New York State Electric & Gas Corporation

Part 102 Report

Fraser and Delhi Substations 115-Kilovolt Transmission Line Reroutes: Phase 2 for Oneonta South Area Improvement Project

Towns of Hamden and Delhi, Village of Delhi, and Hamlet of Fraser

Delaware County, New York

Dated: November, 2021

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1.0 INTRODUCTION

New York State Electric & Gas Corporation (NYSEG) has prepared this report to comply with the requirements of Title 16 New York Codes, Rules, and Regulations (NYCRR) Part 102: Installation of Non-Article VII Electric Transmission Facilities (Part 102), which regulates the installation of certain transmission facilities not subject to Article VII of the Public Service Law.

The proposed construction that NYSEG is reporting to the Public Service Commission (Commission) in this Part 102 Report is the rerouting and upgrading of five existing overhead 115-kilovolt (kV) transmission lines in the Towns of Hamden and Delhi and the Village of Delhi, all in Delaware County, New York. NYSEG's proposed rerouting and upgrading of these lines (defined in this Part 102 Report as the Project) is Phase 2 of NYSEG's 6-phase Oneonta South Area Improvement Project (OSAIP).

The five overhead 115 kV transmission lines (the Project Lines) are NYSEG's Lines 916, 917, 919 and 949 and "Tap Line 951" (as defined below). See Appendix A, Figure 2: Existing Project Lines, for the current route of the portion of each Project Line relevant to the Project. NYSEG proposes to reroute these overhead transmission lines along new NYSEG right-of-way (ROW) parallel to (and west of) existing ROW of NYSEG and the New York Power Authority (NYPA) to a new 115 kV yard at NYSEG's Fraser Substation. NYSEG is currently constructing the new 115 kV yard at Fraser Substation as part of Phase 1 of the OSAIP.

The Project is needed in order to meet federal reliability standards mandated by the North American Electric Reliability Corporation (NERC) Brightline Order, which was adopted in part by a 2010 Federal Energy Regulatory Commission (FERC) Bulk Electric System (BES) redefinition. This FERC initiative redefined BES transmission elements to include those which operate at 100 kV and above. NYSEG proposes to upgrade the Project Lines to at least 115 kV specifications in order to meet these enhanced federal reliability standards. In addition, the reliability upgrades will create a second contingency transmission source for NYSEG's Oneonta South Service Area. NYSEG proposes to commence Project construction in August 2022 and to place the rerouted transmission lines in service by January 2024.

2.0 PROJECT DESCRIPTION

2.1 Project Site

The area upon which the Project will take place (the Project Site) is approximately 163.3 acres. See Appendix A, Figure 1: Project Site. It is comprised of various utility and privately owned properties within or adjacent to new and existing NYSEG ROW and adjacent to existing NYPA ROW near the existing Fraser and Delhi Substations, the proposed new 115 kV yard at Fraser Substation, the existing Delhi Substation, and temporary laydown areas.

The majority of disturbance from the Project will take place within new ROW, all of which will be adjacent to previously disturbed areas and existing maintained ROW. Project impacts will primarily occur on and adjacent to NYSEG and NYPA ROW, with minimal tree clearing occurring north and west of Fraser Substation for the reroutes and associated new structures. The details and associated impacts of each line are discussed in detail throughout this report.

2.2 Scope of Work

The reroutes of the Project Lines in the Project will require installation of the new facilities set forth in the following table, all of which will be located entirely within existing or new ROW, and will require removal of the existing facilities set forth in the following table, all of which are located entirely within existing ROW:

Table 1. Existing and Proposed Structures for All 115 kV Reroutes

Number of New Structures	New Structure Type	Existing Structure Type	New Structure Height (feet)	Existing Structure Height (feet)
54	Self-supporting tangent Steel	H-frame Wood	75-130	65-90

See Appendix A, Figure 3: Aerial Location and Appendix B: Project Plans for more details. The Project work on each Project Line is discussed below.

Line 916

Line 916 is an existing 115 kV transmission line that currently connects Delhi Substation to NYSEG's Axtell Substation, located approximately 18 miles northeast of the Project Site in the Town of Stamford, New York. The existing line enters the Project Site from the northeast in the Town of Delhi and turns south to connect to Delhi Substation. In the Project, the portion of Line 916 northeast of the point where it turns south will be connected to the east end of the portion of existing Line 949 that runs from that point north for approximately 0.3 miles and then west for approximately 3 miles. That portion of existing Line 949 will be redesignated as Line 916. The existing structures and conductors of the remaining approximately 0.8 miles of existing Line 916 north of Delhi Substation will be removed.

