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Via Electronic Delivery

May 22, 2020

Hon Michelle L. Phillips
Secretary
New York State Board on Electric Generation
Siting and the Environment
Three Empire State Plaza
Albany, NY 12223-1350

Re: Case 17-F-0597 – Application of High River Energy Center, LLC for a Certificate of Environmental Compatibility and Public Need Pursuant to Article 10 of the Public Service Law for Construction of a Solar Electric Generating Facility Located in the Town of Florida, Montgomery County.

Dear Secretary Phillips,

Pursuant to the Supplement filed by the Applicant with the Chair on February 14, 2020, the subsequent Compliance Determination issued by the Chair on March 13, 2020, and the discussion amongst the parties and the Examiners during the Procedural Conference held on April 30, 2020, and as also discussed in the filed May 15, 2020 update, attached please find the following information concerning the Alternative Layout described in the Supplement:

- Land Use Assessment
- Preliminary Design Drawings
- Landscaping Plan
- Phase IA/B Archaeological Study
- Terrestrial Ecology and Wetland Impacts
- Visual Impact Assessment Update for the Alternative Layout
- Update to Glint and Glare Analysis

During the Procedural Conference, the Applicant informed the Examiners and the parties that the information described in the Supplement would be filed no later than May 22, 2020. Citizens for Responsible Solar Farm Placement requested the Applicant to determine if any information could be filed sooner. To accommodate that request, the Applicant submitted an update on May 15, 2020, with the balance of the information included in today's submittal.

High River Energy Center Updated Information for Alternate Layout Part 2

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Attachments

- Attachment A. Revised Appendix 11-1. Preliminary Design Drawings
- Attachment B. Revised Appendix 11-1. Landscaping Plan
- Attachment C. Visual Impact Assessment Update for Alternative Layout
- Attachment D. Update to Glint and Glare Analysis – Alternative Layout

As described in the Supplement to the Application filed on February 14, 2020, discussed during the April 30th,2020 Procedural Conference and also discussed in the filed the May 15, 2020 Update, the Alternative Layout for the High River Energy Center includes tax parcel 88.-1-11 (the new parcel), for which the Applicant acquired a lease agreement following the submission of the Application. Pursuant to the Compliance Determination issued by the Chair on March 13, 2020 and the Procedural Conference held on April 30, 2020, the Applicant is filing this document and attachments with additional information concerning the Alternative Layout described in the Supplement. This document serves as Part 2, as described in the May 15, 2020 Update (Update Part 1), and includes the following information and studies, as applicable:

- Part 2, being submitted herein:
 - Land use assessment
 - Site plan drawings
 - Phase IA/B archaeological testing
 - Terrestrial ecology and wetland impacts
 - Glare study
 - Visual impact analysis

Part 2:

General Project Information

The Project will still be located on land leased and/or purchased from owners of private property in the Town of Florida, Montgomery County, NY.

	Initial Application	Alternative Layout
Project Area	1,221 acres	1,425 acres
Study Area	19,141 acres	19,162 acres
Limits of Disturbance	595.06 acres	708.4 acres
Area inside Project fence line	479 acres	582.5 acres
Access Roads	6.56 miles	Permanent Access Road: 7.33 miles Temporary Access Road: 46 feet
Total Collection Line	7.86 miles	8.57miles
Underground Collection Line	40,885 feet	45,276 feet
Collection Substation	0.85 acres	0.85 acres

Interconnection	Approximately 500-foot line	Approximately 500-foot line
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Exhibit 4: Land Use

As described in the Update Part 1, the parcel is located adjacent to an existing participating parcel, east of Thayer Road and north of Bullshead Road. The parcel is classified as agricultural land (Code 120 – field crops) by the New York State Office of Real Property Services (NYSORPS) and is within the mapped Agricultural District 3 for Montgomery County. Plant community mapping (as described in the Application Exhibit 22(a)), classified approximately 166.47 acres of the parcel to be agricultural land, 36.65 acres forestland, 1.18 acres successional shrubland, and 0.42 acres of disturbed/developed land. The compatibility of the Project with the Town of Florida Comprehensive Plan, Montgomery County Agricultural and Farmland Protection Plan, and overall community character of the Study Area (as discussed throughout Exhibit 4 of the Application) will not be affected by the addition of the new parcel.

