Exhibit A: Layout and Design Summary and Impact Analysis

Hoffman Falls Wind Project

Towns of Fenner, Nelson, Eaton, & Smithfield,
Madison County, New York

Matter Number: 23-02976

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LIST OF ABBREVIATIONS AND ACRONYMS

ADLS	Aircraft Detection Lighting System
EMF	Electric and Magnetic Field
GE	General Electric
HCA	Host Community Agreement
HDD	Horizontal Directional Drilling
JD	Jurisdictional Determination
kV	Kilovolt
LLC	Limited Liability Company
LOD	Limits of disturbance
MET	Meteorological Tower
MSG	Mineral Soil Group
MW	Megawatt
NCBP	Net Conservation Benefit Plan
NYCRR	New York Codes, Rules & Regulations
NYSHPO	New York State Historic Preservation Office
O&G	Oil & Gas
O&M	Operations and maintenance
ORES	Office of Renewable Energy Siting and Electric Transmission
PILOT	Payment in Lieu of Taxes
POI	Point of Interconnection
RAA	Regulated Adjacent Area
RAPID Act	Renewable Action through Project Interconnection and Deployment Act
SSC	Site Specific Condition
WDR	Wetland Delineation Report

1.0 INTRODUCTION

The Office of Renewable Energy Siting and Electric Transmission (ORES) issued a Major Renewable Energy Facility Siting Permit (Siting Permit) to Hoffman Falls Wind LLC (the Permittee) for the Hoffman Falls Wind Project (the Project or Facility) on December 22, 2025. The Permit includes Site Specific Conditions (SSCs) and applicable Uniform Standards and Conditions that must be met during the pre-construction, construction, and operation phases of the Facility. Since the issuance of the Siting Permit, modifications to the layout and design of the Facility have been made to avoid and minimize impacts to wetlands and streams, account for landowner requirements, and reflect the proposed use of the General Electric GE158 6.1 MW turbine.[1] These changes are depicted in Figure 1.

The proposed modifications include:

- The elimination of six wind turbines (T-1, T-2, T-11, T-15, T-17, and T-24) and the redesign of infrastructure associated with these wind turbines.
    - As a result of the selection of the GE158 turbine, the Permittee is also requesting that the nameplate capacity of the Facility be increased from 100 MW to 109.8 MW.
- Changes to the layout and design of supporting infrastructure, including access roads, temporary turn improvements, collection lines, and the collection substation and point of interconnection (POI), to avoid impacts to wetlands and streams.

The proposed minor modifications will not result in any material increase in any identified adverse environmental impact or any significant adverse environmental impact not addressed by uniform or site-specific standards or conditions or otherwise involve a substantial change to the existing permit standards or conditions.

The proposed changes would reduce land use impacts, noise and vibration impacts, visual impacts, shadow flicker impacts, plant community impacts, stream impacts, wetland impacts, and agricultural impacts. This overview document describes the proposed minor modifications and includes a detailed environmental assessment of the substantive changes proposed by the Permit Holder. In support of the changes proposed, the Permit Holder has developed supporting figures and appendices, where applicable, as outlined herein. All exhibit references in this permit modification request refer to exhibit numbers identified in the Article VIII regulations, which correspond to the exhibits in the full Siting Permit record, including the February 15, 2024 Hoffman Falls Wind Siting Permit Application and all supplements thereto under Article VIII of the Public Service Law (the Application).

2.0 PROPOSED MODIFICATION

The Permitted Facility description provided in Table 1 below reflects the design and layout permitted by ORES on December 22, 2025 (the Permitted Facility or Permitted Layout). An outline of the changes the Permit Holder

[1] This wind turbine model was permitted in the Siting Permit.

is proposing as part of this permit modification request (the Proposed Facility or Proposed Layout) is provided in Table 1, Figure 1 (Layout Comparison), the subsections below, and the attached figures and appendices.

As shown in Table 1 and Figure 1, the changes proposed by the Permittee in this request are minor modifications to the access roads, collection line corridors, stormwater practices, the collection substation, and POI switchyard, turn improvements and the elimination of wind turbines T-1, T-2, T-11, T-15, T-17, and T-24. These changes do not materially change the Permitted Layout and will not result in material increases in any environmental impact.

Table 1. Permitted Facility and Proposed Facility Modifications

Facility Component / Feature[1]	Permitted Facility	Proposed Facility
Facility Site	60 parcels totaling 3,897 acres, inclusive of all parcels or portions of parcels proposed to host Facility components.	53 parcels totaling 3,841 acres, inclusive of all parcels or portions of parcels proposed to host Facility components.
Limit of Disturbance / Grading	420 acres of disturbance and 220 acres of grading.	384 acres of disturbance and 186 acres of grading. • All soil disturbance and grading has been removed from wetlands and streams.
Access Roads	12.5 miles of access roads surfaced with crushed stone or gravel. Access roads will be approximately 20 feet wide.	10.5 miles of access roads. No changes to the permitted materials or width. • Access roads to Turbines T-1, T-2, T-11, T-15, T-17, and T-24 have been removed (see Figure 1). • Access roads to Turbines T-3, T-8, T-10, T-12, T-13, T-14, and T-19, and the collection substation and POI switchyard have been redesigned.[2] • All access roads now avoid wetland and stream impacts.
Electrical Collection System	31.3 miles of underground collection line, 150 feet of overhead transmission line.	23.8 miles of underground collection line and 230 feet of overhead transmission line. • Collection lines have been to redesigned accommodate the removal of the six turbines and the addition of new horizontal directional drilling (HDD) crossings to avoid wetland and stream impacts. • Overhead transmission lines have been redesigned to accommodate the new POI switchyard location.
Wind Turbines	24 turbines with a maximum blade tip height of 196 meters (643 feet) above ground level and a maximum rotor diameter of 158 meters (518 feet).	18 turbines; no changes to the permitted maximum blade tip height or rotor diameter are proposed. • Turbines T-1, T-2, T-11, T-15, T-17, and T-24 have been removed, reducing noise, vibration, and visual impacts associated with these turbines. • No changes to the locations of the remaining turbines are proposed.