At the west end of that portion of existing Line 949 to be redesignated as Line 916, the Project will include the installation of new transmission line facilities within new NYSEG ROW over approximately 0.7 miles running south to connect to the new 115 kV yard at Fraser Substation. At Fraser Substation, the Project work on Line 916 will end at the point on the substation property where the new facilities will be connected to a portion of underground transmission line that will already be installed as part of the Fraser Substation work performed in Phase 1 of OASIP.

An overview of the portions of Line 916 proposed to be modified in the Project is shown in Appendix A, Figure 4: Proposed Line 916 Overview.

The modifications of Line 916 in the Project will require installation of the new facilities set forth in the following table, all of which will be located entirely within existing or new ROW, and will require removal of the existing facilities set forth in the following table, all of which are located entirely within existing ROW:

Table 2. Existing and Proposed Structures for Line 916 Reroutes

Number of New Structures	New Structure Type	Existing Structure Type	New Structure Height (feet)	Existing Structure Height (feet)
10	Self-supporting tangent Steel	H-frame Wood	75-130	65-90

Line 917

Line 917 is an existing 115 kV transmission line that currently ties Delhi Substation to Andes Substation, located approximately 11 miles southeast of the Project Site in the Town of Andes, New York. The existing line enters the Project Site from the southeast and terminates at Delhi Substation. In the Project, a portion of Line 917 will be relocated and reconductored so as to disconnect from and route around the south and east sides of Delhi Substation and connect to the southeast end of the portion of existing Line 919 that currently runs from Delhi Substation. The existing structures and conductors of the approximately 320 foot portion of existing Line 917 that currently connect the line to the southeast side of Delhi Substation will be removed as part of the Project. (As described in the Line 919 discussion below, Line 919 also will be disconnected from Delhi Substation as part of the Project.) The portion of existing Line 919 that runs north for one mile and then west for three miles, parallel to existing Line 949 in existing ROW, will be redesignated as Line 917. From the west end of that portion of existing Line 919 to be redesignated as Line 917, the Project will include the installation of new transmission line facilities within the same new NYSEG ROW as established for Line 916 to connect to the new 115 kV yard at Fraser Substation. As with Line 916, the Project work on Line 917 at Fraser Substation will end at the point on the substation property where the new facilities will be connected to a portion of underground transmission line that will already be installed as part of the Fraser Substation work performed in Phase 1 of OASIP.

An overview of the portions of Line 917 proposed to be modified in the Project is shown in Appendix A, Figure 5: Proposed Line 917 Overview.

The modifications of Line 917 in the Project will require installation of the new facilities set forth in the following table, all of which will be located entirely within existing or new ROW, and will require removal of the existing facilities set forth in the following table, all of which are located entirely within existing ROW:

Table 3. Existing and Proposed Structures for Line 917 Reroutes

Number of New Structures	New Structure Type	Existing Structure Type	New Structure Height (feet)	Existing Structure Height (feet)
10	Self-supporting tangent Steel	H-frame Wood	75-130	65-90

Line 919

Line 919 is an existing 115 kV transmission line that currently connects Delhi Substation to Oakdale Substation, located approximately 70 miles southwest of the Project Site in the Town of Union, New York. The existing line enters the Project Site at its northwest corner, adjacent to and south of Line 949, approximately 1 mile northwest of Fraser Substation. It then continues east to connect to Delhi Substation. In the Project, Line 919 will be rerouted to the southeast about 500 feet after it enters the Project Site from the northwest. This reroute will be accomplished by the installation of new transmission line facilities within new NYSEG ROW parallel to (and west of) existing NYSEG and NYPA ROW. The new route will be adjacent to the new route of Line 949 (detailed below) until its terminus in the new 115 kV yard at Fraser Substation. An approximately 0.9 mile portion of existing Line 919, where it currently connects to Delhi Substation, will be removed as part of the Project and the line's resulting southeast end will be connected to Line 917 (as described in the Line 917 discussion above). The Project work on Line 919 at Fraser Substation will end at the point on the substation property where the new facilities will be connected to a portion of underground transmission line that will already be installed as part of the Fraser Substation work performed in Phase 1 of OASIP. Most of the remaining portion of existing Line 919 east of the reroute will be redesignated as Line 917 and will continue, ultimately, to Andes Substation.

An overview of the portions of Line 919 proposed to be modified in the Project is shown in Appendix A, Figure 6: Proposed Line 919 Overview.