The land use assessment included in the Supplement to the Application remains the same with regards to land use classification codes (Updated Table 4-2 in the Supplement to the Application). Additional impact calculations have been updated with the Alternative Layout design (see Attachment A) and are described below.

Of the overall 1,425-acre Project Area assessed, only approximately 491.4 acres (34.5 percent) will be physically occupied by Project Components within a fenced area of approximately 582.5 acres to generate 90 MW of renewable energy (Exhibit 4(i)).

Additionally, although the Project is sited within mapped Agricultural Districts, the Facility will only occupy 0.33% of all lands designated as Agricultural Districts within Montgomery County and 2.3% of all lands designated as Agricultural Districts within the Town of Florida (Exhibit 4(a)(1)). Finally, within the Project Area, only 6.9 percent of land to be disturbed by construction and/or operation of the Project is classified as Prime Farmland (Exhibit 4 Introduction).

Table 4-1 below includes the temporary and permanent impacts to soil and Table 4-4 includes impacts to land use types.

Updated Table 4-1. Alternative Layout Impacts to Agricultural Districts and Prime Farmland (Exhibit 4(a)(1))

County	Agricultural District	Temporary Soil Impact	Soil Impact for Project Service Life	Percentage of Impact on Prime Farmland Within County
Montgomery	District 3	124.46 acres	455.85 acres	0.09%

Updated Table 4-4. Impacts to Land Use Types (Exhibit 4(i))

Land Use Type	Components Facility Area (acres)	Access Roads (acres)	Collection Lines (miles)	Substation (acres)
Agricultural	490.43	14.66	7.24	1.23
Roads	1.0	0.14	1.33	N/A
Total	491.43	14.80	8.57	1.23

Other Project Components on Agricultural Land include 99.05 percent of the access roads, and 84.5 percent of collection lines. Collection lines sited within Agricultural Land will be located underground (Exhibit 4(i)).

The total fenced-in area of Project Components to be located on agricultural land (582.5-acres) represents only 7.6 percent of all land identified as agriculture land by the NYSORPS within the two-mile Study Area (7,679 acres). This includes 0.5-percent of all land identified as agriculture land by NYSORPS within Montgomery County (118,064 acres). A total of 14.80 acres of access roads are proposed on land designated as Agricultural Land by NYSORPS (Exhibit 4(i)).

Approximately 7.24 miles of collection lines are sited within land designated as Agricultural Land and 1.33 miles overlapping roadways (Exhibit 4(k)).

Within the Project Area, the Limits of Disturbance include approximately 6.8 percent of land classified as Prime Farmland, 62.8 percent as Prime Farmland if Drained, 22.5 percent as Farmland of Statewide Importance, and 7.9 percent as Not Prime Farmland. Although the solar panels will cover 437.4 acres of agricultural land, only 0.31 acres of ground disturbance will occur

on these lands. Ground disturbance associated with the solar panels is limited to installation of posts for racking systems (Exhibit 4(x)).

Of the 708.4 acres of disturbance, 48.23 acres will occur on land classified as Prime Farmland which is only 1.2-percent of all Prime Farmland within the Town of Florida (Exhibit 4(v)).

The Project Area for the High River Energy Center is 1,425 acres. Approximately 437.4 acres of the proposed buildable acres will be covered by solar panels and the fenced-in area of the Project will be approximately 582.5 acres (Exhibit 4(z)).

Impacts to land uses due to the Alternative Layout are similar to those presented in the proposed layout in the Application and as described in the Alternative Layout presented in the Supplement to the Application, with a marginal increase to affected agricultural land as the additional parcel is primarily agricultural.