[2] This list includes redesigned access road routes; access roads that have only been minimally optimized (e.g., access roads to Turbines T-6, T-9, etc.) are not included in this list but are shown in Figure 1.

Facility Component / Feature[1]	Permitted Facility	Proposed Facility

Wetland and Stream crossings	• 22 collection line wetland crossings (10 HDD crossings and 12 trenched crossings).
	• 27 collection line stream crossings (11 HDD crossings and 16 trenched crossings).
	• 13 access road wetland crossings.
	• 15 access road stream crossings.
		• 18 collection line wetland crossings
		  ○ All collection line wetland crossings will utilize HDD to avoid direct impacts to wetlands.
		• 23 collection line stream crossings.
		  ○ All collection line stream crossings will utilize HDD to avoid direct impacts to streams.
		• 1 access road wetland crossing.
		  ○ The single access road wetland crossing will utilize an open bottom culvert or bridge to avoid direct impacts to the wetland.
		• 12 access road stream crossings.
		  ○ All access road stream crossings will utilize open bottom culverts, bridges, or existing culverts to avoid direct impacts to streams.

Collection Substation & POI Switchyard	Collection substation and POI switchyard located SE of the POI, adjacent to Cody Road.	Collection substation and POI switchyard located NW of the POI. • These facilities have been shifted approximately 550 feet west and are no longer immediately adjacent to Cody Road. • These facilities now avoid all wetland and stream impacts.
Temporary Construction Laydown Yards	Three temporary construction laydown areas totaling approximately 27.0 acres.	Three temporary construction laydown areas totaling approximately 28 acres. • Only slight modifications to the permitted laydown areas are proposed (see Figure 1).

[1] This table includes a summary description of those Facility components/features that are proposed to be modified. For further information on the proposed changes and the proposed layout, please refer to Figure 1-1, the revised plan, profile, and detail drawings (Appendix 5-A, Revision 2), and the discussions in this exhibit.

3.0 ENVIRONMENTAL ASSESSMENT

3.1 Exhibit 1: General Requirements

The changes the Permit Holder is proposing in this permit modification request would not affect the general content or conclusions reached in Exhibit 1 of the Application.

3.2 Exhibit 2: Overview and Public Involvement

The changes the Permit Holder is proposing in this permit modification request would not affect the general content or conclusions reached in Exhibit 2 of the Application.

3.3 Exhibit 3: Location of Facilities and Surrounding Land Use

As shown in Figure 1-1 (Layout Comparison), both the Permitted Facility and the Proposed Facility occur within the same general bounds and land used types.

The changes proposed in this permit modification request would decrease disturbance and grading by 36 acres and 34 acres, respectively. Impacts to land use would commensurately be reduced and no substantive impacts to new land use types are proposed.

The Permit Holder conducted a supplemental magnetometer survey for the Project in compliance with Site Specific Condition (SSC) 5(e) of the Siting Permit and 16 NYCRR Section 1100-2.4(u) (see Appendix 3-C). The supplemental magnetometer survey, together with the magnetometer survey completed to support the Article VIII Application, represents a complete survey of the area identified in 16 NYCRR Section 1100-2.4(u)(1) (see Figure 3-13).[3] The supplemental survey did not identify any oil and gas (O&G) wells within the supplemental survey boundaries. All aerial and ground identified anomalies were confirmed as non-well features (e.g., steel debris, vehicles, agricultural equipment, etc.). No O&G wells were identified during this magnetometer survey or any previous magnetometer survey.

Although the changes the Permit Holder is proposing as part of this permit modification request would result in some reductions to the Facility's impacts on land use, these reductions do not substantively change the conclusions reached in Exhibit 3 of the Application.

3.4 Exhibit 4: Real Property

As discussed in Section 2.0, the proposed Facility Site includes seven fewer parcels in total than the permitted Facility Site. In addition, the Permit Holder has secured additional agreements with landowners within and adjacent to the Proposed Facility Site. This updated property information is provided in revised Appendix 4-B.

[3] The Permittee surveyed all areas within 500 feet of the limits of disturbance (LOD), with the exception of areas with the potential to pose potential health, safety, or private land ownership concerns, including residential and commercial areas within the Facility Site and areas outside the Facility Site on land not controlled by the Permittee. The Permittee did not fly unmanned aerial vehicles (UAVs) over residences, commercial structures, or non-participating parcels.

Final real property rights documentation will be provided as a pre-construction compliance filing pursuant to 16 NYCRR Section 1100-10.2(h).

The Permitted Facility and Proposed Facility include components on one parcel that has land enrolled in the 480-a Forest Tax Law Program (parcel ID 79.-1-3). As a result of the proposed changes to the layout and design of the collection substation and POI switchyard, the overall impact to land enrolled in the program increased from 0.2 acre to 0.3 acre (see revised Figure 4-2) As detailed in Exhibit 4 of the Application, the Permit Holder will work with the landowner to identify additional eligible lands to ensure the parcel remains in the 480-a program or is made whole from a tax perspective, as needed.

3.5 Exhibit 5: Design Drawings

The changes proposed in Section 2 and Table 1 are shown in the revised design drawings for the Facility (revised Appendix 5-A, Appendix 5-B, and Appendix 5-C). The drawings were prepared at a common engineering scale by Westwood Surveying and Engineering, P.C. (Westwood) under the direction of a professional engineer, licensed and registered in New York State.

As noted in Section 2, along with shifts to the collection line routing, the Permit Holder is also proposing to use HDD at all wetland and stream collection line crossings.

