



MINOR MODIFICATION PACKAGE

Matter No. 21-00982

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GREENS CORNERS SOLAR PARK

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Acronym List

<u>Acronym</u>	<u>Definition</u>
Application	Section 94-c Application
CRAMMP	Cultural Resource Avoidance, Minimization, and Mitigation Plan
CO2	Carbon Dioxide
CWA	Clean Water Act
DMM	Document Matter Master
EMF	Electric and Magnetic Field
FAA	Federal Air Administration
Facility	Green Corners Solar Park
kV	Kilovolt
LOD	Limit of Disturbance
MSG	Mineral Soil Group
MVA	Megavolt Amperes
NCBP	Net Conservation Benefit
NLCD	National Land Cover Data
NYISO	New York Independent System Operator
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
NYSDOT	New York State Department of Transportation
OPRHP	New York State Office of Parks, Recreation, and Historic Preservation
ORES	Office of Renewable Energy Siting
Package	Minor Modification Package
PEJA	Potential Environmental Justice Areas
Permit Holder	Green Corners Solar, LLC
Permitted Facility	Facility approved per Siting Permit dated September 22, 2022
PILOT	Payment in Lieu of Taxes
PNIA	Pre-Construction Noise Impact Assessment
POI	Point of Interconnection
Proposed Facility	Facility proposed in this Minor Modification
PV	Photovoltaic
ROW	Right of Way
RUA	Road Use Agreement
SHPO	State Historic Preservation Office
SIS	System Impact Study
SPCC	Spill Prevention, Control, and Countermeasure

<u>Acronym</u>	<u>Definition</u>
SPDES	State Pollutant Discharge Elimination System
SRIS	System Reliability Impact Study
SWPPP	Stormwater Pollution Prevention Plan
USACE	United States Army Corps of Engineers
USFWS	United State Fish and Wildlife Service
VSA	Visual Study Area
WOTUS	Waters of the United States
WRMP	Wetland Restoration and Mitigation Plan
Wp	Watt-peak

1.0 Introduction

Greens Corners Solar, LLC (Greens Corners or the Permit Holder) applied for a Major Renewable Energy Facility Siting Permit pursuant to Section 94-c of the New York Executive Law to develop, design, construct, operate, maintain, and decommission the Greens Corners Solar (Facility). Greens Corners Solar is permitted as a 120 megawatt (MW) photovoltaic (PV) solar generating facility proposed in the Towns of Hounsfield and Watertown, Jefferson County, New York.

On September 22, 2022, in accordance with the requirements of Section 94-c of the Executive Law, Greens Corners received its Siting Permit for a Major Renewable Energy Facility (Siting Permit) from the State of New York Office of Renewable Energy Siting (ORES) under Matter No. 21-00982.

This Minor Modification request details the proposed minor modifications and substantive reductions in the Facility size resulting from the modification. This Minor Modification provides a detailed description of changes to each exhibit, if any, of the Facility's Section 94-c Application (Application) and Application Supplements (Supplements), prepared and submitted in 2021 and 2022 to ORES, and includes analysis, supporting figures and appendices, where potential changes in environmental impacts from the Permitted Facility have been evaluated. The proposed minor modifications within the Permitted Facility LOD are not anticipated to result in any material increase in any previously identified adverse environmental affects or result in any significant adverse environmental affects not previously addressed by uniform or site-specific standards or conditions. Therefore, the Permit Holder requests that ORES determine the modification is "minor".

Green Corners hereby submits this Minor Modification request seeking ORES's approval of a modification of the Siting Permit due to an increase in the generating capacity of the Facility from 120 MW to 140 MW and design optimizations enabling a significant reduction in the overall limit of disturbance (LOD) for the Facility from approximately 1,177 acres to 799 acres. The Proposed Facility is completely within the Permitted Facility LOD.

The increase in generation capacity is being initiated due to improved PV module efficiency, (meaning more MWs can be generated with fewer modules), material economies of scale and development synergies that can be realized through combining the megawatts from a separate 20 MW project located along the same National Grid transmission line, and available space within the Permitted Facility LOD. The interconnection process for confirming this increase will not result in a New York Independent System Operator (NYISO) determination of a "material modification" and is described further below under the Exhibit 21 description. It is the Permit Holder's understanding that National Grid and NYISO support the change from an interconnection perspective. An additional transformer is included in the Proposed Facility, co-located at the substation, to accommodate this increase in generating capacity. Potential sound impacts have been evaluated and are described in the Exhibit 7 description below. In addition, the nearest non-participating residence identified in the Permitted Facility is now participating, which enabled the point-of-interconnection (POI) substation to be re-located approximately 700 feet north of the Permitted Facility location (within the Permitted Facility LOD). The updated sound evaluation demonstrates that the Proposed Facility complies with the Section 94-c noise thresholds. Refer to Section 2.0 for a detailed analysis on the minor modification and the potential impacts to the Application exhibits and supplements.

The design optimizations are primarily due to upgrading the PV modules from a 350 Watt-peak (Wp) model to a 605 Wp model. This change reduced the total number of PV modules needed to achieve the generating capacity, which had a cascading effect of reducing the number of discrete solar array areas required, reducing the number of inverters, and reducing the overall quantity of roads, collector lines, and perimeter fencing.

As further detailed below, the proposed minor modifications will result in a reduction of impacts to terrestrial ecology, occupied habitat, and Mineral Soil Group (1-4) soils due to the reduced LOD. The proposed minor modifications will also not result in any changes to potential impacts related to noise, visuals, cultural resources, or wetlands and water resources, and will provide an increase in CO₂ displacement of approximately 20,717 tons.

Permitted Facility

The Permitted Facility was authorized as a proposed 120 MW solar energy generating facility. The Facility includes commercial-scale solar arrays, access roads, buried electric collection lines, and electrical interconnection facilities. The proposed collection substation and interconnection facilities will be on land within the Facility, connecting into and near National Grid's existing Coffeen–West Adams 115 kilovolt (kV) transmission line. The LOD for the Permitted Facility encompasses approximately 1,177 acres, with approximately 38.3 acres of tree clearing. Components of the Permitted Facility, as presented in the Permit Holder's Application and Supplements, are detailed below.

Solar Array: The Permitted Facility includes 509,652 PV modules spanning 273.9 acres within the Facility Area. The PV modules have a proposed maximum height of 15 feet above the ground surface. The Permitted Facility specified the use of Canadian Solar CS3U-350PB-AG Tracker PV modules with a nameplate generating capacity of 350 Wp.

Racking System: The PV modules for the Permitted Facility are proposed to be mounted on Nextracker NX Gemini Tracker 2P single axis tracker racking systems. The PV module racking systems will be pitched to 42.195 feet apart, resulting in an approximate ground coverage of 33 percent.

Perimeter Fencing: The Permitted Facility is proposed to be enclosed within 8.5-foot-tall chain link fencing. Barbed wire is proposed along the top of the chain link fencing enclosing the collection substation and POI switchyard. Approximately 125,136 feet (23.7 miles) of chain link fencing is proposed for the Permitted Facility. In addition, 24-foot-wide gates are proposed at access road entry points throughout the Facility.

Inverters: The Permitted Facility includes 44 inverters within the Facility Site. The inverters will be placed on concrete pads or pile driven foundations. The inverters will convert the solar energy collected from the PV modules from alternating current (AC) to direct current (DC) and will transfer the power to the collection system. The inverters for the Permitted Facility are SMA Sunny Central MVPS 4600-52-US with a nameplate capacity of 4.14 MW/4.6 megavolt ampere (MVA).