Exhibit 11: Preliminary Design Drawings

Preliminary design and detail drawings of the Alternative Layout have been included as Attachment A. The design includes civil site plan, grading, tree clearing plan, construction details, and New York State erosion and sediment controls. Updated design drawings that include any minor adjustments to the design as a result of additional field investigations (which will be completed as soon as possible now that COVID-19 related-restrictions have been lifted) will be submitted when following those investigations. The Landscaping Plan (Appendix 11-1 in the Application) has also been updated to include the new parcel and layout changes for the Alternative Layout. It is included herein as Attachment B.

Exhibit 20: Cultural Resources

A Phase IA/B survey was conducted for the Project in 2019, prior to submission of the Application and the results of that survey were included in the Application (Appendix 20-1). A desktop review of the cultural resources potentially present on the additional parcel was completed. Review of the New York State Office of Parks, Recreation and Historic Preservation (OPRHP) Cultural Resources Information System (CRIS) website revealed no previously recorded sites or archaeological surveys in the vicinity of the additional parcel, besides those already reported in the initial Phase IA/B survey. Historic map research reveals one former structure mapped within the new parcel on the 1895 Amsterdam 15-Minute Quadrangle. The area surrounding the former

structure is considered sensitive for historic archaeological resources. Methods consistent with those outlined in Exhibit 20 and Appendix 20-1 of the Application will be employed to conduct a Phase IB survey for the new parcel. Additional Phase IB surveys will be conducted for minor portions of the Project Area where perimeter fencing, access roads, inverter locations, and tree removal areas were shifted in the Alternative Layout compared to the proposed layout in the Application. The Phase IB field investigations will be conducted as soon as possible now that New York on Pause restrictions are lifted and the results will be submitted following analysis.

An addendum to the architectural history survey will also be conducted as soon as feasible and results will be submitted following the analysis. However, no additional impacts as a result of the additional parcel are anticipated due to the minimal increase in visibility of the Project as discussed further in the Updated VIA.

Exhibit 22: Terrestrial Ecology and Wetlands

A desktop analysis to approximate wetland boundaries and stream locations was conducted and included in the Update Part 1, submitted May 15, 2020 and shown in Attachment F of that submittal. Potential impacts to the predicted wetlands and streams are included in Updated Table 22-11 and Updated Table 23-3, respectively, below. A complete wetland and stream delineation of the new parcel will be performed as soon as possible now that New York on Pause restrictions are lifted. This field investigation will also include an invasive species survey. A final Wetland and Stream Delineation Report and final Invasive Species Management and Control Plan (included as Appendix 22-5 and 22-7, respectively in the Application) will be submitted following completion of field work and analysis.

The assessment of terrestrial ecology and wetlands discussed in the Application and Supplement to the Application remains unchanged and accurate apart from some impact calculations as a result of the Alternative Layout, described below. The land cover types and acreages included in the Supplement to the Application (Attachment N, Updated Table 22-1) also remain unchanged by the updates to the Alternative Layout presented.

As discussed in Exhibit 22 and updated for the Alternative Layout, 15.28 of the 16.32 acres (93.6 percent) of wildlife habitat permanently lost as a result of the Project reside in active agricultural areas which already provide limited perpetual wildlife habitat due to the regular disturbances and anthropogenic pressures of active farming practices (Exhibit 22(f)(4)).

Wetlands represent 46.29 acres, or 3.3 percent, of the Project Area, according to TRC's wetland delineation and approximated wetlands (as described above).

The Limit of Disturbance for the Project is approximately 696.5 acres, within the Project Area, which represents approximately 48.9 percent of the Project Area. Impact assumptions are included in Updated Table 22-2, below. These impact numbers below include impacts due to preliminary grading that was not included in the Supplement to the Application, Attachment N.

Updated Table 22-1. Impact Assumptions (Exhibit 22(b)(1))

Project Components	Vegetative Clearing Area (acres)	Soil Disturbance Area (acres)	Area of Permanent Impact (acres)
Solar Panel Installations	436.33	15.95	0
Access Roads	23.73	23.73	14.80
Collection Lines	5.13	5.13	0
Collection Substation/Switchyard/ Inverters	1.68	1.68	1.4
Laydown Areas	35.57	35.57	0
Fence	1.82	1.82	0

Construction of the Project will result in a temporary disturbance of approximately 37.90 acres of vegetation associated with hayfields and pastures. A total of approximately 477.96 acres of agricultural land will be employed for Project Components for the useful life of the Project (Exhibit 22(b)).