The modifications of Line 919 in the Project will require installation of the new facilities set forth in the following table, all of which will be located entirely within existing or new ROW, and will require removal of the existing facilities set forth in the following table, all of which are located entirely within existing ROW:

Table 4. Existing and Proposed Structures for Line 919 Reroutes

Number of New Structures	New Structure Type	Existing Structure Type	New Structure Height (feet)	Existing Structure Height (feet)
15	Self-supporting tangent Steel	H-frame Wood	75-130	65-90

Line 949

Line 949 is an existing 115 kV transmission line that currently connects Delhi Substation to Jennison Substation, located approximately 24 miles west of the Project Site in the Town of Bainbridge, New York. Line 949 also has a 3-mile tap into Railroad Street Substation in the Town of Sidney, New York. The existing line enters the Project Site at its northwest corner, adjacent to and north of Line 919, approximately 1 mile northwest of Fraser Substation. It then continues east to connect to Delhi Substation. In the Project, Line 949, starting at a point about 500 feet after it enters the Project Site from the northwest, will be rerouted to the southeast. As with Line 919, this reroute will be accomplished by the installation of new transmission line facilities within new NYSEG ROW parallel to (and west of) existing NYSEG and NYPA ROW. The new route will continue southeast, adjacent to the existing ROW, for approximately 0.2 miles then turn east where it will continue in a new NYSEG ROW, adjacent to existing ROW, for approximately 0.4 miles until its terminus in the new 115 kV yard at Fraser Substation. The Project work on Line 949 at Fraser Substation will end at the point on the substation property where the new facilities will be connected to a portion of underground transmission line that will already be installed as part of the Fraser Substation work performed in Phase 1 of OASIP. An approximately 0.7 mile portion of existing Line 949 where it currently connects to Delhi Substation will be removed as part of the Project.

Most of the remaining portion of existing Line 949 east of the reroute will be redesignated as, Line 91, and will continue, ultimately, to Sidney Tap Substation. A new structure will be added and an existing structure will be removed at the end of the remaining portion of existing Line 949 east of the reroute.

An overview of the existing and proposed to be rerouted portions of the Line are shown in Appendix A, Figure 7: Proposed Line 949 Overview.

The modifications of Line 949 in the Project will require installation of the new facilities set forth in the following table, all of which will be located entirely within existing or new ROW, and will require removal of the existing facilities set forth in the following table, all of which are located entirely within existing ROW:

Table 5. Existing and Proposed Structures for Line 949 Reroutes

Number of New Structures	New Structure Type	Existing Structure Type	New Structure Height (feet)	Existing Structure Height (feet)
14	Self-supporting tangent Steel	H-frame Wood	75-130	65-90

Tap Line 951

Tap Line 951 is NYSEG's approximately 3.9-mile overhead 115 kV transmission line to Fraser Substation from a tap on the Delhi/Colliers line section of NYSEG's existing Line 951[1] located approximately 1 mile north of the Delhi Substation (the Fraser-Delhi/Colliers Tap). Tap Line 951 enters the Project Site north of Delhi Substation, runs to the west to Fraser Substation and then enters into the east side of that substation. In the Project, Tap Line 951 will be rerouted to the east side of the new 115 kV yard at Fraser Substation and an approximately 710-foot portion of the existing overhead line that connects to the substation will be removed. At Fraser Substation, the Project work on Tap Line 951 will end at the point on the substation property where the new facilities will be connected to a portion of underground transmission line that will already be installed as part of the Fraser Substation work performed in Phase 1 of OASIP. From there, Tap Line 951 will continue east in the NYPA ROW for approximately 550 feet within the Project Site, then continue on to the Fraser-Delhi/Colliers Tap.

An overview of the portions of Tap Line 951 proposed to be modified in the Project is shown in Appendix A, Figure 8: Proposed Tap Line 951 Overview.

The modifications of Tap Line 951 in the Project will require installation of the new facilities set forth in the following table, all of which will be located entirely within existing or new ROW, and

[1] NYSEG's Line 951 was Article VII certified in 1976 in Case 26723 for construction between NYSEG's Delhi and Richfield Springs Substations, and to also connect to its Colliers Substation. Line 951 was placed in service in November 1981. In 1988, NYSEG filed a Part 102 Report that described its proposal at that time to build Tap Line 951. In 1990, a minor change to the Environmental Management and Construction Plan for Line 951 was approved by the Secretary to the Commission to facilitate this tap. Phase 5 of the OSAIP includes NYSEG's proposed removal of the approximately 1-mile portion of Line 951 between the Fraser-Delhi/Colliers Tap and Delhi Substation. Because that portion of Line 951 is Article VII certified, NYSEG will file an application for amendment of that Article VII certificate.

will require removal of the existing facilities set forth in the following table, all of which are located entirely within existing ROW:

Table 6. Existing and Proposed Structures for Tap Line 951 Reroutes

Number of New Structures	New Structure Type	Existing Structure Type	New Structure Height (feet)	Existing Structure Height (feet)
5	Self-supporting tangent Steel	H-frame Wood	75-130	65-90

Project Construction

The Project includes some clearing and vegetation removal (see Section 3.2) and installation of the structures for the rerouted Project Lines. The new installations will be self-supporting steel, tangent structures ranging in height from 75 to 130 feet above ground. The majority of these structures will be direct embedded to a depth of 10 to 15 feet. Some structures will require a concrete caisson foundation such as where the transmission line requires an angle or dead end structure. These foundations will be approximately 15 feet wide and 20 to 25 feet deep.