Collection System: The Permitted Facility contains approximately 12.2 miles of electric collection lines throughout the Facility Site. The collection lines transfer the electric power from the inverters to the collection substation. A majority of the electric collection lines will be installed underground via direct bury except where sensitive resources are crossed, in which case, horizontal directional

drilling (HDD) methods will be employed. Approximately 2,543.8 feet of overhead electric collection lines are proposed along Old Rome Road and 4,411.8 feet are proposed along Martin Road.

Collection Substation and POI Switchyard: The Permitted Facility's collection substation and POI switchyard will interconnect with National Grid's existing Coffeen–West Adams 115 kV transmission line. The substation and switchyard are located approximately 1,095 feet south of Beutel Road.

Access Roads: The Permitted Facility includes 20 access roads through the Facility Site, spanning approximately 7.55 miles. The access roads are 20 feet wide and constructed as the New York State Department of Environmental Conservation (NYSDEC) approved previous access road.

Laydown Areas: The Permitted Facility included one 7.71-acre temporary laydown area along Old Rome Road. The laydown yard will be used to store construction equipment, Facility components, and will serve as a parking area for construction personnel. The construction trailer will be located within the laydown area for the duration of construction. Nearing the completion of construction, the laydown area will be removed and converted to a solar array and the ground will be restored to a meadow condition.

Proposed Facility

The Proposed Facility, as detailed in this Minor Modification request, will add 20 MW of solar energy generation, increasing the Facility's generating capacity to 140 MW. The LOD for the Proposed Facility encompasses approximately 799 acres, resulting in an overall LOD reduction of 378 acres. The Proposed Facility components are detailed below. Figure 1 of this minor modification depicts the changes between the Permitted Facility and the Proposed Facility.

Solar Array: For the Proposed Facility, the solar arrays have been fully removed from the following locations:

- Array Area A – north of Arsenal Street
- Array Area B – north of Fields Road and west of Slater Road
- Array Area C – north of Fields Road and east of Slater Road
- Array Area D – west of Jericho Road
- Array Area E – east of Lloyd Road
- Array Area F – north of Massey Street Road
- Array Area G – east of Old Rome Road
- Array Area H – northeast of Old Rome Road
 - Note: This array area is for the removal of the solar arrays and portions of the Permitted Facility LOD only. The laydown yard and collection lines will remain as previously permitted.

Refer to Figure 1 of this minor modification for the Array Area locations referenced above.

The Proposed Facility will have 317,392 PV modules and will encompass an area of approximately 222.8 acres within the proposed LOD. The PV modules for the Proposed Facility are Trina Solar TSM-605NEG19RC.20 Trackers, which have a nameplate generating capacity of

605 Wp (an increase of 255 Wp from the Permitted Facility). The PV modules would be maintained at a maximum height of 15 feet above the ground surface. This height is consistent with the local laws for the Town of Hounsfield and the same as the height proposed for the Permitted Facility. Technical specifications for the Proposed Facility PV modules and racking are provided in Appendix A.

Racking System: The PV modules for the Proposed Facility will be mounted on FTC Solar 2P Voyager single axis tracker racking systems.

Perimeter Fencing: The Proposed Facility will use 8-foot-tall agricultural fencing around the perimeter of the Proposed Facility. The total amount of perimeter fencing required will be reduced to 70,088 feet (13.3 miles) due to a reduction in the Facility footprint. The fencing around the proposed substation would be 7-foot-tall chain link fencing topped with one foot of barbed wire.

Inverters: The Proposed Facility will reduce the total number of inverters to 37, resulting in an overall reduction of seven inverters. The inverters for the Proposed Facility will remain the SMA Sunny Central MVPS 4600-52-US with a nameplate capacity of 4.14 MW/4.6 MVA and will be placed on concrete pads or pile driven foundations.

Collection System: The Proposed Facility contains approximately 7.4 miles of electrical collection lines. This is a reduction of approximately 25,040 feet (4.7 miles). Due to the removal of PV modules west of Jericho Road (Array Area D on Figure 1), the overhead collection line along Martin Road is no longer required and has been removed for the Proposed Facility. The methods of collection line installation will remain the same.

Collection Substation and POI Switchyard: The collection substation will be located approximately 395 feet south of Beutel Road and 700 feet north of the location identified for the Permitted Facility but within the same parcel as the Permitted Facility and within the Permitted LOD. The Proposed Facility will still interconnect to the National Grid Coffeen–West Adams 115 kV transmission line as identified for the Permitted Facility. The location of the substation, directly adjacent to the National Grid right-of-way (ROW), is shown on Sheet 10 in Appendix B: Updated Design Drawings. The detailed substation design inside the substation fence is shown in Appendix C: Updated Substation Layout and Lighting Plan.

In general, the Proposed Facility has two main power transformers, rather than one as originally proposed. The proposed transformer ratings are 78/104/130 MVA, 115-34.5 kV and 15/20/25 MVA, 115-34.5 kV. The primary voltage side of these transformers will each be connected to one new motorized 115 kV disconnect switch. The motorized disconnect switches will be used to isolate one transformer for maintenance purposes. The two new motorized switches will be connected to one circuit breaker as in the initial 120 MW substation design.

34.5 kV feeders, consisting of one circuit breaker and two manual disconnect switches, will connect the medium voltage collector circuit cables to the two main power transformers using two separated and isolated 34.5 kV overhead bus bars. The initial 120 MW design had six single circuit feeders for one main power transformer. The Proposed Facility substation will have three double circuit 34.5 kV feeders for the 78/104/130 MVA transformer and one single circuit for the 15/20/25 MVA transformer, for a total of four 34.5 kV feeders.

The Proposed Facility will share a common control building powered by two station service transformers installed on the 34.5 kV overhead bus bar. The Proposed Facility will also require a grounding transformer and will have a provision for a 34.5 kV capacitor bank.

The additional 15/20/25 MVA main power transformer and related equipment will reduce the substation area from 62,500 ft² to 46,465 ft². The reduction in square footage despite adding a transformer is due to the Proposed Facility substation design being more compact and efficient.

Access Roads: The Proposed Facility will have approximately 26,423 feet (5.00 miles) of access roads, resulting in an overall reduction of approximately 13,470 feet (2.55 miles) of access roads. Access roads have been removed from solar array areas proposed to be removed from the Facility. The access roads will be constructed as pervious access roads and will be 20 feet wide.

Laydown Areas: The laydown area footprint and material composition proposed for the Permitted Facility will not change for the Proposed Facility. For the Proposed Facility, the laydown area will be fully restored to the pre-construction condition following the completion of construction.

Table 1 below summarizes the modifications detailed herein and illustrates the changes between the Permitted Facility and the Proposed Facility. Green Corners is also requesting the name of the Permitted Facility be changed from Green Corners Solar to the Green Corners Solar Park for the Proposed Facility.