The construction of the Project will also result in the temporary disturbance of approximately 0.04 acre of successional shrubland communities, 0.05 acre of successional old-field communities, and 0.44 acre of developed land communities. Permanent loss will occur to approximately 0.27 acre of successional shrubland communities and 0.03 acre of developed land communities.

Permanent loss of these cover types will occur from the siting of Project components (see Table 22-3, below) (Exhibit 22(b)(1)).

Updated Table 22-3. Vegetation Impact Calculations (Exhibit 22(b)(1))

Cover Type/Habitat	Temporary Impact (Acres)	Permanent Loss (Acres)	Conversion (Acres)
Forestland	0.00	0.78	41.82
Successional Shrubland	0.04	0.27	4.43
Successional Old Field	0.05	0.00	0.02
Open Water	0	0	0
Agricultural Land	38.7	15.28 (Useful Life of Project Only)	533.73 (Useful Life of Project Only)
Developed Land	0.44	0.03	0.39
Total	39.23	16.36	567.11

Updated Table 22-4, below, summarizes the impacts to each land classification based on project component. Impacts calculated below include impacts as a result of preliminary grading that was not completed at the time the Supplement to the Application (Attachment N) was filed.

Updated Table 22-4. Summary Impact Table (Exhibit 22(c)(3))

Project Components	Agricultural Land			Successional Old Field			Successional Scrubland			Forestland		
	Temporary Impacts (acres)	Permanent Loss (acres)	Conversion (acres)	Temporary Impacts (acres)	Permanent Loss (acres)	Conversion (acres)	Temporary Impacts (acres)	Permanent Loss (acres)	Conversion (acres)	Temporary Impacts (acres)	Permanent Loss (acres)	Conversion (acres)
Solar Panel Installations	0	0	422.51	0.0	0	0	-	0	2.09	0	0	12.03 (0 acres of interior forest) ¹
Access Roads	0	13.48	-	0	0	0	0	0.24	-	0	0.75	- (0 acres of interior forest)
Collection Lines	3.22	0	0	0.05	0	0	0.04	0	0	0	0	0.32 (0 acres of interior forest)
Collection Substation/ Switchyard/ Inverters	0	1.41	-	0	0	0	0	0.0	0	0	0.006 (0 acres of interior forest)	0
Staging/ Laydown/Parking Areas	35.39	0	-	0	0	0	0	0	0	0	0	0.13
Fence	0	0	1.47	0	0.003	0	0	0.04	0	0	0.22 (0 acres of interior forest)	0

Note: Project Components may overlap, therefore the values in this table overestimate the impacts to each community type.

1. Additional forestland conversion will occur outside of Project Components, to prevent shading.

Approximately 38.79 acres of wildlife habitat will be temporarily impacted during construction of the Project. However, only approximately 16.32 acres of potential wildlife habitat will be permanently lost due to the placement of Project components. Moreover, 15.28 of the 16.32 acres of potential wildlife habitat permanently impacted, along with all 38.70 acres temporarily impacted, are currently active agricultural areas that are regularly disturbed and which provide limited perpetual habitat for wildlife due to these regular disturbances and anthropogenic pressures of active farming practices (Exhibit 22(f)(4)).

Specifically, it is anticipated that approximately 0.04 acres of successional scrubland, 0.05 acre of successional old fields, and 38.70 acres of active agricultural lands will be temporarily disturbed during construction. No temporary disturbance will occur within forestland. Concurrently, approximately 0.78 acres of forestland, 0.26 acres of successional scrubland, and 15.28 acres of active agricultural lands will be permanently impacted due to the Project (Exhibit 22(f)(4)).