The existing structures and conductors of the portions of the Project Lines to be decommissioned will be removed as part of the Project. Ground disturbance associated with the removal of any structures will be temporary.

Transmission line pulling areas and work pads will be located throughout the Project Site, ranging in size from 60 feet by 40 feet to 150 feet by 100 feet. Permanent and temporary grading is proposed for work pad areas to accommodate hilly topography located throughout the Project Site. The new ROW associated with the 115 kV transmission line reroutes will be managed and maintained using industry standards for vegetation management.

Part 102 Summary

NYSEG has prepared this report in accordance with the requirements of Part 102 because the Project involves the installation of transmission facilities that convey energy at 65 kV or higher voltage for distances of one mile or longer; is not subject to Article VII jurisdiction; increases the number of structures on the ROW; includes substantial modification to existing vegetative cover

on the ROW; and adds new structures that exceed the height of the replaced structures by more than 10 feet.

2.2.1 Part 102.3(a) Priority Areas

Pursuant to Section 102.4, an advantage-disadvantage analysis is required if the proposed Project traverses any of the following Priority Areas described in Section 102.3(a) and listed below.

1. National and state parks, preserves, reservations, landmarks, and monuments formally so designated and acquired for their natural, scenic or cultural value by appropriate state and federal agencies. 16 NYCRR 102.3(a)(1).
2. Historic sites formally so designated by national or state agencies but without acquisition of rights or ownership sufficient for the purpose of preservation. 16 NYCRR 102.3(a)(2).
3. Central business districts in cities and villages. 16 NYCRR 102.3(a)(3).
4. Developed and partly developed residential areas with an existing or proposed density of one or more dwelling units per acre, as shown on approved subdivision maps, occupying a minimum contiguous area of 20 acres. 16 NYCRR 102.3(a)(4).

As indicated on the Part 102 Checklist (see Appendix C) and depicted on the Priority Areas Map (see Appendix A, Figure 9: Part 102.3(a) Priority Areas), none of the four priority areas listed in Section 102.3(a) is triggered by this Project.

As the Project Site is not located within or near any of the priority areas, the advantage-disadvantage analysis set forth in Section 102.4 is not required.

2.2.2 Part 102.3(b) Other Areas

"Other Areas" triggered under Section 102.3(b) are discussed below and depicted in Appendix A, Figure 10: Part 102.3(b) Other Areas.

The Project Site will not traverse any of the following Part 102.3-specified other land uses (see Appendix C: Part 102 Checklist):

1. Areas of outstanding natural or scenic value which are preserved by non-profit private agencies but which have not been formally so designated by national or state agencies. 16 NYCRR 102.3(b)(1).
2. Areas of outstanding cultural value that have been formally designated by a governmental authority. 16 NYCRR 102.3(b)(2).

3. Existing light industrial and commercial areas (e.g., industrial parks, shopping centers, office building complexes). 16 NYCRR 102.3(b)(5).
4. Partially developed residential areas where the subdivision will have an eventual population density of one or more dwelling units per acre, as shown on approved subdivision maps, comprising a minimum contiguous area of 20 acres. 16 NYCRR 102.3(b)(6).
5. Areas of outstanding cultural value (e.g., attractive pastoral scenes, locations of noteworthy architectural and/or social import both within and outside specific sites that lend attractiveness to a neighborhood or community) that have not been formally designated by a government or private authority. 16 NYCRR 102.3(b)(7).
6. Managed woodlands. 16 NYCRR 102.3(b)(10).
7. Existing and planned heavy industrial areas. 16 NYCRR 102.3(b)(12).

Other land uses that will be affected by the Project include the following:

1. Existing local (city, town, village and county) parks and open space areas that have been formally established by government or private authorities. 16 NYCRR 102.3(b)(3).

   A designated snowmobile trail maintained by the Hamden Hill Ridge Riders crosses the Project Site in two locations.

   Line 919

   The snowmobile trail will cross within new ROW for Line 919 north of Fraser Substation. The snowmobile trail will also cross existing ROW near a portion of Line 919 in and agricultural field in the northwest portion of the Project Site.