Table 1 – Permitted Facility and Proposed Facility Comparison

Facility Component/Feature	Permitted Facility	Proposed Facility
Facility Capacity	120 MW	140 MW
Limit of Disturbance (LOD)	1,177 acres	799 acres
Tree Clearing Acreage	38.3 acres	24.5 acres
Area of PV Modules	273.9 acres	222.8 acres
Number of PV Modules	509,652	317,392
Maximum PV Module Height	15 feet	15 feet
PV Module Manufacturer and Model	Canadian Solar CS3U-350PB-AG Tracker	Trina Solar TSM-605NEG19RC.20 Tracker
PV Module Nameplate Capacity	350 Watt-peak	605 Watt-peak
PV Module Pitch	42.195 feet	38.858 feet
Racking System Manufacturer and Model	Nextracker NX Gemini Tracker 2P	FTC Solar 2P Voyager
PV Module Ground Coverage Ratio	33%	40%
Number of Inverters	44	37
Inverter Manufacturer and Model	SMA Sunny Central MVPS 4600-52-US	SMA Sunny Central MVPS 4600-52-US
Inverter Nameplate Capacity	4.14 MW/4.6 MVA	4.14 MW/4.6 MVA
Number of Access Roads	20	12

Facility Component/Feature	Permitted Facility	Proposed Facility
Total Length of Access Roads	39,893 feet (7.55 miles)	26,423 feet (5.00 miles)
Width of Access Roads	20 feet	20 feet
Access Road Material	Pervious Stone	Pervious Stone
Area of Laydown Yard	7.71 acres	7.71 acres
Height of Perimeter Fencing	8.5 feet	8 feet
Substation Area	62,500 ft ² (1.43 acres)	46,465 ft ² (1.07 acres)
Height of Substation Fencing	8.5-foot-tall fencing	7-foot-tall fencing with 1-foot of barbed wire
Total Length of Perimeter Fencing	125,136 feet (23.7 miles)	70,088 feet (13.3 miles)
Type of Perimeter Fencing	Chain Link	Agricultural Fencing, Chain Link at Substation
Total Length of Collection Lines	64,207 feet (12.2 miles)	39,166 feet (7.4 miles)
Length of Overhead Collection along Martin Road	4,411.8 feet (0.84 miles)	0 feet
Length of Overhead Collection along Old Rome Road	2,543.8 feet (0.48 miles)	2,543.8 feet (0.48 miles)
CO ₂ Displacement	46,300 tons	67,017 tons
Acreage of Occupied Habitat within LOD	569 acres	423 acres
State-regulated Wetlands Impacts	0.764 acres	0.764 acres
State-regulated Wetlands Buffer Impacts	1.399 acres	1.399 acres

2.0 Application Exhibit Modifications

The Permit Holder has reviewed the Application and Supplements to identify impacts resulting from this minor modification. The following subsections detail the modifications to each Application Exhibit of the Permitted Facility.

Exhibit 1: General Requirements

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the information presented within Exhibit 1 – General Requirements of the Application, except for changing the generating capacity of the Facility from 120 MW to 140 MW.

Exhibit 2: Overview and Public Involvement

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 2 - Overview and Public Involvement.

Boralex held a virtual meeting with Beth Arthur, the Town of Hounsfield Town Supervisor on January 22, 2024 to discuss the minor modification for the Proposed Facility. Boralex discussed the increase in megawatts, the reduction in LOD, the understanding that Payment in Lieu of Taxes (PILOT) payments will increase, that this does not require new waivers to be asked of the Town, and the new construction season proposed to start in Q1 2025. The Town Supervisor did not have any concerns with this information and found that LOD reduction was favorable to the public and Town. A copy of email correspondence confirming this information is provided as Appendix D.

Boralex held a conference call with Joel Bartlett, the Town of Watertown Town Supervisor, and Pamela Desormo, Town of Watertown Town Clerk, on January 23, 2024 to discuss the minor modification for the Proposed Facility. Boralex discussed the increase in megawatts, the reduction in LOD, the understanding that PILOT payments will increase, that this does not require new waivers to be asked of the Town, and the new construction season proposed to start in Q1 2025. The Town Supervisor and Town Clerk did not have any concerns with this information and found that LOD reduction was favorable to the public and Town. A copy of email correspondence confirming this information is provided as Appendix E.

Exhibit 3: Location of Facilities and Surrounding Land Use

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 3 – Location of Facilities and Surrounding Land Use.

The Proposed Facility components will remain within the Permitted Facility LOD; therefore, existing and proposed land uses, zoning districts, comprehensive plans, existing overhead and underground facilities, specially designated areas, and recreational resources will remain unchanged. Figure 1 of this minor modification depicts the changes between the Permitted Facility and the Proposed Facility layouts including locations of the Proposed Facility components, the Permitted Facility components to be removed, and the reductions in LOD and tree clearing. Figure 2-2 of this minor modification depicts the Proposed Facility layout.

Due to the reduction in the overall Facility LOD and the reduction in required tree clearing as outlined in this minor modification, impacts to surrounding land use will be reduced overall. The Permit Holder will continue to consult with the Towns, landowners, and local utility providers throughout the development of the Facility.

Exhibit 4: Real Property

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 4 – Real Property.

The Proposed Facility LOD has been reduced from the Permitted Facility; therefore, some parcels are no longer hosting Facility components. Apart from removing components from parcels, changes have also been made to real property parcels 82.00-3-56.2, 90.07-1-32, and 82.00-3-57.2. Refer to Figure 4-1 of this minor modification for the location of these changes.

The Young property (82.00-3-56.2) has been subdivided into three parcels, see Figure 4-3 for a survey of this subdivision, which shows the subdivided areas labeled as Areas 1, 2, and 3. Area 1 encompasses the largest portion plus two smaller areas north of Fields Road. These areas included components in the Permitted Facility; only the large portion south of Fields Road contains

components in the Proposed Facility. Areas 2 and 3 did not contain components in the Permitted Facility and do not contain components in the Proposed Facility. The entirety of the Young property was a participating parcel in the Permitted Facility and all subdivided portions of the parcel continue to be participating in the Proposed Facility. Therefore, the permitted setbacks are the same as the Proposed Facility setbacks, and, following the subdivision of the Young property, the Proposed Facility remains in compliance with all substantive local laws.

The 90.07-1-32 at 20192 Beutel Road property was previously owned by Rebecca Storings and was not a participating parcel. The 90.07-1-32 property has been purchased by Greens Corners Solar, LLC and is now a participating parcel. No components were sited on this parcel in the Permitted Facility and no components are sited on this parcel in the Proposed Facility. Setbacks at this parcel will remain as they were proposed in the Permitted Facility application; therefore, the Proposed Facility remains in compliance with all substantive local laws.

The Wilton property (82.00-3-57.2) was incorrectly included as being part of the Permitted Facility in a withdrawn Limited Notice to Proceed Pre-Construction Compliance Filing. This property has never been included in the Facility Area and continues to be excluded from the Proposed Facility.

A table comparing the parcels included in the Permitted Facility to parcels in the Proposed Facility is provided below to depict the changes described above. A copy of all participating landowner agreements for the Proposed Facility is provided as Appendix F.

Table 2 – Facility Parcel Information

Parcel Tax ID	Parcel Owner	Facility Components	Participating in Permitted Facility	Participating in Proposed Facility
82.00-2-8	Robbins Land Trust	Collector Line	Yes	Yes
82.00-3-15.1	Robbins Land Trust	None	Yes	No
82.00-3-49.1	Robbins Land Trust	Generator	Yes	Yes
82.00-3-50	Robbins Land Trust	Generator	Yes	Yes
82.00-3-53	Robbins Land Trust	Collector Line	Yes	Yes
82.00-3-54	Robbins Land Trust	Generator	Yes	Yes
82.00-3-56.2	Young, Jason	Generator	Yes	Yes
82.00-3-57.1	Wilton, Kenneth & Michelle	Generator	Yes	Yes
82.00-3-57.2	Wilton, Kenneth & Michelle	None	No	No
82.00-3-59.1	Cary L Riordan	None	Yes	No
82.00-3-61.21	Crystal Pond Properties LLC	None	Yes	No
82.00-3-65	TI Ag Park LLC	None	Yes	No
90.00-4-10	Francis R Hogan Jr	Generator	Yes	No
90.00-4-3.1	Francis R Hogan Jr	Generator	Yes	No
90.00-4-9	Timothy R Harvey & Stuart Harvey	None	Yes	No
90.00-5-10	Spaziani, Silverio Jr. & Morgia, Caltaldo	Collector Line	Yes	Yes