Updated Table 22-10. Impacts to Wildlife Habitat (Exhibit 22(f)(8))

Wildlife Habitat	Conversion (acres)	Temporary Impacts (acres)	Permanent Impacts (acres)	Total Impact (acres)
Agricultural Land	533.73	38.70	15.28	587.71
Successional Old Field	0.02	0.05	0	0.07
Successional Shrubland	4.43	0.04	0.26	4.73
Forestland	41.82	0	0.78	42.6
Total	580.0	38.79	16.32	635.11

A direct and permanent loss of approximately 16.32 acres of wildlife habitat will occur as a result of the Project. Total habitat loss represents 1.15 percent of the total 1,425 acres included in the Project Area. Of this percentage, approximately 4.8 percent of the loss is to forestland, 1.6 percent is to successional shrublands, while the vast majority, 93.6 percent, is to active agriculture. Approximately 41.82 acres of forest land will also be converted into successional communities (Exhibit 22(f)(9)).

Forested area comprises approximately 17.7 percent of land cover within the Project Area. Forestland within the Project Area has been previously cleared for agriculture, resulting in small, non-contiguous fragments (Exhibit 22(f)(9)).

Components (access roads, collection lines, and laydown areas) associated with the Project may remove up to 28.54 forested acres, reducing the amount of forest land from 252.3 to 223.76 acres within the Project Area. This would be a relatively minor reduction, amounting to a loss of 11 percent of forestland within the Project Area (Exhibit 22(f)(9)).

Impacts to wildlife habitat and vegetative communities are similar to those presented in the Application. Total acreage of impacts to wildlife habitat has slightly increased for forest conversion but has decreased for agricultural land impacts.

Wetlands have been approximated for the additional parcel, as previously described in the Update Part 1, and potential impacts based on the Alternative Layout are included in Updated Table 22-11, below. Impacts calculated below include impacts as a result of preliminary grading that was not completed at the time the Supplement to the Application (Attachment N) was filed.

Updated Table 22-11. Temporary and Permanent Wetland Impacts (Exhibit 22(m))

Wetland ID	Cover Class	NYSDEC Wetland ID	Preliminary Design Drawing Page	Temporary Impact (square feet)	Permanent Loss (square feet)	Permanent Conversion	Temporary 100-ft Adjacent Area Impact	Permanent 100-ft Adjacent Area Impact	Impact Type
W-WSB-03	PSS	-	C.309	4,102	2,705	-	-	-	Fence, Grading, Laydown Area
W-WSB-08	PSS	-	C.300	-	29	-	-	-	Riprap
W-ARS-07	PSS	-	C.311	-	1,276	-	-	-	Culvert, riprap, grading
AW-JJB-02 ¹	N/A	-	N/A	164	-	-	-	-	Fence
AW-JJB-03 ¹	N/A	-	N/A	-	716	-	-	-	Access Road, Array
W-BS-6 ¹	N/A	-	N/A	218	6,234	-	-	-	Fence, grading
¹ Wetlands have been approximated using desktop analysis and wetland delineations will be completed when seasonally appropriate. Additional information regarding cover class will be determined at that time.									

These impact calculations will be confirmed and/or further refined once delineations have been completed as seasonally appropriate.

Exhibit 23: Water Resources and Aquatic Ecology

Streams on the additional parcel were approximated through a desktop analysis described in the Update Part 1. The temporary and permanent impacts as a result of the Alternative Layout are included in Updated Table 23-3, below. Impacts calculated below include impacts as a result of preliminary grading that was not completed at the time the Supplement to the Application (Attachment N) was filed.

Updated Table 23-3. Impacts to Streams (Exhibit 23(b)(4))

Field ID	Flow Regime ¹	Linear Feet within Project Area	Potential Jurisdiction	NYSDEC Classification	Temporary Impact (Linear Feet)	Permanent Impact (Linear Feet)	Project Component	Method of Crossing
S-AJF-01	RIN	189.61	USACE	-	0.00	0.00	-	-
S-AJF-02	REPH	243.84	USACE	-	0.00	0.00	-	-
S-AJF-03	RIN	180.50	USACE	C	0.00	0.00	-	-
S-AJF-04	RIN	1,053.57	USACE	C	0.00	0.00	-	-
S-AJF-05	RUP	2696.03	USACE	C	0.00	0.00	-	-
S-AJF-06	RIN	653.66	USACE	-	0.00	0.00	-	-
S-AJF-07	RUP	7261.31	USACE	C	0.00	150.0	Access road, culvert, riprap and grading	Culvert;
S-ARS-01	REPH	454.51	USACE	-	0.00	0.00	-	-
S-ARS-02	RUP	1383.30	USACE	C	0.00	0.00	-	-
S-ARS-03	REPH	448.04	USACE	-	0.00	0.00	-	-