Table 2. New HDD Locations and Associated Protected Resources

Town	Proposed HDD Location	Resource/Constraint	Change from Permitted Layout	Appendix 5-A Sheet #
Fenner	Northwest of T-7	Wyss Road	Permitted Layout included trenched collection line across this feature.	EC304
	Southeast of T-6	Wetland 66-W002	Permitted Layout included trenched collection line across this feature.	EC303
	Northwest of T-8	Wetland 66-W003	Permitted Layout included trenched collection line across this feature.	EC304
	Northeast of T-8	Wetland 12-W013	Permitted Layout included trenched collection line across this feature.	EC315
	Southeast of T-8	Stream 26-ST011	Permitted Layout included trenched collection line across this feature.	EC316
	South of T-5	Wetland 10-W002	Permitted Layout included trenched collection line across this feature.	EC302, EC303
	East of Collection Substation	Stream 66-ST008 Wetland 66-W019	New collection line crossing location.	EC301
Smithfield	East of T-12	Wetland 33-W017	Permitted Layout included trenched collection line across this feature.	EC320
Eaton	North of Stone Bridge Road	Wetland 23-W010	Permitted Layout included trenched collection line across this feature.	EC328, E329
	North of Stone Bridge Road	Wetland 23-W011 Stream 23-ST001A	Permitted Layout included trenched collection line across these features.	EC329
	East of Brooks Road	Wetland 33-W011 Stream 12-ST021	Permitted Layout included trenched collection line across these features.	EC331

Town	Proposed HDD Location	Resource/Constraint	Change from Permitted Layout	Appendix 5-A Sheet #
	Northwest of T-18	Stream 10-ST005 Stream 12-ST003 Wetland 12-W003 Wetland 12-W004	Permitted Layout included trenched collection line across these features.	EC331, EC332
	East of Davis Corners Road	Stream 33-ST003	Permitted Layout included trenched collection line across this feature.	EC341
	South of T-23	Stream 93-ST004	Permitted Layout included trenched collection line across this feature.	EC342

Changes to access roads were made to accommodate landowner requests, optimize Facility design, and to avoid and minimize impacts to wetlands and streams. A description of each of the proposed access road changes is provided below:

- Access Road to T-1 – The access road from South Road to T-1 has been removed.
- Access Road to T-2 – The permanent access road from Wyss Road to T-2 has been removed. The temporary access road to the laydown yard remains and generally matches the Permitted Facility.
- Access Road to T-3 – Portions of the access route from Wyss Road to T-3 have been modified to avoid wetland impacts.
- Access Road to T-4 – As part of the changes made to the access road to T-3 to demonstrate wetland avoidance, slight shifts to this access road were made to optimize the design. Otherwise, the proposed access route generally matches the Permitted Facility.
- Access Road to T-5 – The entrance of the access road from Cody Road to T-5 has been moved approximately 50 feet west to avoid wetland impacts.
- Access Road to T-6 – Slight shifts to this access road were made to optimize the design, but otherwise the proposed access route generally matches the Permitted Facility.
- Access Road to T-8 – The entrance of the access road from Wyss Road to T-8 has been moved approximately 975 feet southwest to avoid wetland impacts.
- Access Road to T-10 – The entrance of the access road from Mutton Hill Road to T-10 has been removed and a new access road connection between T-8 and T-10 is proposed. The new access route follows the collection line corridor included in the Permitted Facility (i.e., minimizes new tree clearing impacts) and avoids wetland and stream impacts.
- Access Road to T-11 – The access road from Mutton Hill Road to T-11 and the access road connection between T-11 to T-12 have been removed.
- Access Road to T-12 – The entrance of the access road from Pleasant Valley Road to T-12 has been moved approximately 60 feet north and portions of the access route have been modified to avoid wetland impacts.
- Access Road to T-13 – The entrance of the access road from Roberts Road to T-13 has been moved approximately 490 feet south and the access road has been rerouted to avoid wetland impacts.
- Access Road to T-14 – The entrance of the access road from Pleasant Valley Road to T-14 has been moved approximately 260 feet north and portions of the access route have been modified to avoid

wetland and stream impacts. A new road entrance on Stone Bridge Road that provides access to the MET tower and T-14 has been added to facilitate construction and operation of the Facility.

- Access Road to MET Tower and T-15 – Slight shifts to this access road were made to optimize the design and account for T-15 being removed from the Proposed Facility, but otherwise the proposed access route generally matches the Permitted Facility.
- Access Road to T-16 – Portions of the access road from US HWY 20 to T-16 have been modified to avoid stream impacts.
- Access Road to T-17 – The access road from Stone Bridge Road to T-17 has been removed.
- Access Road to T-18 – The entrance of the access road from Stone Bridge Road to T-18 has been moved west approximately 50 feet and portions of the access route have been modified to optimize the design.
- Access Road to T-19 – A new access road entrance on Davis Corners Road that provides direct access to T-19 has been added to facilitate maintenance activities during operations.
- Access Road to T-20 – Slight shifts to this access road were made to optimize the design, but otherwise the proposed access route generally matches the Permitted Facility.
- Access Road to T-21 – The entrance of the access road from Davis Corners Road to T-21 has been moved south approximately 50 feet to address landowner concerns.
- Access Road to T-23 – The entrance of the access road from Davis Corners Road to T-23 has been moved south approximately 20 feet to optimize the design
- Access Road to T-24 – The access road from Brooks Road to T-24 has been removed.
- Access Road between Old County Road and US-20 – Slight shifts to this access road were made to avoid wetland impacts, but otherwise the proposed access route generally matches the Permitted Facility.
- Access Road to the Collection Substation and POI Switchyard – The entrance of the access road to the collection substation and POI switchyard has been moved approximately 275 feet west to avoid wetland and stream impacts.

The changes to the access road locations in the Proposed Facility do not materially differ from the Permitted Facility in regard to impacts to sensitive resources, with the exception of wetlands, in which the Proposed Facility substantively reduces impacts (see Section 3.14).

