dictates regulatory jurisdiction for most wetlands in this area. In fact, the U.S. Environmental Protection Agency is currently implementing Section 404(c) over a Corps of Engineers permit decision to retain and place fill in wetlands. Furthermore, the rating of "Excellent/High" for stream corridor protection does not reflect the extent of development pressures on, and lack of regulatory enforcement in, these natural areas, particularly the Highlands Physiographic Province. The final document should present criteria that were used to develop the ratings.

p. 37. 31.

The number of animal species listed by the New Jersey Department of Environmental Protection as being in decline (the text states 54) is incorrect.

The information presented in the .text should emphasize wildlife habitats, species habitat suitability and biodiversity.

State designated threatened and endangered species are very important and deserve special emphasis. However, the -degree of emphasis in the text creates the impression that other species are not in danger of extirpation. The importance of all wildlife resources should be recognized before their populations reach threatened or endangered status. Threatened and endangered species are also mentioned in this priority context on page 79 (Volume I).

p. 37. 3h.

Promotion of public access to water is a recreational goal and therefore, inappropriately listed as a natural resource goal.

pp. 39-40.

The intended utility of the information presented in the text is unclear. For example, the conclusion: "To protect stream corridors, setbacks and buffers are needed," should be more definitive to facilitate the management of major drainage basins.

Vol. I. pp. 77-79.

The seven "tiers" upon which the Plan's growth management system is based illustrates a special area management plan. The tiers should be helpful, but handicaps associated with this management approach should also be identified. For example, tiers present an a priori assumption that uniformity will prevail. However, physical, chemical and biological changes are progressive and will not cease to occur. These changes will preclude a balanced, steady state within or between tiers. Moreover, species populations, ecological strata levels, biodiversity and vegetational community succession are dynamic. Tiers, as described in the Plan, conceive a directional change in land uses and natural resources. Such a directional change may be desirable, but may not be controllable. Therefore, the Tier approach requires consideration of: 1) a claim for uniformity and stabilization within and between tiers; 2) intra-and inter-relationships of biota that are not segregated by imaginary boundaries; 3) the progressive manner of ecosystems; and 4) non-predictable conditions.

The final document should clarify how the proposed growth management system will accommodate (or result in a change of) the natural (and accelerated) pace of change that will be evident in future habitat suitability, biodiversity, status of threatened and endangered species, ecological succession, and ecosystem fragmentation.

VOLUME II:

Vol. II. page 18

The text limits the use of underutilized and abandoned railroad rights-of-ways for future transportation needs. These areas also provide opportunities for wildlife corridors, vegetative buffer zones, and recreational areas for consumptive uses of fish and wildlife resources.

Vol. II. page 32

The information presented under "A.2 ENVIRONMENTAL STRATEGIES" should also list and address "wetlands¹¹" and "biodiversity".

Vol. II. page 33

Paragraph 1 should be amended to the effect that n... failure*¹ may lead only to the curtailment of certain industrial development.

Vol. II. page 34 and following pages

In considering the air quality sections, the Committee questioned whether the policy of encouraging concentrated development in villages, corridors or old cities works against the need to meet air quality standards. This issue should be directly addressed in the Plan.

In order for the air quality section to be complete, it should cover the other pollutants for which national standards have been established (particulates sulfur dioxide, nitrogen dioxide). This write-up to be developed by DEP, need only be several sentences long for each.

Hazardous air pollutants should also be addressed. The Committee recommends that the following section be inserted in this section on page 34:

Potentially Hazardous Air Pollutants

The Department of Environmental Protection currently regulates hazardous air pollutants (reference). It also

as well as acceptable activities within buffer areas, and provide supporting documentation for the varying buffers.

Vol. II. page 71 (Standard A.2.7.1.6)

The wording "trout protection" should be "trout production" as defined by the New Jersey Bureau of Freshwater Fisheries. Anadromous fish should also be included under this standard. Furthermore, this standard should emphasize that all disturbance of vegetation be prohibited within buffer areas.

Vol. II. page 72 (Standard A.2.7.1.71)

Less than 300 feet of width for a buffer of woody vegetation will not provide adequate protection for deer wintering areas.

The basis for establishing "wildlife corridors" is unclear. A case-by-case evaluation to determine buffer width is needed. Evaluations of habitat suitability or species tracking (use of an indicator species) could be used as confirming evidence to justify buffer widths. Consultation on this matter should be solicited from the New Jersey Division of Fish, Game and Wildlife.