Updated Table 23-3. Impacts to Streams (Exhibit 23(b)(4))

Field ID	Flow Regime ¹	Linear Feet within Project Area	Potential Jurisdiction	NYSDEC Classification	Temporary Impact (Linear Feet)	Permanent Impact (Linear Feet)	Project Component	Method of Crossing
S-ARS-04	RUP	308.11	USACE	C	0.00	0.00	-	-
S-ARS-05	REPH	582.65	USACE	C	0.00	0.00	-	-
S-ARS-06	REPH	320.39	None	-	0.00	0.00	-	-
S-ARS-07	REPH	1,120.43	-	-	2.7	591.0	Access road, culvert, riprap, grading	Culvert;
S-ARS-08	REPH	358.90	None	-	0.00	0.00	-	-
S-ARS-09	REPH	3,048.04	USACE	C	0.00	101.0	Access road, culvert	Culvert;
S-ARS-10	REPH	854.96	USACE	C	0.00	0.00	-	-
S-ARS-11	REPH	197.77	USACE	-	0.00	0.00	-	-
S-ARS-12	RIN/RUP	5242.13	USACE	-	0.00	0.00	-	-
S-ARS-13	REPH	338.70	USACE	-	0.00	0.00	-	-
S-ARS-14	REPH	588.70	USACE	-	0.00	0.00	-	-
S-ARS-15	RIN	5789.21	USACE	C	0.00	26.0	Culvert, riprap	Culvert
S-ARS-16	RIN	185.97	USACE	-	0.00	0.00	-	-
S-BS-09-P	UNK ³	65.27	USACE	C	5.00	0.00	Collector line	Existing road crossing
S-DJL-01	RUP	2,291.10	USACE	-	0.00	0.00	-	-
S-DJL-02	RIN	305.92	USACE	-	0.00	0.00	-	-

Updated Table 23-3. Impacts to Streams (Exhibit 23(b)(4))

Field ID	Flow Regime ¹	Linear Feet within Project Area	Potential Jurisdiction	NYSDEC Classification	Temporary Impact (Linear Feet)	Permanent Impact (Linear Feet)	Project Component	Method of Crossing
S-JJB-01	RIN	2,072.26	USACE	-	7.0	662.0	Access road, collector, grading and fence	Stone fill (access road); Trenching (collector line); Span (array and fence)
S-JJB-03	RIN	828.55	USACE	-	8.0	51.0	Access road,	Stone fill (access road); Trenching (collector line)
S-JJB-04	REPH	234.69	USACE	-	0.00	0.00	-	-
S-JJB-05	RIN	1,000.23	USACE	-	1.00	632	Access road, fence, collector, grading, riprap	Culvert; Trenching (collector line); Span
AS-JJB-16	UNK ³	3967.86 ³	USACE	C	2.0	0.00	Collector line	Existing road crossing
S-WSB-01	RIN/RUP	3551.85	USACE	C	0.00	0.00	-	-
S-WSB-02	REPH	287.10	USACE	-	1.0	0.00	Fence	Span
S-WSB-03	RUP	1254.37	USACE	C	0.00	0.00	-	-
S-WSB-04	RIN	97.24	USACE	-	0.00	0.00	-	-
S-WSB-05	REPH	107.18	USACE	-	0.00	0.00	-	-

Updated Table 23-3. Impacts to Streams (Exhibit 23(b)(4))