The changes the Permit Holder is proposing in this permit modification request do not otherwise affect the general content or conclusions reached in Exhibit 5 of the Application.

3.6 Exhibit 6: Public Health, Safety and Security

In accordance with 16 NYCRR Section 1100-2.7 (c), 1100-10.2, and Site-Specific Condition (d) of the Siting Permit, the Permit Holder will submit a Final Safety Response Plan as part of compliance filings prior to the start of construction. The changes proposed by the Permit Holder as part of this permit modification request do not substantively change the conclusions reached in Exhibit 6 of the Application. The Facility will be constructed in accordance with applicable health and safety standards established in the Siting Permit and the Article VIII regulations. The Permit Holder is committed to developing, constructing, and operating the Facility in a safe and environmentally responsible manner.

3.7 Exhibit 7: Noise and Vibration

A Sound Modeling Addendum was prepared to address the removal of T-1, T-2, T-11, T-15, T-17, and T-24, the proposed use of the General Electric GE158 6.1 MW turbine[4] and the updated participation status of various potentially sensitive receptors and parcels (Appendix 7-N). The results of the addendum indicate that noise and vibration at all participating and non-participating parcels and residences complies with the Siting Permit sound limit requirements.

Figure 7-4.1 of the Sound Modeling Addendum demonstrates compliance with the non-participating property line limit of 55 A-weighted decibels (dBA) L_{eq} (8-hour), short-term equivalent continuous average nighttime sound level from the Project across any portion of a non-participating property line. As shown in the tables in of the Sound Modeling Addendum, the highest modeled (L_{eq}[8-hr]) sound level at a non-participating sensitive receptor is 45 dBA at receptor 1818, a year-round residence. The highest modeled (L_{eq}[8-hr]) sound level at a participating sensitive receptor is 46 dBA at receptor 547, a year-round residence. The predicted worst-case 8-hour L_{eq} sound levels from the Project are at or below the 8-hour L_{eq} design goals of 45 dBA for non-participating receptors, 55 dBA for participating receptors, and the worst -case 1-hour L_{eq} 65 dB in the 16 Hertz (Hz), 31.5 Hz, and 63 Hz octave bands for non-participating receptors at all modeled residences.

With the changes the Permit Holder is proposing as part of this permit modification request, including the removal of six turbines, the Proposed Facility will reduce noise and vibration impacts, as compared to the Permitted Facility. Notably, the Proposed Facility complies with all Article VIII sound requirements and will no longer require noise and vibration mitigation to meet the applicable Uniform Standards and Conditions.

3.8 Exhibit 8: Visual Impacts

A Supplemental Visual Assessment report (Appendix 8-D) and a revised Shadow Flicker Analysis report (Appendix 8-B, Attachment A – Revision 2) have been prepared to address changes in Facility visibility and visual impact that would result from the proposed Facility design modifications, including the modifications to the proposed Conceptual Landscape Mitigation Planting Plan (Appendix 8-B, Attachment B – Revision 1).

The updated wind turbine blade tip viewshed analysis indicates that the proposed removal of six wind turbines will result in a small decrease in the overall geographic extent of wind turbine visibility due to the fact that other proposed wind turbines would still be visible from most locations in the removed wind turbine's viewshed. Although overall wind turbine visibility is relatively unchanged, a reduction in visual impacts occurs in several viewpoints that have unobstructed views of multiple wind turbines in the foreground or middle ground of views where turbine removal is visible (see Appendix 8-D). In these views, the proposed turbines appear less numerous and/or more spread out on horizon, reducing the "stacking" effect that occurs when wind turbines projects are viewed at a distance. Consequently, the arrangement of the turbines across the landscape appears more orderly and less cluttered. A reduction in visual impact also occurs in locations where a removed turbine is in the foreground of the view and fully or substantially exposed.

[4] This wind turbine model was permitted in the Siting Permit.

The updated viewshed analysis for the proposed interconnection facility (i.e., the collection substation, POI switchyard, and transmission line/structures) also indicates a decrease in the overall geographic extent of visibility. The reduction in visibility is primarily attributable to the relocated position of the proposed substation and switchyard, which are located at lower elevations and set back further from Cody Road, as well as the reduction in height of the transmission line structures. The photosimulations prepared from two viewpoints adjacent to the interconnection facility along Cody Road demonstrate that the proposed modifications to the layout of these components will not significantly change the overall visual impact of this Facility component, which is anticipated to remain concentrated in a small geographic area, or the effectiveness of the mitigation plantings (see Appendix 8-D).

The revised shadow flicker analysis indicates that the number of turbines that will require shadow flicker curtailment software to comply with the 30 hour per year maximum shadow flicker duration limit has reduced from 20 to 13. The Permittee will complete a final shadow flicker assessment as part of the final Visual Impact Minimization and Mitigation Plan (VIMMP) and will seek Good Neighbor Agreements (GNA) with each landowner and/or implement shadow flicker curtailment measures to limit shadow flicker impacts to under 30 hours per year for all non-participating residences, in compliance with the Article VIII regulations.

Although the changes the Permit Holder is proposing as part of this permit modification request would reduce overall Facility visibility and visual impacts when compared to the Permitted Facility, these reductions do not substantively change the conclusions reached in Exhibit 8 of the Application.

3.9 Exhibit 9: Cultural Resources

3.9.1 Archaeological Resources

To evaluate potential impacts to archaeological resources from the limit of disturbance (LOD) modifications proposed in this permit modification request, the Permit Holder completed supplemental Phase IB and Phase II archaeological surveys in the summer and fall of 2025. As part of this effort, the Permit Holder developed and submitted the following materials to New York State Historic Preservation Office (NYSHPO): a Phase IB Testing and Phase II Site Examination Notification Memo, a Phase II Site Examination Work Plan, a Phase II Site Examination Report, and a Phase IB Survey Addendum Memo. NYSHPO has completed their review of all submitted materials and concluded in their most recent correspondence that "no further archaeological investigation is recommended" (see revised Appendix 9-A, Appendix 9-J, Appendix 9-K, and Appendix 9-L). The revised Archaeological Avoidance Plan for the Facility is provided as revised Appendix 9-I. The Permit Holder will provide any additional correspondence from the NYSHPO once received.