90.00-5-13.1	Robbins Land Trust	Collector Line	Yes	Yes
90.00-5-18.1	Robbins Land Trust	Generator	Yes	Yes
90.00-5-19.21	Collins, James A. & Sandra B.	Generator	Yes	Yes
90.00-5-20.2	Robbins Ronald C	Generator	Yes	Yes
90.00-6-2	Robbins Land Trust	Generator	Yes	Yes
90.00-6-6	Robbins Land Trust	Generator	Yes	Yes
90.00-6-8.2	Robbins Ronald C	Generator	Yes	Yes
90.00-6-9.331	Roach, Hugh V. Jr. & Katherin G.	Generator	Yes	Yes
90.07-1-14	Clark, Donald E. & Atchue, Sally J.	Generator	Yes	Yes
90.07-1-17	Robbins Land Trust	Generator	Yes	Yes
90.07-1-29.2	Russell B and Ruth M Greenwood Trustee	None	Yes	No
90.07-1-32	Greens Corners Solar LLC	None	No	Yes

Exhibit 5: Design Drawings

The minor modifications proposed by the Permit Holder for the Proposed Facility will result in a reduction in impacts presented in Exhibit 5 – Design Drawings.

The Proposed Facility will provide an additional 20 MW of solar electric generation, while remaining within, and reducing the overall LOD. The consolidation of the site design is outlined within the Updated Design Drawings provided in Appendix B. Along with reducing the overall LOD, the Proposed Facility results in a decrease to the required area of tree clearing, number of PV modules and inverters, and the overall lengths of the perimeter fencing, collection lines, and access roads.

The Updated Design Drawings were prepared using computer software (i.e. AutoCAD) under the direction of a professional engineer who is licensed and registered in New York State and employed at ANS Geo. The Proposed Facility has been designed to adhere to all previously defined setback requirements, with a summary of the setback requirements for the Towns of Hounsfield and Watertown provided on Sheet 2 of the drawings. The PV modules would be maintained at a maximum height of 15 feet above the ground surface and the finished grade.

The Updated Design Drawings constitute the Site Plan for the Facility and have been prepared at commonly used engineering scales, which are reported on the drawings. All details shown within the Updated Design Drawings were derived from the originally permitted design. As required, these drawings depict all Facility components and features, including the following:

1. PV modules, inverters, low-medium transformers, property lines, and applicable setbacks;
2. Extents of proposed access road travel lanes (including indications of any existing access roads to be utilized);
3. Electric cable collection line corridors (including an indication of permanent rights-of-way (ROW)) and the approximate locations of any proposed splice vaults; overhead and underground cable routes are differentiated; mapping identifies any locations of proposed

trenchless collection line installations, including the approximate lengths of such electric line routes;

4. The existing electric transmission line (which the Facility will interconnect to) and any known existing utilities (including pipelines) and associated ROWs within the Facility site;
5. Approximate LOD for all Facility components (PV modules, access roads, electric line corridors, etc.);
6. Approximate tree clearing limits for all Facility components (PV modules, access roads, buildings, electric lines, shading vegetation, etc.);
7. Extents of collection and interconnection stations and any applicable local setbacks;
8. Energy storage system(s) are not proposed for the Facility;
9. Site security features including the approximate location of perimeter fencing; and,
10. Any berms, retaining walls, fences and other landscaping improvements.

Exhibit 6: Public Health, Safety, and Security

The minor modifications proposed by the Permit Holder for the Proposed Facility will result in a reduction in impacts presented in Exhibit 6 – Public Health, Safety, and Security.

The Proposed Facility will provide an additional 20 MW of solar electric generation, increasing the renewable energy generation capacity for New York State. The Proposed Facility will also provide a reduction in greenhouse gas emissions and approximately 20,717 tons of additional carbon dioxide (CO₂) displacement (totaling to 67,017 tons of CO₂).

Solid, liquid, and gaseous waste produced during construction of the Facility will be similar to the Permitted Facility with waste primarily produced from construction packaging, scrap, general refuse, and sanitary waste. Vegetation clearing will also result in solid waste disposal from logs, chipped woody vegetation, and stumps. Tree clearing for the Proposed Facility will be reduced from 38.3 acres to 24.5 acres resulting in a reduction of solid waste produced during construction.

The use and storage of chemicals at the Proposed Facility will be the same means and methods as previously stated in the Application.

The Facility's approved Safety Response Plan and Site Security Plan will be implemented for construction and operation. Figure 2 (Safety Response Plan Updated Site Plan) included in this minor modification has been updated to reflect the Proposed Facility layout. Training for emergency responders will be held prior to construction as described in Exhibit 6 of the Application. The Permit Holder will also provide a final Site Security Plan prior to Facility operation in accordance with §900-2.10(b) The Permit Holder will also provide a final Site Security Plan prior to Facility operation in accordance with §900-2.10(b) The Permit Holder will also provide a final Site Security Plan prior to Facility operation in accordance with §900-2.10(b) The Permit Holder will also provide a final Site Security Plan prior to Facility operation in accordance with §900-2.10(b)

Exhibit 7: Noise and Vibration

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 7 – Noise and Vibration.

The primary change comparing the 2021 and 2024 Pre-Construction Noise Impact Assessments (PNIAs) for the Facility is the addition of a 25 MVA transformer to the collector substation to accommodate the increased nameplate capacity. The additional transformer has a fans on sound power of 93 dBA, 6 dB lower than the collector transformer. The substation has also been shifted to the north, closer to Beutel Road. Eight array areas have been removed as detailed in Section 1.0 above. Some inverter locations have been shifted and a total of seven inverters have been removed. A total of 37 inverter locations were modeled for the 2024 PNIA. Other than the additional transformer, all equipment types are the same as the 2021 PNIA.

The Facility was modeled with the same parameters and same sound emissions for equipment. The exception is an added small collector transformer. Some modeled source heights were modified slightly (approximately 0.5 meters) to account for actual equipment dimensions.

Modeling results show that sound levels at all participating and non-participating receptors, along with property line locations, meet the Section 94-c regulation limits. Compared to the 2021 PNIA, average non-participating residence sound levels declined by 2 dB and the maximum non-participating residence daytime and nighttime sound levels declined by 1 dB and increased by 1 dB, respectively. The updated PNIA for the Proposed Facility is provided in Appendix G of this minor modification.

Exhibit 8: Visual Impacts

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 8 – Visual Impacts.

The Proposed Facility will remove approximately 51.1 acres of PV modules from the Permitted Facility, ultimately reducing the amount of visible PV modules and associated Facility components. As detailed in Section 1.0 above and depicted in Figure 1 of this minor modification, seven array areas have been removed from the Proposed Facility. This reduction in array areas decreased the perimeter fencing limits for the Facility, thereby reducing the overall Visual Study Area (VSA) for the Facility as depicted in Appendix 8-A Figure 8-3: Scenic Resources of the Application. The reduction in solar arrays and fencing removes visual impacts to the neighboring landowners for these array areas. In addition, the perimeter fencing will be reduced in height by six inches and will change from chain link to agricultural fencing around the array areas for the Proposed Facility, further reducing visual impacts.