Field ID	Flow Regime ¹	Linear Feet within Project Area	Potential Jurisdiction	NYSDEC Classification	Temporary Impact (Linear Feet)	Permanent Impact (Linear Feet)	Project Component	Method of Crossing
S-WSB-06	RIN	710.39	USACE	-	281.0	360.0	Laydown area, fence, grading	Matting (laydown area); span (fence)
S-WSB-07	RUP	3,483.91	USACE	-	0.00	0.00	-	-
S-WSB-09	REPH	391.73	USACE	-	0.00	0.00	-	-
S-WSB-10	RIN	206.87	USACE	-	0.00	0.00	-	-
S-WSB-11	REPH	72.03	USACE	-	0.00	0.00	-	-
S-WSB-12	REPH	148.57	USACE	-	0.00	0.00	-	-
S-WSB-13	REPH	395.56	USACE	-	0.00	0.00	-	-
S-WSB-14	RIN	2,447.15	USACE	-	1.00	89.0	Access road, fence, culvert, riprap, grading	Culvert; span (fence)
S-WSB-15	RIN	80.50	USACE	-	0.00	0.00	-	-
S-WSB-16	RIN	27.49	USACE	-	0.00	0.00	-	-
S-WSB-17	RIN	387.89	USACE	-	0.00	0.00	-	-
S-WSB-18	RIN	190.95	USACE	-	0.00	0.00	-	-
S-WSB-19	REPH	287.15	USACE	-	0.00	0.00	-	-
S-WSB-20	REPH	205.29	USACE	-	0.00	0.00	-	-
S-WSB-21	REPH	352.15	USACE	-	0.00	0.00	-	-
AS-JJB-01	UNK	1770.20	USACE		31.0	0.00	Fence	Span

Updated Table 23-3. Impacts to Streams (Exhibit 23(b)(4))

Field ID	Flow Regime ¹	Linear Feet within Project Area	Potential Jurisdiction	NYSDEC Classification	Temporary Impact (Linear Feet)	Permanent Impact (Linear Feet)	Project Component	Method of Crossing
AS-JJB-02	UNK	2707.98	USACE	-	3.0	1,069	Access road, fence, grading	Undetermined at this time
AS-JJB-03	UNK	777.32	USACE	-	17.0	72.0	Access road, collector, fence, grading	Undetermined at this time
AS-JJB-04	UNK	611.77	USACE	-	0.00	0.00	-	-
AS-JJB-05	UNK	757.43	USACE	-	0.00	0.00	-	-
S-BS-04-Predicted	UNK	62.15	USACE	-	0.00	0.00	-	-
S-BS-06-Predicted	UNK	2517.69	USACE	-	0.00	0.00	-	-
A (predicted)	UNK	1815.56			1.0	201.0	Access road, fence, grading	Undetermined at this time
B (predicted)	UNK	757.43			4.0	24.0	Access road, collector, fence, grading	Undetermined at this time
C (predicted)	UNK	776.70			1.0	537.0	Access road, fence, grading	Undetermined at this time
D (predicted)	UNK	552.25			1.0	229.0	Fence, grading	Undetermined at this time

1. Flow Regime: REPH – Ephemeral, RIN – Intermittent, RUP – Perennial, UNK - Unknown
2. HDD – Horizontal Directional Drilling
3. Stream located outside of Project Area, but within route of collection line

These impact calculations will be confirmed and/or further refined once delineations have been completed as seasonally appropriate.

Exhibit 24: Visual Impacts

An update to the Visual Impact Assessment (included as Appendix 24-1 in the Application) is included herein as Attachment C. The update includes a viewshed analysis, updated and new simulations, and simulation ratings as attachments. The changes in the amount of visibility within the Visual Study Area as a result of the Alternative Layout compared to the Application is less than 1% and is not significant. While the results of the visibility analyses in this Updated VIA either show minor changes in predicted visibility or revised or new locations with a view of the Project, the overall conclusions regarding visual impacts during operation as cited in Section 14.0, of the Appendix 24-1 of the Application, do not change.

A Glint and Glare Analysis was performed for the Alternative Layout in order to identify any potential impacts on nearby residences and roads. Based on the results of the analysis and the proposed mitigation measures, no significant impacts from glare are expected as a result of the Project's Alternative Layout. Refer to the Attachment D for details on the glint and glare analysis.