3.9.2 Historic Resources

As detailed in Section 3.8, the changes the Permit Holder is proposing as part of this permit modification request would not result in an increase in the Facility's visual impacts or substantively change the conclusions reached in Exhibit 9 of the Application with respect to historic resources.

The Permit Holder will submit the final Cultural Resources Avoidance, Minimization, and Mitigation Plan, Unanticipated Discovery Protocol, and Cultural Resources Mitigation and Offset Plan in compliance with 16 NYCRR Section 1100-10.2(g)(2) as a pre-construction compliance filing.

3.10 Exhibit 10: Geology, Seismology and Soils

As detailed in Section 2, the proposed change to the layout of the Facility is minor and does not materially change the location of the Facility. The information and conclusions reached in Exhibit 10 of the Application remain applicable.

3.11 Exhibit 11: Terrestrial Ecology

As a result of the changes proposed in this permit modification request (see Table 1), Facility disturbance would decrease by 36 acres (9%), the area of impervious surface would decrease by 1 acre (2%), and the grading area would decrease by 34 acres (15%).

As indicated in Table 5, most temporary and permanent impacts will occur within Terrestrial Cultural communities (e.g., row cropland and developed/disturbed areas). This is consistent with the impacts from the Permitted Facility. While there are some slight changes in the proportion of the various communities that would be impacted by the Permitted Facility as compared to the Proposed Facility, impacts to ecological communities have generally decreased across the board. This is particularly true for natural communities (e.g., impacts to forested uplands have decreased 9%).

Although the changes the Permit Holder is proposing as part of this permit modification request would result in some reductions to the Facility's impacts on terrestrial ecology, these reductions do not substantively change the conclusions reached in Exhibit 11 of the Application.

Table 3. Ecological Community Impact Comparison

Community Type	Temporary Impacts (acres)[1]		Permanent Conversion (acres)[2]		Permanent Impacts (acres)[3]		Total Impacts (acres)	
	Permitted Facility	Proposed Facility	Permitted Facility	Proposed Facility	Permitted Facility	Proposed Facility	Permitted Facility	Proposed Facility
Open Uplands	**34.1**	**35.1**	**12.1**	**8.4**	**6.7**	**4.9**	**52.9**	**48.4**
Successional Shrubland	12.0	12.7	5.6	3.5	1.5	1.9	19.1	18.1
Successional Old Field	22.1	22.4	6.5	4.9	5.2	3.0	33.8	30.3
Terrestrial Cultural	**218.1**	**207.3**	**24.5**	**15.7**	**19.4**	**20.6**	**262.0**	**243.6**
Field Cropland	30.1	29.3	2.2	1.3	3.5	2.4	35.8	33.0
Row Cropland	133.9	120.1	5.8	4.2	10.3	12.5	150.0	136.8
Pastureland	19.7	18.9	1.1	0.9	1.7	1.8	22.5	21.6
Spruce/Fir Plantation	8.4	6.2	1.7	1.7	0.8	0.5	10.9	8.4
Successional Spruce/Fir Plantation	18.7	23.4	13.0	7.4	2.7	3.3	34.4	34.1
Developed/Disturbed	7.3	9.4	0.7	0.2	0.4	0.1	8.4	9.7
Forested Uplands	**59.7**	**61.1**	**35.0**	**24.3**	**6.3**	**6.1**	**101.0**	**91.5**
Beech-Maple Mesic	37.8	37.8	22.1	15.0	3.6	4.2	63.5	57.0
Successional Northern Hardwood	19.8	21.2	11.9	8.1	2.2	1.5	33.9	30.8
Hemlock Northern Hardwood	2.1	2.1	1.0	1.2	0.4	0.4	3.5	3.7
Open Wetlands	**2.2**	**0.4**	**0.8**	**<0.1**	**0.2**	**<0.1**	**3.2**	**0.4**
Emergent (PEM)	0.9	0.1	0.1	<0.1	<0.1	<0.1	1.0	0.1
Shrub Scrub (PSS)	1.3	0.3	0.7	0.0	0.1	0.0	2.1	0.3
Open Water (POW)	--	<0.1	--	0.0	--	0.0	--	<0.1
Forested Wetlands	**0.3**	**<0.1**	**0.2**	**0.0**	**0.1**	**0.0**	**0.6**	**<0.1**
Forested (PFO)	0.3	<0.1	0.2	0.0	0.1	0.0	0.6	<0.1
Riverine	**0.2**	**<0.1**	**0.2**	**<0.1**	**<0.1**	**<0.1**	**0.4**	**<0.1**
Natural Stream	0.0	<0.1	0.0	<0.1	0.0	<0.1	0.0	<0.1
Perennial (R3)	0.1	<0.1	0.1	<0.1	<0.1	<0.1	0.2	<0.1
Intermittent (R4)	0.1	<0.1	0.1	<0.1	<0.1	<0.1	0.2	<0.1
Ephemeral (R6)	<0.1	0.0	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
TOTAL	**314.5**	**304.7**	**72.8**	**48.3**	**32.7**	**30.8**	**420.0**	**383.8**

[1] Impacts that will occur only during construction. Temporarily impacted areas will be restored following construction and will be allowed to revegetate naturally (i.e., will not be further disturbed during Facility operation). This type of impact is considered a permanent impact in forested communities because regrowth of a forest canopy takes many years.

[2] Areas that will be cleared during Facility construction and maintained as early successional communities for the life of the Facility. Conversion of row croplands to perennial early successional communities, such as those that will be maintained adjacent to access roads, is expected to result in no impact or a positive impact, respectively, to vegetation and soil resources.