As detailed in Section 1.0, the spacing between the PV module rows will be reduced for the Proposed Facility and contributes to reducing the overall Facility LOD. The Proposed Facility LOD will remain within the Permitted Facility LOD, therefore the terrain and topography for the Proposed Facility will remain the same as previously analyzed. The proximity of the PV module rows to each other are not anticipated to result in additional visual impacts. In addition, the maximum PV module array height above ground level will be maintained at or below 15 feet as approved for the Permitted Facility.

The substation for the Permitted Facility was proposed to be located approximately 1,095 feet south of Beutel Road and is embedded within the solar arrays with PV modules located on three sides of the substation. Beutel Road is a dead-end road with no occupied residential properties (see the Exhibit 4 description above regarding the Permit Holder's purchase of the parcel on Beutel Road). The Permitted Facility substation encompasses approximately 62,500 square feet

and was enclosed within an 8.5-foot-tall chain link perimeter fencing topped with barbed wire. Landscaping was not provided around the substation for the Permitted Facility since the substation was embedded within the solar arrays.

The substation for the Proposed Facility will be located approximately 700 feet north of the Permitted Facility substation location. The Proposed Facility substation is 46,465 square feet in area, an overall reduction of 25,040 square feet. The Proposed Facility substation will be enclosed by the 7-foot-tall chain link fencing topped with one foot of barbed wire. Due to the relocation of the substation, solar arrays will only be located on the southern and western sides of the substation. The Proposed Facility substation is not located adjacent to residential properties and remains off a dead-end road. The substation for the Proposed Facility is not visible from the roadways adjacent to Beutel Road. Therefore, visual impacts to neighboring properties are not anticipated and the need for landscaping at the proposed substation is not expected.

The Permitted Facility substation viewshed analysis was completed based on the highest substation components; the 65-foot-tall static lightning masts and the 55-foot-tall 34.5 kV POI structures. The viewshed analysis used the highest substation components as a worst-case scenario for visual impacts. Substation components for the Proposed Facility will remain the same or similar in structure and will remain at the same height, therefore visual impacts due to substation component changes will not occur.

The previous Glint and Glare report concluded that there were no glare occurrences at nearby airports, residences, and roadways under worse case conditions of the Permitted Facility. Due to the removal of Array Areas A through H, glare occurrences are anticipated to be reduced for the Facility.

Due to the minor shift in substation location and no additional array areas proposed, visual impacts, including to neighboring landowners and scenic resources, from the Proposed Facility will not change the general conclusions of visibility as stated in Exhibit 8 of the Application

Exhibit 9: Cultural Resources

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 9 – Cultural Resources and generally the Proposed modification will not result in any new or different impacts on cultural, archeological, or historic resources.

The entirety of the Proposed Facility LOD was reviewed for cultural resources as part of the Section 94-c Application and Supplements; refer to the Application Exhibit 9, Appendix 9-C Phase IB for a map of the surveyed areas that cover the entirety of the Proposed Facility components. The new substation and all inverters, access roads, and collector lines will be located within the survey area of the 2021 Phase IB Archaeological Investigation Report (Appendix 9-C) and no archaeological resources were recorded at this location. The proposed substation will be located closer to the historic property at 20192 Beutel Road (parcel ID 90.07-1-32). This parcel was not within the Permitted Facility but is now considered a participating parcel in the Proposed Facility (no components are proposed on this parcel). This historic property was within the original study area for cultural and historic resources for the Facility and changes or modifications to this historic property are not proposed. Therefore, the changes proposed by the Permit Holder as part of this Package will not result in new impacts to cultural resources. The Permit Holder will submit the Proposed Facility changes to the New York State Office of Parks, Recreation and Historic

Preservation (OPRHP) for concurrence and will coordinate with the State Historic Preservation Office (SHPO) for submission of the Cultural Resource Avoidance, Minimization, and Mitigation Plan (CRAMMP).

Exhibit 10: Geology, Seismology and Soils

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 10 – Geology, Seismology, and Soils.

As outlined within Exhibit 10 of the Application, the areas planned for Facility components are relatively flat and open; therefore, the Permit Holder proposes only minor cut and fill for the development of the Proposed Facility as proposed in the Application. Pile driving will be required to support Facility components such as the PV modules and inverters. Due to shallow bedrock identified during geotechnical studies, pre-drilling may be required for post and pile installation. Additional vibrational impacts to neighboring properties due to pile driving or pre-drilling are not anticipated for the Proposed Facility. The Facility components remain within the Permitted Facility LOD and comply with the required setbacks to adjacent properties. Blasting is not anticipated for the Proposed Facility construction, consistent with the Application. Due to the reduction in Facility LOD, there will be a corresponding reduction in potential impacts to soils and geology.

Exhibit 11: Terrestrial Ecology

The minor modifications proposed by the Permit Holder for the Proposed Facility will result in a reduction to impacts presented in Exhibit 11 – Terrestrial Ecology.

The Proposed Facility's LOD has been reduced by 378 acres, when compared to the Permitted Facility LOD. Table 3 below compares the National Land Cover Data (NLCD) for the Permitted Facility and the Proposed Facility.

Table 3 – NLCD Comparison for the Permitted and Proposed Facilities

NLCD Land Cover	Acreage Within LOD		Percentage of LOD		Change in Acreage
	Permitted Facility	Proposed Facility	Permitted Facility	Proposed Facility	
Cultivated Crops	925.92	676.15	78.6%	84.71%	- 249.77
Pasture/Hay	211.78	91.71	18.0%	11.49%	- 120.07
Developed, Open Space	9.62	2.47	0.8%	0.31%	- 7.15
Deciduous Forest	16.12	14.13	1.4%	1.77%	- 1.99
Developed, Low Intensity	2.04	4.11	0.2%	0.51%	+2.07
Woody Wetlands	2.14	1.730	0.2%	0.21%	- 0.44
Emergent Herbaceous Wetlands	3.39	3.16	0.3%	0.40%	- 0.23
Mixed Forest	2.89	2.89	0.2%	0.36%	0.00
Shrub/Scrub	0.73	0.00	0.1%	0.00%	- 0.73
Grassland/Herbaceous	1.34	0.00	0.1%	0.00%	- 1.34

Open Water	1.34	1.33	0.1%	0.17%	- 0.01
Developed, Medium Intensity	0.17	0.58	0.0%	0.07%	+ 0.41
Evergreen Forest	0.00	0.00	0.0%	0.00%	0.00
Total	1,177.48	798.23	100.00	100.00%	- 379.25

The decreased LOD resulted in a large change in land cover impacts to cultivated crops and pasture/hay, which decreased by 249.77 and 120.07 acres, respectively.

The changes the Permit Holder is proposing as part of this minor modification will reduce the impact to existing plant communities and ecological communities described in Exhibit 11 of the Application. Areas that will be temporarily impacted during Facility construction will be restored in accordance with the Permit Holder's final Stormwater Pollution Prevention Plan (SWPPP) and Vegetation Management Plan, which will be submitted as a pre-construction compliance filing in accordance with 19 NYCRR §900-10.2(e)(4).

Impacts to wildlife species and their habitats are anticipated to be reduced as a result of the reduction in the Proposed Facility's LOD. The Permit Holder will employ the avoidance measures recommended in the Application for the Proposed Facility.

Exhibit 12: NYS Threatened or Endangered Species

The minor modifications proposed by the Permit Holder for the Proposed Facility will result in a reduction to impacts presented in Exhibit 12 – NYS Threatened or Endangered Species.