   Line 949

   The snowmobile trail crosses the same portion of existing ROW where both Lines 919 and 949 will be removed.

   Temporary work or grading will be restored in all of these crossing locations and work may occur during the winter months. However, access to the trails will be maintained during construction. Therefore, no significant impacts to snowmobile trails are anticipated as a result of the Project.

2. Public and semi-public facilities such as cemeteries, educational, correctional, and medical facilities and military installations. 16 NYCRR 102.3(b)(4).

   Line 916

   A portion of the Project Site and a portion of the existing ROW where Line 916 will be removed is located on the property of the State University of New York at Delhi; however, no ground disturbance or significant change in visual impact is

anticipated in this location. Because the structures are to be removed, the Project will result in fewer transmission line structures located within this property. As such, no significant impacts to public facilities are expected as a result of the Project.

3. Residential areas with less population density than those specified in proceeding categories. 16 NYCRR 102.3(b)(8).

   The Project Site is located within a low density residential area in three locations.

   Lines 916 and 917

   The new rerouted area for Lines 916 and 917 north of Fraser Substation cross through a low density residential area. A low density residential area is also located adjacent to Delhi Substation and the rerouted portion of Line 917 around Delhi Substation.

   Lines 919 and 949

   The portions of Lines 919 and 949 being rerouted and removed in the northwest portion of the Project Site cross through two low density residential areas.

   Because all reroutes are within or directly adjacent to existing ROW or substations, no significant impacts are anticipated to the cultural, visual, or land use resources near these homes. Existing overhead lines are near the homes, and the minor rerouting in this location is not anticipated to significantly affect residents' views, nor will it prevent future residential development.

4. Planned and zoned underdeveloped light industrial, commercial, and residential areas. 16 NYCRR 102.3(b)(9).

   Lines 916, 917, 919, and 949

   The Project Site and all of the Project Lines near Delhi and Fraser Substations are located within Town of Delhi Residential and Rural zoning districts. Additionally, the Project Site is located within a Village of Delhi Agricultural - Residential Zoning District where a stabilized construction entrance is proposed on an existing access road. Project construction, transmission lines, and new structures are not anticipated to have substantive changes to cultural, visual, or land use resources within the districts. Therefore, no impacts are anticipated as a result of the Project.

5. Agricultural districts established in accordance with article 25-AA of the Agriculture and Markets Law, and other farmlands. 16 NYCRR 102.3(b)(11).

   All Project Lines

   The Project Site around all of the Project Line reroutes to Fraser Substation are located within an agricultural district near the Fraser Substation. However, no new

structures will be installed in agricultural fields. Therefore, the Project is not anticipated to impact farming capabilities within the agricultural district.

6. Woods and open lands. 16 NYCRR 102.3(b)(13).

Lines 916 and 917

Additional wooded and open land communities are located in new ROW for Lines 916 and 917 north of Fraser Substation.

Lines 919 and 949

Some wooded and open land communities are located along new ROW areas for Lines 919 and 949 along the western side of the Project Site.

These areas of the Project Site are primarily composed of open pastureland, agricultural fields, successional shrubland and northern successional hardwood forest. Some successional shrubland or brushy cleared land may be disturbed by transmission line construction and ongoing ROW maintenance; however, this will occur within an existing maintained ROW. Some tree clearing of successional northern hardwoods and red pine (*Pinus resinosa*) plantation will be required for the reroutes near Fraser Substation. Tree clearing is discussed in more detail in Section 3.2.

3.0 ENVIRONMENTAL RESOURCES EVALUATION

Existing environmental, cultural, and community resources within and adjacent to the Project Site are described below.

3.1 Hydrology and Water Resources

The western side of the Project Site is located within the Platner Brook-West Branch Delaware River sub-watershed (Hydrologic Unit Code [HUC] 020401010201), a sub-watershed of the Upper Delaware River watershed (HUC 02040101) (See Appendix A, Figure 11: Watersheds). The dominant hydrologic feature near this location is West Platner Brook, located approximately 250 feet northeast of the Project Site. Waters from West Platner Brook eventually drain to the Delaware Bay through its connection to East Platner Brook, West Branch Delaware River, and Delaware River.

The eastern, Delhi Substation side of the Project Site is located within the Elk Brook-West Branch Delaware River subwatershed (HUC 020401010106), a subwatershed of the Upper Delaware River watershed. The dominant hydrologic feature near Delhi is West Branch Delaware River, located approximately 280 feet east of the Project Site. Waters from West Branch Delaware River eventually drain to the Delaware Bay.