[3] Permanent impact will occur where existing plant communities are converted to built facilities (e.g., wind turbine foundation pedestals and associated gravel rings, access roads, the O&M building and parking area, meteorological tower foundation pedestals, and the collector substation and point of interconnection (POI) switchyard). Note: permanent conversion and permanent impact are "permanent" only in the sense that they are anticipated to last for the life of the Facility. During decommissioning, these permanently impacted areas, with the exception of the POI switchyard will be restored and the land will be available to revert back to its previous use, which could include agriculture.

3.12 Exhibit 12: NYS Threatened or Endangered Species

As a result of the changes to the Permitted Facility proposed in this permit modification request (Table 1), Facility impacts to state listed threatened or endangered grassland bird species occupied habitat would decrease substantially. These changes are described in greater detail in the revised Net Conservation Benefit Plan (NCBP; Appendix 12-I).

The changes to the Permitted Facility proposed in this permit modification request would not be expected to result in additional or new impacts to other state-listed species determined to be present within or near the Facility Site. The Proposed Facility would continue to maintain recommended distance buffers/setbacks from other state listed species occurrences discussed in the Determination issued by ORES on October 15, 2024.

Although the changes the Permit Holder is proposing as part of this permit modification request would result in some minor changes to the Facility's impacts, the Siting Permit contains conditions that adequately address the avoidance, minimization, and mitigation of impacts to threatened and endangered species, and these reductions do not substantively change the conclusions reached in Exhibit 12 of the Application.

3.13 Exhibit 13: Water Resources and Aquatic Ecology

3.13.1 Groundwater

The Proposed Facility is not anticipated to result in significant groundwater impacts to groundwater quality or quantity, or to any public drinking water supply wells, aquifer protection zones, or groundwater aquifers on or within a 1-mile radius of the Project. The Permit Holder will adhere to the requirements of 16 NYCRR Section 1100.6.4(n)(1) to conduct pre-and post-construction water quality testing of water wells on any non-participating properties within the specified boundaries to monitor for potential impacts (e.g., blasting, inadvertent returns). No impacts to well yields are expected as residential and community groundwater wells are generally assumed to be set deeper than the proposed wind turbine foundations and underground electrical collection lines. Furthermore, construction practices will adhere to the erosion and sediment control measures outlined in the Stormwater Pollution Prevention Plan (SWPPP), as well as the methods to prevent the discharge of hazardous material to the environment outlined in the Spill Prevention, Control and Countermeasures Plan, thus minimizing the potential for groundwater contamination.

3.13.2 Surface Waters

The Permitted Facility included impacts to 10 state-protected streams associated with access road construction, collection line installation, and minor construction activities. As outlined in Table 1 and Table 6, the Permit Holder is proposing to use HDD to avoid all state-protected stream impacts associated with collection line installation and open-bottomed culverts or bridges to avoid all state-protected stream impacts associated with access road installation (see also revised Figure 13-3). As such, no Stream Restoration and Mitigation Plan will be required for the Proposed Facility.

In addition to avoiding direct impacts to state-regulated surface waters, the Permit Holder has designed the Facility to minimize tree clearing and grading within 50 feet of state-protected streams. As outlined in Table 6 and revised Figure 13-3, the Proposed Facility would generally have the same level of indirect impacts to areas

within 50 feet of state-protected streams as the Permitted Facility; indirect impacts would be limited tree clearing, stump removal and grubbing, and grading and soil disturbance required for the installation of access roads, bridges, and underground collection lines. The impacts summarized in Table 6 are allowable activities that do not require mitigation in accordance with 16 NYCRR Section 1100-2.14(b)(7).

As the Proposed Layout does not include federally jurisdictional impacts to wetlands and streams, no Section 401 Water Quality Certification will be required for the Facility.

Table 4. Permitted and Proposed Direct and Indirect Impacts to State-Protected Surface Waters

Stream ID	Direct Impacts		Components within 50 Feet		Impacts Within 50 Feet					
					Tree Clearing		Stump Removal/Grubbing		Grading	
	Permitted	Proposed	Permitted	Proposed	Permitted	Proposed	Permitted	Proposed	Permitted	Proposed
10-ST006	No	No	--	Collection Line	No	Yes	No	Yes	No	No
12-ST008	Yes	No	Access Road	Access Road	No	Yes	No	Yes	Yes	Yes
12-ST015	Yes	No	Access Road; Collection Line	Access Road	No	No	No	No	Yes	Yes
12-ST016	Yes	No	Access Road; Collection Line	--	Yes	No	Yes	No	Yes	No
23-ST002A	Yes	No	Access Road; Collection Line	Collection Line	Yes	No	Yes	No	Yes	No
23-ST003A	Yes	No	Access Road; Collection Line	Collection Line	Yes	No	Yes	No	Yes	No
23-ST005	No	No	N/A[1]	--	Yes	No	Yes	No	No	No
23-ST004	No	No	--	N/A[1]	No	No	No	No	No	No
23-ST004A	Yes	No	Access Road; Collection Line	Collection Line	Yes	No	Yes	No	Yes	No
23-ST005	No	No	N/A[1]	--	No	No	No	No	No	No
23-ST006	Yes	No	Access Road; Collection Line	--	Yes	No	Yes	No	Yes	No
33-ST010	Yes	No	Access Road; Collection Line	Access Road; Collection Line	Yes	Yes	Yes	Yes	Yes	Yes
33-ST011	Yes	No	Access Road; Collection Line	Access Road; Collection Line	Yes	Yes	Yes	Yes	Yes	Yes
33-ST013	Yes	No	Access Road; Collection Line	Access Road; Collection Line	No	No	No	No	Yes	Yes
66-ST006	No	No	Collection Line	Collection Line	Yes	Yes	Yes	Yes	No	No
93-ST001	No	No	Collection Line	Collection Line	No	Yes	No	Yes	No	No
93-ST003A	No	No	Collection Line	Collection Line	Yes	No	Yes	No	No	No

[1] No Project components within 50 feet of the protected stream, however general construction activities will occur within 50 feet of the stream for other nearby Project components.