The changes the Permit Holder is proposing as part of this minor modification will reduce the potential impacts to New York State threatened and endangered species from [REDACTED] acres to [REDACTED] acres, as detailed in Appendix H: Occupied Habitat Review for Updated Layout. As described in Appendix H, approximately [REDACTED] acres of [REDACTED] occupied habitat will no longer have Facility components installed on it. The Permit Holder will provide an updated the Net Conservation Benefit Plan (NCBP), including a Mitigation Plan based on the revised numbers, prior to the start of construction in accordance with Uniform Standard Condition 5.4(o)(3)(ix) in the Siting Permit

While impacts to listed [REDACTED] species were already being avoided and minimized as described in the Application, the minor modification will reduce [REDACTED] by [REDACTED] acres. This reduction in [REDACTED] will provide additional [REDACTED] habitat for listed [REDACTED] species. As the overall impacts to listed species habitat is being reduced in this minor modification, no additional impacts to state-listed threatened or endangered species or their habitat is anticipated.

Exhibit 13: Water Resources and Aquatic Ecology

The minor modifications proposed by the Permit Holder for the Proposed Facility will result in a reduction to impacts presented in Exhibit 13 – Water Resources and Aquatic Ecology.

As outlined in the Application, wetland and stream delineations were conducted within the Facility Area and within a 100-foot buffer around the Permitted Facility LOD where land access was available. Delineated streams S-01, S-02, S-101, and S-107 were located completely outside of

the Permitted Facility LOD. The Proposed Facility will be located within the Permitted Facility LOD; therefore, change to these streams are not anticipated. Due to the reduced LOD for the Proposed Facility, the following delineated streams identified on Figure 13-2 of the Application would no longer be located within or immediately adjacent to the Facility:

- Stream A-4
- Stream S-06 segment to the north of Fields Road
- Stream S-101
- Stream S-102
- Stream S-103

Based on the reduction in LOD, the Permit Holder does not anticipate an increase in impacts to streams and surface water features. Final impacts to delineated streams will be quantified prior to the commencement of construction.

As detailed in Exhibit 13, there are no active public water supply wells located within 1,000 feet of the Permitted Facility LOD and the Facility components adhere to the required public water supply well setbacks. Additionally, no new water wells are located within the Proposed Facility LOD. The Proposed Facility will remain within the Permitted Facility LOD; therefore, impacts to the public water supply are not anticipated due to this minor modification. Impacts to ground water resources, such as NYSDEC mapped aquifers, and public drinking water supply wells, are not anticipated as a result of construction and operation of the Facility.

Chemical and petroleum bulk storage means and methods are not anticipated to change from those specified in the Application. The Permit Holder will prepare a Spill Prevention, Control, and Countermeasure (SPCC) Plan prior to the commencement of construction to detail the procedures and methods to be employed at the Facility to prevent chemical spills, as well as the cleanup and reporting procedures to be followed.

Aquatic species of concern were not identified within the Facility Site for the Permitted Facility. The Proposed Facility components will remain within the Permitted Facility LOD; therefore, impacts to aquatic threatened or endangered species and species of special concern are not anticipated.

The Permit Holder will employ erosion and sediment control measures at the Facility to prevent impacts to surface water features. The Facility's preliminary SWPPP included in the Application provides further discussion on the erosion and sediment control practices that will be in place to prevent impacts to surface and ground water. The Permit Holder will prepare a final SWPPP prior to the commencement of construction, detailing stormwater management practices and erosion and sediment controls for the Proposed Facility.

Exhibit 14: Wetlands

The minor modification proposed by the Permit Holder for the Proposed Facility will result in a reduction to impacts presented in Exhibit 14 – Wetlands.

The Proposed Facility components will remain within the Permitted Facility LOD; therefore, additional wetland delineations are not anticipated. In addition, the Jurisdictional Determination issued by ORES on April 2, 2021, and the Preliminary Jurisdictional Determination issued by

United States Army Corps of Engineers (USACE) on March 15, 2021 remain applicable to the resources affected by the Proposed Facility.

Due to the reduction in the Proposed Facility's LOD by 378 acres, the following delineated wetlands identified on Figure 14-2 of the Application are no longer located within or immediately adjacent to the Facility:

- | | | | |
|---------|---------|---------|---------|
| • W-29 | • W-103 | • W-114 | • W-121 |
| • W-35 | • W-104 | • W-115 | • W-123 |
| • W-37 | • W-110 | • W-116 | • W-129 |
| • W-38 | • W-112 | • W-118 | |
| • W-102 | • W-113 | • W-119 | |

Impacts on State-regulated wetlands (0.764 acres) and 100-foot adjacent areas (1.399 acres) for the Permitted Facility were associated with construction of the proposed overhead electrical collection line and associated tree clearing along Old Rome Road. This proposed collection line and tree clearing along Old Rome Road remain unchanged for the Proposed Facility; therefore, the impacts to State-regulated wetlands and adjacent areas are not anticipated to change as the result of this minor modification.

The Proposed Facility was designed to avoid wetlands and adjacent areas to the maximum extent practicable. Unavoidable impacts to federally regulated wetlands are still anticipated for the Proposed Facility to accommodate installation of PV modules, perimeter fencing, underground and overhead collection lines, and access roads.

Final impacts to State and federal jurisdictional wetlands will be calculated prior to filing permit applications required for authorizations under Sections 404 and 401 of the Clean Water Act. The Permit Holder will adhere to all applicable permit conditions required for wetland protection prior to, during, and following construction.

Prior to construction and following additional consultation with ORES and NYSDEC, the Permit Holder will submit a final Wetland Restoration and Mitigation Plan (WRMP) pursuant to §900-10.2(f)(2). This WRMP will include discussion of any additional avoidance and minimization measures to be employed during construction and operation to reduce impacts, mitigation proposed to compensate for unavoidable loss of wetlands functions and values, and a narrative describing the proposed environmental monitoring and management program to be implemented during construction to minimize potential adverse effects on wetlands.

Exhibit 15: Agricultural Resources

The minor modification proposed by the Permit Holder for the Proposed Facility will result in a reduction to impacts as presented in Exhibit 15 – Agricultural Resources.

The Proposed Facility components will remain within the Permitted Facility LOD, and no new areas of agricultural land will be disturbed. Potential impacts to agricultural land and mineral soil groups are expected to decrease as a result of the reduction in LOD for the Proposed Facility. As described in Section 1.0 above, the LOD has decreased from 1,177 acres to 799 acres. Compared to the Permitted Facility, the total acreage of mapped Mineral Soils Groups (MSG) 1-4 within the LOD will decrease from approximately 615.62 acres to 469.72 acres as detailed in Table 4 below.

Figure 15-10 of this minor modification shows the location of the Proposed Facility LOD in relation to MSGs 1-4.

Table 4 – Mineral Soil Groups

Mineral Soil Group	Permitted Facility Acreage	Proposed Facility Acreage ¹
1	0.00	0.00
2	115.96	79.31
3	305.87	230.62
4	193.79	159.80
5	186.91	106.88
6	230.65	154.19
7	84.06	50.42
8	58.59	16.07
9	0.55	0.00
10	0.00	0.00
Total	1,176.38	797.29

¹Individual MSGs may not add to the total LOD due to rounding.

The 2023 NLCD was also evaluated for potential impacts to Agricultural Land (Cultivated Crops) within the Proposed Facility LOD. Approximately 926 acres of Agricultural Land was located with the Permitted Facility LOD (2019 NLCD data), much of which would have been covered by PV modules. Due to the decrease in LOD, approximately 676 acres of Agricultural Land are now located within the Proposed Facility LOD.

An Agricultural Plan (Appendix 15-A of the Application) was prepared by the Permit Holder to address impacts and mitigation to active agricultural lands. In addition, a Drainage Remediation Plan (Appendix 15-B of the Application) was created to address inadvertent damages to surface or sub-surface drainage. The prevention methods and mitigation outlined in these plans will be followed for the Proposed Facility.