Vol. II. page 76 (Policy A.2.8.2)

Existing and historical solid waste landfills should be added to the list of areas where development should be prohibited until sufficient data is available to show them to be safe. There are numerous examples in New Jersey of residential sites next to landfills that have resulted in tragic consequences.

Vol. II. pages 77-78

The following are some editorial remarks on the reservoir section. The first line should read "Approximately one-half of New Jersey's supply comes from surface water." Under the aquifer recharge section, the first sentence should read, "The remaining one-half of the state's water supply comes from groundwater resources." On page 78, under excessive groundwater withdrawals, the first line "substantial and plentiful" should be replaced with the word "adequate", and the word "presently" should be inserted after "New Jersey".

Vol. II. page 90 (Standard A.2.9.2.2)

This standard is too liberal and should be rewritten to:

"New development should not store petroleum products or other hazardous or toxic materials without impervious containment adequately designed to control accidental discharges."

conducts an industrial survey to inventory potentially hazardous air emissions. A Right-to-Know requirement makes such information available to communities and the public/ and the Toxic Catastrophe Prevention Act requires major manufacturing facilities to conduct risk assessments of the impact of operational accidents, in cooperation with surrounding communities.

Vol. II. page 37

Exhibit 1 (Air Quality Improvement Areas) should include all National Wildlife Refuge lands as PSD Class 1 air quality areas. National Wildlife Refuges in New Jersey include: 1) Great Swamp National Wildlife Refuge; 2) Forsythe National Wildlife Refuge (Brigantine Division, Barnegat Division); and, 3) Killcohook and Supavna Meadows National Wildlife Refuge areas (managed under Tinicum National Environmental Center). An area in Cape May County is under investigation for inclusion in the refuge system.

Vol. II. page 39

On hazardous air pollutants, add an "f" subpart as follows:

When potentially hazardous air pollutants are involved in an application, a risk assessment may be appropriate.

Vol. II. page 40

The committee questioned whether the entries concerning the coastal area are identical to the policies of CAPRA. They should be the same to avoid confusion or undermining. The Committee agreed that all of the elements of CAPRA policies cannot be included in the Plan: a citation to CAFRA would suffice.

The section should include a reference to the effects of over-development on the quality of coastal waters.

The importance of securing and maintaining public access to the beach should also be addressed in this section.

Vol. II. page 46 tf.

The committee recommends that instead of the standard presented in the Draft Preliminary, the Plan employ a standard for soil erosion based on the Uniform Soil Loss Equation. The Committee also recommends that a policy should be included that recognizes the desirability of developing in moderately sloping areas rather than in agricultural lands or aquifer recharge areas.

Vol. II. page 53

Non-structural flood control methods (e.g., retention and detention basins, wetland and floodplain restoration and creation) should also be mentioned.

Vol. It. page 57

The Plan should include a policy encouraging municipalities that share a watershed to plan together for flood protection.

Vol. II. page 63 ff.

The Committee questions the broadness of the criteria established for designating scenic corridors. As a result too many scenic corridors may be designated. Issues of enforcement and costs to the State should be addressed. The Committee suggests that the policy could be narrowed to scenic corridors of State significance, and leave open to municipalities their designation of corridors of local significance.

A discussion of wildlife corridors should be provided in the section on scenic corridors. Stream corridors could also be linked to wildlife corridors.

Vol II. page 65

The term "stream corridors"¹¹ is unclear because the purpose of the corridor seems to be protective vegetative buffers for aquatic systems. In other sections of the text "corridor" is referred to as a buffer zone for the protection of fish and wildlife resources. Buffers provide various benefits (e.g., runoff and sediment control, nutrient removal, habitat). It would be more helpful to municipal planners to understand buffer considerations according to their intended uses. The wording "vegetational corridors" followed by an adequate discussion would be more definitive.

Vol. II. page 68

The basis for establishing "The appropriate width of a stream corridor 'buffer* area..." should be more definitive and be supported by confirming and not only observational evidence.

Vol. II. pages 69-72

There is a confusing overlap of proposed buffer widths under Standards X.2.7.1.2, A.2.7,1.4, A.2.7.1.6. and A,2.7.1.7. The final document should explain the applicability of each standard

Vol. II. page 230

Refer to comments on the tier system under Vol. I, pages 77-79.