3.1.1 Surface Waters and Wetlands

Surface waters and wetlands were identified and inventoried within the Project Site through review of existing information, as well as through delineations conducted by professional wetland scientists.

New York State Department of Environmental Conservation (NYSDEC) stream classification mapping indicates there are four State-classified streams within the Project Site. One Class C and one Class C(T) Stream, both located north of Fraser Substation, are unnamed tributaries to West Platner Brook. The remaining two streams, both Class C and located just north and south of Delhi Substation, are unnamed tributaries to West Branch Delaware River. See Appendix A, Figure 12: NYSDEC Mapped Wetlands and Streams for more information.

According the NYSDEC freshwater wetland mapping, there are no State-mapped wetlands within the Project Site. The nearest State-mapped wetland (ID: DL-15, Class 1) is located approximately 1,000 feet southeast of the Project Site.

Based on available wetland mapping by United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI), there are four riverine, two forested, and two unconsolidated bottom pond wetland communities within the Project Site. See Appendix A, Figure 13: NWI-Mapped Resources for more information.

Field delineations were performed in fall 2018, spring 2019, fall 2020, and spring 2021. A total of 12 wetlands and eight streams were identified within the Project Site (See Appendix A, Figure 14: Wetland and Stream Delineation Survey). Wetland boundaries were determined in accordance with the 1987 Corps of Engineers Wetland Delineation Manual and the 2012 Regional Supplement to the Corps of Engineers Manual: Northcentral and Northeast Region. The delineated features are summarized in Table 7.

Table 7. Delineated Wetland and Stream Resources

Wetland ID	Coward Classification	NYSDEC Wetland (Yes/No)	USACE Jurisdictional (Yes/No)
Wetland 7	PSS	No	Yes
Wetland 8	PSS	No	Yes
Wetland 9/16	PSS	No	Yes
Wetland 11	PEM	No	Yes
Wetland 12	PFO	No	Yes
Wetland 13	PEM	No	Yes
Wetland 14	PEM/PUB	No	Yes
Wetland 15	PEM	No	Yes
Wetland 115	PSS/PEM/PUB	No	Yes
Wetland 117	PEM	No	Yes
Wetland 118	PEM	No	Yes
Wetland 119	PEM	No	Yes
Wetland 120	PEM/PUB	No	Yes

Stream ID	Flow Regime	Stream Name/ Connectivity	NYSDEC Stream Class and Standard
Ditch 11	Ephemeral	N/A	unclassified
Stream 110	Perennial	Unnamed tributary to West Platner Brook	C(T)
Stream 111	Perennial	Unnamed tributary to West Platner Brook	Unclassified
Stream 112	Perennial	Unnamed tributary to West Platner Brook	C(T)
Stream 8A	Perennial	Unnamed tributary to West Platner Brook	Unclassified
Stream 14	Perennial/Intermittent	Unnamed tributary to West Platner Brook	Class C
Stream 15	Perennial	Unnamed tributary to West Branch Delaware River	Class C
Stream 8	Intermittent	Unnamed tributary to West Branch Delaware River	Class C

Wetland and stream impacts for Project construction will only occur within a limit of disturbance (LOD) within the Project Site, shown on Figure 14. All features within the LOD that may be impacted during the Project have been delineated and are discussed below.

Construction, operation, or maintenance of the Project will avoid wetland and stream impacts to the extent possible. Temporary timber mat access roads will be placed in some wetlands to avoid any permanent impacts. Due to the hilly terrain in this location, some temporary and permanent grading impacts to wetlands are anticipated to accommodate temporary access roads and work pads for structures. See Table 8 for wetland impacts and the associated Project components and Lines. A temporary timber mat air bridge will be placed outside of the top of bank of Stream 112, a Class C(T) Stream, to avoid impacts. The other streams will be avoided entirely. Therefore, no stream impacts are anticipated as a result of the Project.

Table 8. Wetland Impacts

Wetland ID	Associated Project Feature	Coward Classification	Jurisdiction	Permanent Wetland Impacts (acres)	Temporary Wetland Impacts (acres)
Wetland 117	Grading for work pad for Line 949	PEM	USACE	0.001	0.000
Wetland 118	Access road and work pad grading for Line 916/917	PEM	USACE	0.017	0.150
Wetland 119	Temporary timber matt access road for Line 916/917	PEM	USACE	0.003	0.000
Wetland 120	Grading for work pad and temporary timber mat access road for Line 917	PEM	USACE	0.017	0.080
Wetland 8	Temporary timber mat access road for Line 949/916	PSS	USACE	0.000	0.390
Wetland 9/16	Temporary timber mat access road for Line 949/916	PSS	USACE	0.000	0.240
Wetland 11	Temporary timber matt access road for Line 949/919 laydown yard	PEM	USACE	0.000	0.050
Wetland 12	ROW Clearing for Line 919/949	PFO	USACE	0.032	0.000
Wetland 14	Temporary timber matt access road for Line 949 Structure Removal	PEM	USACE	0.000	0.090
Total				**0.070**	**1.000**