The Facility will adhere to the Agriculture Multi-Use Plan presented in the Application (Appendix 15-C). Due to the changes proposed in this minor modification, the total acreage of land available for co-utilization has decreased within the Proposed Facility LOD. However, the reduction in LOD will directly increase the amount of viable land available for agricultural use outside the fence, increasing opportunities for agricultural practices on surrounding parcels.

The Permit Holder identified parcels within the Facility Area with active cropland, pasture, or grassland based on United States Department of Agriculture, National Agricultural Statistics Service Cropland Data Layers from 2016-2020 (shown in Figure 15-6 of the Application). As a result of the decreased LOD for the Proposed Facility, there will be a reduction of active farmland being impacted by Facility components, specifically PV modules. Facility components are no longer proposed to be located on seven parcels identified as active farmland; therefore, these parcels will remain available for agricultural use. The reduction in LOD has decreased the total acreage of agricultural land that will be removed from production as a result of Facility construction and operation.

Exhibit 16: Effects on Transportation

The minor modification proposed by the Permit Holder for the Proposed Facility will result in a reduction to impacts as presented in Exhibit 16 – Effects on Transportation.

The Proposed Facility will result in a reduction in construction-related traffic at the Facility and surrounding areas. Due to the reduction in Facility components (PV modules, access roads, inverters, etc.) from the Permitted to the Proposed Facility, the number of equipment and material delivery trips will be reduced. The Permit Holder anticipates a reduction in semi-trailer PV module deliveries from 716 trips to 433 trips. The Permit Holder anticipates potential impacts to local traffic and school bus routes will remain the same or be reduced as stated in the Application and Supplements.

The new substation will require one additional oversized vehicle delivery for a second transformer at the substation. This one additional oversized delivery is not anticipated to result in impacts to local traffic volumes.

The Permit Holder will use the recommended construction haul routes as detailed in the Application and Supplements for the Permitted Facility. Due to a reduction in the Facility LOD, the Permit Holder anticipates Haul Routes 2A and 2D can be shortened and Haul Route 1D is no longer necessary. Prior to the commencement of construction, the Permit Holder will make a final determination on construction routes in consultation with the contractor(s), Town and County Highway Superintendents, and the New York State Department of Transportation (NYSDOT). The Permit Holder will re-assess the presence of weight restricted roads, bridges, and culverts are part of the final determination. In accordance with §900-10.2(e)(8), the Permit Holder will obtain the necessary transportation permits prior to the commencement of construction. The Permit Holder anticipates Road Use Agreements (RUA), Special Haul Permits for oversized/overweight vehicles, and Highway Work Permit for work within public rights-of-way (ROW) will be required as identified in the Application for the Permitted Facility.

The Federal Aviation Administration (FAA) issued a Determination of No Hazard to Air Navigation (Determination), effective through March 30, 2023. The Determination cited a PV module height of 15 feet above ground level. The Proposed Facility will not increase the PV module height; therefore, changes to the FAA's Determination are not anticipated. In accordance with §900-10.2(a), the Permit Holder will consult with the FAA to obtain a final determination prior to the commencement of construction.

Exhibit 17: Consistency with Energy Planning Objectives

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 17 – Consistency with Energy Planning Objectives.

The Proposed Facility will provide an additional 20 MW of solar electric generation, increasing the Facility's contribution to New York State meeting the objectives of the Climate Leadership and Community Protection Act (CLCPA), the Clean Energy Standard (CES), and other important state policies. The Proposed Facility's increased generation will result in approximately 67,017 tons of carbon dioxide (CO₂) displacement, an increase of 20,717 tons of CO₂ from the Permitted Facility.

Exhibit 18: Socioeconomic Effects

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 18 – Socioeconomic Effects.

The estimated construction workforce by quarter will shift from Q3 2022 – Q3 2023 (approximately 15 months) for the Permitted Facility to late Q1 2025 – early Q2 2026 (approximately 15 months) for the Proposed Facility. Contingency Plans for Fire or a Hazardous Waste Substance Incident are unchanged. The Permit Holder will also continue to reach out the local emergency response organizations prior to the start of construction.

The Proposed Facility will remain economically beneficial to the Towns and local communities. Economic benefits would include job creation, purchasing of local materials and equipment, and direct revenue to Jefferson County, Towns of Watertown and Hounsfield, Sackets Harbor Central School District, and South Jefferson Central School District. The Permit Holder will execute PILOT agreements and Host Community Agreements prior to the commencement of construction.

Exhibit 19: Environmental Justice

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 19 – Environmental Justice.

Review of the NYSDEC's Potential Environmental Justice Areas (PEJAs) indicates the closest PEJA remains over two miles from the Proposed Facility as previously presented in the Application. Disproportionate environmental impacts to the PEJA are not anticipated due to the proximity to the Facility.

Exhibit 20: Effects on Communication

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 20 – Effect on Communication.

The Permit Holder will install fiber optic cables along its collector network to communicate with the site equipment (inverters, trackers, and weather stations). All interconnections are projected to remain unchanged, with only a minor change in the substation's location to 700 feet north of where it was previously sited. Through a high-speed internet connection, the Facility plans to establish a communication link with Boralex's 24-hour operations control center. This connection will aid in year-round monitoring of the Facility including energy production data. Lastly, the Permit Holder will establish a direct communication channel between National Grid's existing Coffeen–West Adams 115 kV transmission line and the Facility's high voltage circuit breaker through a bi-directional direct transfer trip. During construction and operation of the Facility, no adverse effects or interference with existing communication and utility systems are anticipated.

Exhibit 21: Electric System Effects and Interconnection

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 21 – Electric System Effects and Interconnection.

The Proposed Facility includes increasing the generating capacity from 120 MW to 140 MW. At 140 MW, the Proposed Facility will consist of two NYISO queue positions, Q#864 (120 MW) and Q#843 (20 MW). Q#843 was previously proposed approximately 10 miles southwest along the transmission line from the Proposed Facility POI but is currently being proposed to be consolidated behind the same POI as Q#864. Through the remaining NYISO study process and into operation, Q#864 and Q#843 will be continued to be viewed by NYISO as two separate queue positions, however they will be physically consolidated with a shared collection substation and a single line-tap and single POI connecting to the existing 115 kV transmission line at the Proposed Facility.

To initiate the consolidation of the two NYISO queue positions, the Permit Holder submitted a non-material modification request to NYISO to move the Q#843 POI to be consolidated with Q#864 on December 22, 2023, this request is pending approval with NYISO; on January 25, 2024 NYISO indicated a response can be expected by mid-February 2024. Preliminary discussions and design review with NYISO and National Grid suggest that the request will be deemed non-material. The proposed relocation of Q#843 to be consolidated with Q#864 results in increased transmission reliability and decreased system impacts and costs and was received positively by National Grid. National Grid confirmed this relocation would not be material to Q#864 and would simplify system protections and controls associated with Q#843 by having both facilities behind a single tap connection.

Q#864 (120 MW) has an executed Interconnection Agreement (IA) with the NYISO, executed June 7, 2023. Q#843 (20 MW) has an executed Facility Study with the NYISO, executed January April 4, 2023, and an IA was tendered in May 2023. These two projects represent the only projects connecting to the National Grid Coffeen – West Adams Line 2 (the original Q843 POI is approximately 10 miles southwest along the transmission line from the Proposed Facility POI).