3.14 Exhibit 14: Wetlands

As a result of the changes proposed in this permit modification request (see Table 1), all major or intermediate impacts to NYS-jurisdictional wetlands have been avoided and major impacts to NYS-jurisdictional wetland regulated adjacent areas (RAAs) have been reduced. To avoid major and intermediate impacts to NYS-jurisdictional wetlands, infrastructure and disturbance were removed from the design or moved out of wetlands and into nearby upland areas—many of these nearby upland areas are RAAs. Therefore, although major and intermediate impacts to NYS-jurisdictional wetland have been avoided, intermediate and minor impacts to RAAs have increased. Impacts to NYS-jurisdictional wetlands and RAAs are detailed in Table 7, Table 8, and Table 9, and summarized below.

- NYS-jurisdictional Wetlands – Major impacts would decrease by 0.52 acres (100%), intermediate impacts would decrease by 0.79 acres (100%), and minor impacts would decrease from 0.04 acres to 0.03 acres (25%).
- RAAs – Major impacts would decrease by 0.4 acres (4%), intermediate impacts would increase by 1.21 acres (68%), and minor impacts would increase by 3.03 acres (55%).

The Proposed Facility will result in a 98% decrease in direct NYS-jurisdictional wetland impacts,[5] significantly reducing the Facility's impact on the functions and processes of NYS-jurisdictional wetlands in the vicinity of the Facility. As a result, the Permit Holder will no longer be required to develop mitigation for impacts to state-regulated wetlands. However, the Permit Holder will be required to mitigate 4.69 acres of unavoidable impacts to RAAs.[6] As the majority of these RAA impacts would be temporary, the Permit Holder is proposing mitigation in place and will implement the restoration practices outlined in the Uniform Standards and Condition and adhere to the erosion and sediment control and stormwater practices identified in the SWPPP (see revised Appendix 13-C). The Facility's revised Wetland Restoration and Mitigation Plan (Appendix 14-D) details how the Project will satisfy these mitigation requirements.

[5] The only proposed impact to NYS-jurisdictional wetlands is selective cutting of trees and shrubs associated with a temporary intersection improvement (see Tables 7 and 8). This impact is allowable and would not involve dredge or fill (i.e., federally jurisdictional impacts) in wetlands or streams.

[6] As detailed in Table 7 and 9 and revised Figure 14-2, all impacts to the RAA of wetland 26-W026 that require A(E) mitigation are setback at least 75 feet from this wetland. Therefore, no enhancements or mitigation is required for the 0.14 acre of major impacts proposed.

Table 5. Permitted and Proposed Impacts to State Jurisdictional Wetlands

Wetland ID	DEC Wetland ID	Mapped Class	Wetland Impacts (acres)	
			Permitted Facility	Proposed Facility
Wetlands				
05-W001	CA-11	2	0.32	0.00
12-W011	Unmapped	N/A	0.03	0.00
12-W013	Unmapped	N/A	0.01	0.00
12-W027	Unmapped	N/A	0.03	0.00
66-W003	Unmapped	N/A	0.19	0.00
66-W011	Unmapped	N/A	0.74	0.00
66-W016	Unmapped	N/A	0.03	0.00
93-W001	Unmapped	N/A	0.00	0.03[2]
Total			**1.35**	**0.03**
Adjacent Areas				
05-W001, 66-W019, & 66-W020[1]	CA-11	2	0.94	2.58
10-W001	MO-6	1	1.22	2.89
10-W008	Unmapped	N/A	0.36	0.52
12-W001	Unmapped	N/A	0.09	0.00
12-W011	Unmapped	N/A	1.07	1.27
12-W013	Unmapped	N/A	0.44	0.84
12-W027	Unmapped	N/A	1.64	1.51
12-W040	Unmapped	N/A	0.49	0.95
23-W002 & 93-W001[1]	Unmapped	N/A	0.66	1.03
26-W002	Unmapped	N/A	0.96	0.97
26-W019	Unmapped	N/A	1.38	1.77
26-W026	MO-5	2	0.00	0.15[3]
33-W003	Unmapped	N/A	0.56	0.49
33-W004	Unmapped	N/A	0.24	0.57
33-W005 & 33-W006[1]	Unmapped	N/A	1.04	1.34
33-W010	Unmapped	N/A	0.15	0.00
33-W028	Unmapped	N/A	0.00	0.32
66-W003	Unmapped	N/A	0.87	0.55
66-W004	Unmapped	N/A	0.58	0.24
66-W011	Unmapped	N/A	4.65	2.23
66-W016	Unmapped	N/A	0.78	1.38
93-W002	Unmapped	N/A	0.05	0.37
Total			**18.17**	**21.97**

[1] These wetlands are located proximal to each other, and their regulated adjacent areas overlap. Impacts to the regulated adjacent areas of these two or more wetlands are therefore being analyzed together.

[2] Proposed impacts would include only selective cutting of trees and shrubs. No dredge or fill is proposed in this wetland.

[3] Proposed major impacts are set back more than 75 feet from the boundaries of the wetland (see Table 8). Therefore, no enhancements or mitigation is required.

Table 6. Impacts to State-Regulated Wetlands Within the Facility Site

Delineation ID	Figure 14-2 Sheet Number	NYSDEC Mapped Wetland Class	NYSDEC Mapped Wetland ID	Wetland Impact				Mitigation Required[1]	Why Avoidance is Not Practicable[2]	Minimization Strategy
				Community Type	Activity Type	Impact Type	Impact Area (acres)			
93-W001	6	N/A	Unmapped	Palustrine Scrub Shrub Wetland	Minor	Selective cutting of trees and shrubs	0.03	A	The proposed turn improvement adjacent to this wetland is required to deliver wind turbines to T6, T-7, T-8, and T-10.	The Permit Holder will cut trees and shrubs in Wetland 93-W001 without heavy machinery and without causing any ground disturbance within the wetland.
Total A Impacts							**0.03**			
Total Impacts							**0.03**			

[1] Per 16 NYCRR 1100-2.15(g)(2)(i) of the Article VIII regulations: A = Allowed, no mitigation or enhancement required.