Erosion and sediment controls will be utilized in accordance with the New York State Standards and Specifications for Erosion and Sediment Control. Best Management Practices (BMPs) are outlined in the two separate Project Storm Water Pollution Prevention Plans (SWPPPs). Fraser Reroutes SWPPP addresses reroutes and removals of Line 919, Line 949, and portions of reroutes of Lines 916 and 917 and Tap Line 951. The Delhi Reroutes SWPPP addresses portions of existing Line 916, proposed Line 916/existing Line 949, and proposed Line 917/existing Line 919. Coverage under the State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity – GP-0-20-001 (or updated version) will be

obtained from NYSDEC for the Delhi-area portion of the reroutes (portions of all Lines will be rerouted or removed in this portion of the Project Site). An application is being prepared for coverage under a NYSDEC Individual SPDES Permit for "New and Existing Industrial Facilities" for the Fraser-area portion of the reroutes (portions of all Lines will be rerouted or removed in this portion of the Project Site), as slopes exceeding 25 percent cause it to be ineligible for coverage under the General Permit. Temporary and Permanent impact to surface waters or wetlands will be avoided or minimized to the greatest extent possible for the Project Site.

3.1.2 Floodplains

According to the Federal Emergency Management Agency (FEMA), a Special Flood Hazard Area (previously known as the 100-year floodplain) is defined as an area that will be inundated by a flood event having a one percent chance of being equaled or exceeded in any given year. FEMA's Flood Insurance Rate Map (FIRM) for the Towns of Hamden and Delhi (effective June 16, 2016) was consulted to determine the location of floodplains in relation to the Project Site (See Appendix A, Figure 15: FEMA Flood Zones). One segmented Delhi portion of the Project Site is located within a FEMA Special Flood Hazard Regulatory Floodway and 100-Year Flood Zone associated with the West Branch Delaware River. A temporary access road and stabilized construction entrance is proposed outside of all FEMA Special Flood Hazard Areas. Temporary impacts within floodplain resources are anticipated as a result of timber mat access roads and temporary work pads. However, these actions will not obstruct flood flows, there will be no increase in flood elevation, and impacted areas will be restored to pre-construction conditions and topography.

3.2 Vegetative/Ecological Communities

The Project Site is primarily composed of maintained ROW containing open pastureland and successional shrubland. The primary area of proposed ROW is composed of northern successional hardwood forest, including a distinct red pine plantation.

<u>Lines 916 and 917</u>

Approximately 8.3 cumulative acres of clearing is proposed east of the substation to accommodate the reroutes of Lines 916 and 917.

Lines 919 and 949

Approximately 13.5 cumulative acres of tree clearing is proposed west of the Fraser Substation to accommodate the reroutes of Lines 919 and 949.

Lines 919, 949, 916, and 917 (Overall Project Site)

An additional approximate 1.9 acres of spot-clearing and successional shrubland management in support of new ROW for these four Lines is proposed. All proposed vegetation clearing is shown on Appendix A, Figure 3: Aerial Location. After project completion, areas of mowed lawn within the ROW will be maintained in perpetuity per industry standards for vegetation management. Some ground disturbance may be associated with tree removal in upland areas but no grubbing of stumps in the ground is proposed. Special considerations will be taken in forested wetland habitats to minimize or completely avoid any ground disturbance and permanent impacts.

The wetland communities located within the Project Site are discussed in Section 3.1. After Project completion, areas of mowed lawn will be maintained in perpetuity per NYSEG's current approved vegetation management plan and will likely revert to successional old field. Impacts to vegetation will be further minimized during construction through adherence to BMPs and sediment and erosion control measures found in the SWPPP.

3.3 Rare, Threatened and Endangered Species

Information regarding the occurrence of rare, threatened, and endangered species and significant natural communities for the Project Site was obtained from the NYSDEC and USFWS websites. Copies of this information are included in Appendix D: Agency Correspondence.

3.3.1 State-Listed Species

At the direction of the New York Natural Heritage Program (NYNHP), the NYSDEC Environmental Resource Mapper (ERM) (online service) was consulted on February 9, 2020 for information regarding listed species and unique or significant natural communities prior to direct consultation with the NYNHP.