The System Reliability Impact Study (SRIS) for Q#864 was previously submitted as part of the initial 94-c application and remains valid. The System Impact Study (SIS) for Q843 has been provided as Appendix I to ORES by separate confidential cover as part of this minor modification.

Exhibit 22: Electric and Magnetic Fields

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 22 – Electric and Magnetic Fields.

The Proposed Facility consists of a 34.5 kV collector network (one additional 34.5 kV collector line was added to accommodate the additional 20 MW) leading to a collection substation situated immediately adjacent to the 115 kV POI on the National Grid Coffeen–West Adams 115 kV transmission line. The 94-c application design for the Permitted Facility also included a 34.5 kV collector network with a collection substation immediately adjacent to the existing 115 kV POI, and an electric and magnetic fields (EMF) study was confirmed as not necessary considering that the Permitted Facility was not proposing a new 115 kV ROW in order to interconnect at the POI from the adjacent collector substation. As shown on Sheet 10 of Appendix B: Updated Design Drawings, the Proposed Facility substation boundary continues to be immediately adjacent to the National Grid 115 kV ROW and the Permit Holder also is continuing to not propose a new 115 kV ROW to connect with the POI at the Proposed Facility.

The general conclusions that the Permitted Facility 34.5 kV collector network does not require an EMF study remain true for the Proposed Facility, as the addition of one 34.5 kV circuit does not

change these conclusions considering the additional 34.5 kV collector line will feature the same characteristics as the other collector lines previously confirmed to not require an EMF study for the Permitted Facility. Regarding the 115 kV interconnection, although the collection substation has moved north approximately 700', the collection substation remains immediately adjacent to the National Grid ROW and therefore no change has been proposed to the Proposed Facility that could be interpreted to increase EMF, and therefore the conclusion that the Permitted Facility does not require an EMF study holds true for this component of the Proposed Facility as well.

Exhibit 23: Site Restoration and Decommissioning

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 23 – Site Restoration and Decommissioning.

The Decommissioning and Restoration Plan provided in the January 4, 2022 Supplement to the Permitted Facility's 94-c Application has been revised to reflect the change in quantity of equipment (e.g., inverters), type of equipment (specifically the 605 Wp panels versus the permitted 350 Wp panels), and cost allocation between the Towns based on the Proposed Facility Layout (see Appendix J – Decommissioning and Restoration Plan). The changes in the Revised Decommissioning Plan include only Tables 1 to 4. No new information regarding module salvage value approach or economic references are provided. The Permit Holder acknowledges that a Final Decommissioning Plan, including this information, remains outstanding and will be provided during the pre-construction compliance filing process.

Within the revised Decommissioning and Restoration Plan, all unit pricing for the decommissioning and salvage costs were left unchanged from the January 2022 Supplement, with the exception of salvage cost per module. The module selected for the Proposed Facility is larger, heavier, and has an increased wattage over what was selected for the Permitted Facility. This increase in weight leads to more salvageable material in each module.

Due to a reduction in the number of PV modules and inverters, and overall lengths for fencing and access roads, the gross decommissioning cost estimate for the site decreased compared with the previous estimate. As with the Permitted Facility, the salvage value remains greater than the gross decommissioning cost estimate. The cost estimates in the January 2022 Supplement and the Revised Decommissioning Plan do not include any resale value.

Exhibit 24: Local Laws and Ordinances

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 24 – Local Laws and Ordinances.

Town of Hounsfield Local Laws:

The Siting Permit from September 22, 2022 granted waivers from three local laws in the Town of Hounsfield:

- Local Law § 619(c)(1): Any structure and equipment shall comply with all the minimum setbacks for principal structures established in the Town of Hounsfield Zoning Law except that any solar structures and equipment shall be located at least 100' from any lot containing a single or multi-family residence or Agriculture and Residential, Multi-Use of Industrial zoning district boundary.

- Local Law § 619(c)(3): A Large-Scale Solar Energy System that is ground-mounted shall not exceed forty (40) percent of the total size of the lot or parcel on which it is installed. The surface area covered by Solar Panels shall be included in total lot coverage.
- Local Law § 619(c)(5): . . . No more than fifteen (15) percent of the total existing brush, trees, and other screening vegetation on a parcel of property may be removed in order to accommodate a solar farm. . .

Local Law §619(c)(1) pertains to three participating parcels divided by the boundary line between the Town of Hounsfield and the Town of Watertown, and the Proposed Facility is still compliant with this local law.

Local Law §619(c)(3) pertains to eight participating parcels listed in the original application Exhibit 24, Table 24-5, and Appendix 24-C (Document Matter Master (DMM) Item No. 31). The buildable area for the Proposed Facility remains only on those same eight parcels that were granted relief from the Hounsfield Local Law §619(c)(3); therefore, no additional local law waivers are necessary, and ground coverage ratio figures remain the same as the original application and were not reproduced. The eight parcels are listed in the Exhibit 4 section above as Table 2. The Proposed Facility remains in compliance with this local law waiver.

Local Law §619(c)(5) pertains to three participating parcels listed in the original application Exhibit 24, Table 24-6 (DMM Item No. 31). The Proposed Facility has reduced overall vegetative clearing from 38.3 to 24.5 acres. Of the three participating parcels that were granted relief from this local law, parcel 90.00-4-9 has been removed from the proposed Facility Area and will not require vegetative clearing, vegetative clearing at parcel 82.00-3-56.2 has been reduced from 8.3 acres to 7.5 acres and proposed vegetative clearing at parcel 82.00-3-57.1 remains the same. Due to the reduction in proposed vegetative clearing, the Proposed Facility remains in compliance with this local law waiver.

The remainder of the changes the Permit Holder is proposing as part of this Minor Modification comply with the substantive standards in the Hounsfield and Watertown local laws. The Permit Holder has continued consultations with the Towns regarding ongoing compliance with the Local Laws and has reviewed the changes proposed in the Minor Modification with the Towns. The Permit Holder understands that the Towns do not have concerns with the modifications as proposed in this Minor Modification.

Section 4(b) of the Final Siting Permit:

The Facility Siting Permit from September 22, 2022 granted a waiver that the decommissioning and site restoration provisions in the Town of Watertown Zoning Law § 107-16.1(c)(5) and (6), and Town of Hounsfield Zoning Law § 619(b)(5) and (6), shall be inapplicable to the Proposed Facility. The Proposed Facility is still compliant with this local law, and both Towns do not have concerns with the permitted waivers.

Exhibit 25: Other Permits and Approvals

The minor modifications proposed by the Permit Holder for the Proposed Facility do not alter the general conclusions presented in Exhibit 25 – Other Permits and Approval and does not change the permits and approvals outlined in the original Application.

The Permit Holder anticipates the following permits and consultations would be required for the Proposed Facility:

- NYSDOT - Special Hauling Permit.
- NYSDEC - State Pollutant Discharge Elimination System (SPDES) Permit.
- USACE Nationwide Permit for the Placement of fill in federal jurisdictional Waters of the United States (WOTUS) pursuant to Section 404 of the Clean Water Act (CWA).
- NYSDEC Water Quality Certification for activities covered under Section 404 of the CWA.
- FAA – Notice of Proposed Construction as required to file under §77.9.
- United States Fish and Wildlife Service (USFWS) – Continued consultation with USFWS to minimize potential adverse effects on federally listed species and their habitats.
- Section 106 Consultation – Per the March 18, 2022 supplement to the Permitted Facility 94-c application Appendix 9-F SHPO Adverse Effects Letter, a CRAMMP will be submitted to SHPO via the Cultural Resource Inventory System (CRIS) regarding options that will avoid or minimize visual impacts associated with the Facility.