Line 917

According to the ERM, the location of the Project Site where Structures 102, 103, and 435A are proposed for Line 917 are flagged to be in the vicinity of the New York State Unlisted comely shiner (*Notropis amoenus*). However, no in-stream work is proposed in this location and, as such, no impacts to the comely shiner are anticipated.

No other State-listed species are flagged to be potentially within the Project Site and therefore, the Project is not anticipated to impact any State-listed species.

3.3.2 Federally-Listed Species

An official letter was generated from USFWS's Information for Planning and Conservation (IPaC) system on February 9, 2021. The IPaC letter indicates there are no records of potential presence of federally-listed species within the Project Site (See Appendix D: Agency Correspondence).

3.4 Land Use and Zoning

Current land use codes for the Project Site and all Project Lines include: Rural Residential (240), Vacant Rural (323), Residential Vacant Land Over 10 Acres (322), Residential Vacant Land (311), Seasonal Residences (260), Vacant Farmland (105), Abandoned Agriculture (321), College/University (613), Electrical Substation (872), Electrical Transmission Improvement (882), and Electric and Gas (870). The Project Site is located within a Town of Delhi Residential, Residential and/or Commercial Zoning District near the Delhi Substation, as well as a Village of Delhi Agricultural/Residential Zoning District. The Town and Village of Delhi do not have applicable zoning ordinances.

3.5 Agricultural Land

All Project Lines

According to the New York State Agricultural Districts Mapping Program, the Project Site is located within the Delaware County Agricultural District Number 2, established in accordance with Article 25-AA of the Agriculture and Markets Law (See Appendix A, Figure 16: NYS Agricultural Districts). A review of land use within the Project Site revealed that new ROW is proposed within an active pasture for new portions of Lines 919, 949, 916 and 917 and Tap Line

951; however, no structures are proposed within the pasture. No significant impacts to agricultural resources have been identified.

3.6 Historic Structures or Registered, Eligible or Inventoried Archaeological Sites

A review of the State Historic Preservation Office (SHPO) Cultural Resource Information System (CRIS) Mapper indicated that the Project Site is located within an archeologically sensitive area near the Delhi Substation reroutes and at locations near the Fraser Substation.

All Project Lines – Fraser Substation Reroutes

Correspondence depicting the Project Site and scope of work regarding Fraser Substation and reroutes/removals for all Project Lines around Fraser Substation was submitted to SHPO for review via CRIS. In a letter dated April 15, 2021, SHPO indicated that the reroutes and removals for all Project Lines to Fraser Substation will have no impact on archaeological and/or historic properties and resources listed in or eligible for the New York State and National Registers of Historic Places (See Appendix D: Agency Correspondence).

All Project Lines- Delhi Substation Reroutes

The Project Site included the Delhi Substation reroutes is also located within an archeologically sensitive area and near two historic districts in the Town of Delhi. SHPO requested a viewshed analysis regarding the new structures to be installed for these Project Lines. In a letter dated June 28, 2021, SHPO stated that the reroutes near Delhi Substation will have no adverse impact on historic or archaeological resources.

3.7 Permits and Consultations

A number of local, State, and Federal permits and agency consultations are needed for the Project (See Table 9). Permits, approvals, and consultations could be required from/with the USACE, USFWS, SHPO, NYSDEC, New York City Department of Environmental Protection (NYCDEP), Delaware County, and Town of Delhi.

Table 9. Permits and Consultations

Permit/Consultation	Associated Line/s	Administering Agency	Status
Federal			
Nationwide Permit 57	All Lines	USACE	Self-Authorized
Federal Rare Plants & Animals – Consultation	All Lines	USFWS	Obtained February 9, 2020
State			
16 NYCRR Part 102	All Lines	PSC	This Report
Historic & Cultural Resources – No Effect Letter	All Lines	SHPO	Obtained June 28, 2021
State Rare Plants & Animals – Website Consultation	All Lines	NYSDEC ERM	Obtained February 9, 2021
State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity (GP-0-20-001) and SWPPP Review [Delhi Portion]	All Lines	NYSDEC	Submitted October 2021
SPDES Individual Permit and SWPPP Review [Fraser Portion]	All Lines	NYSDEC	Submitted October 2021
SWPPP Review & Approval	All Lines	NYCDEP	Submitted October 2021
County			
239-m Site Plan Referral under General Municipal Law	All Lines	Delaware County Planning	Reviewed during Town's Site Plan review
Local			
Site Plan Approval & Special Permit, including SEQR, for OSAIP.	All Lines	Town of Delhi	Overall OSAIP approved June 2020
Road Crossing Permit	Lines 949, 916 and 917	Town of Delhi	To be submitted prior to construction

4.0 REFERENCES

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