[2] Article VIII setback requirements dictate where wind turbine infrastructure may be placed on a parcel relative to where participating and non-participating properties, residences, and structures, public roadways, gas wells, substations, and above-ground electric systems exist; siting of the wind turbines and associated infrastructure must balance where sensitive resources exist, setback requirements, and landowner requests. Electrical engineering of a wind facility must be designed to accommodate power from individual turbines to the collection substation. Access roads are necessary for infrastructure maintenance and emergency response. Temporary work areas may be required to allow for construction and installation of Facility infrastructure.

Table 7. Impacts to State-Regulated Wetland Adjacent Areas Within the Facility Site

Delineation ID	Figure 14-2 Sheet Number	NYSDEC Mapped Wetland Class	NYSDEC Mapped Wetland ID	Adjacent Area Impact				Mitigation Required[1]	Why Avoidance is Not Practicable[2]	Minimization Strategy
				Community Type	Activity Type	Impact Type	Impact Area (acres)			
05-W001, 66-W019, & 66-W020[3]	8	2	CA-11	Successional shrubland, Successional Old Field, and Successional Northern Hardwoods	Major	Power Interconnections	0.49	A(E)	The location of the proposed collection substation and POI switchyard is the only location available to the Permit Holder that avoids direct wetland impacts at the location of the POI. The site is constrained by its small size, topography, and the presence of Wetlands 05-W001, 12-W049, 66-W020 and Stream 66-ST008. Although the Permit Holder was able to avoid impacts to all wetlands, major and minor activities in the RAA were unavoidable.	The Permit Holder has sited the collection substation and point of interconnection (POI) switchyard to avoid all wetland impacts and has compacted the size of the substation and switchyard and has incorporated other design elements to minimize impacts to RAAs to the greatest extent practicable.
				Successional Shrubland, Successional Old Field	Major	Other activities and structures integral to the project involving placement of fill	1.31	A(E)		
				Successional shrubland, Successional Old Field, and Successional Northern Hardwoods	Intermediate	Clearing and manipulation of undisturbed herbaceous and woody vegetation	0.78	A		
10-W001	20, 21	1	MO-6	Row Cropland	Major	Power Interconnections	0.57	A(E)	Morrisville Swamp (Wetland 10-W001) is a large palustrine forested wetland, portions of which have been converted to row cropland. This wetland bisects the Facility Site north to south. A power interconnection between the eastern and central portions of the Facility is necessary to carry power to the substation. Although the Permit Holder has avoided direct impacts to Wetland 10-W001, disturbance within its regulated adjacent area is unavoidable.	The Permit Holder is utilizing HDD to avoid all impacts to Wetland 10-W001. and has utilized the narrowest disturbance limits allowable within the regulated adjacent area, considering the applicable engineering constraints (e.g., work corridors necessary for trenching and cable installation). The Permit Holder considered placing the western bore pit for the proposed HDD crossing outside of the regulated adjacent area. However, this would result in a 70% increase in the length of the proposed boring. Considering the current use of the regulated adjacent area (row cropland) and the added inadvertent return risks associated with increasing the length of the bore, it was determined that the proposed approach was likely to be the least impactful overall.
				Row Cropland, Paved Road/Path	Minor	Grading and manipulation of disturbed areas	2.32	A(E)		

Delineation ID	Figure 14-2 Sheet Number	NYSDEC Mapped Wetland Class	NYSDEC Mapped Wetland ID	Adjacent Area Impact				Mitigation Required[1]	Why Avoidance is Not Practicable[2]	Minimization Strategy
				Community Type	Activity Type	Impact Type	Impact Area (acres)			
10-W008	19	N/A	Unmapped	Beech-maple Mesic Forest	Major	Access Road	0.05	A	Callahan Brook (Stream 10-ST006) and its associated wetland complex (inclusive of Wetland 10-W008) bisects the Facility Site parcels that connect T-16 to the rest of the Facility. A crossing of these features is unavoidable, and the Permit Holder has selected a crossing location that is the least impactful to state-regulated resources, all things considered.	The Permit Holder is utilizing HDD to avoid all impacts to Wetland 10-W008 and has utilized the narrowest disturbance limits allowable within the regulated adjacent area, considering the available access to the site and engineering constraints (e.g., work corridors necessary for trenching and cable installation). The Permit Holder considered placing the southern bore pit further to the south and outside of the regulated adjacent area. However, the area south of the proposed bore pit location contains steep slopes and gains elevation rapidly. The proposed southern bore pit location was ultimately selected as it minimizes topography variation along the length of the bore, reducing inadvertent return risks.
						Power Interconnections	0.09	A		
						Clearing of Forest	0.37	A		
				Paved Road/Path	Minor	Grading and manipulation of disturbed area	0.02	A		
12-W011	22, 23	N/A	Unmapped	Field Cropland, Row Cropland, Successional Old Field, and Successional Shrubland	Major	Access Roads	0.37	A	The access road crossing proposed by the Permit Holder is necessary to deliver wind turbines to the site. Considering the land currently controlled by the Permit Holder, no viable alternatives to this access road on parcel 111.-1-1 are available. As Wetland 12-W011 crosses parcel 111.-1-1 from east to west and the Permit Holder's access road must traverse the parcel from north to south to access US HWY 20. Although the Permit Holder has avoided direct impacts to Wetland 12-W011, disturbance within this wetland's regulated adjacent area is unavoidable.	To minimize impacts to Wetland 12-W011 and its regulated adjacent areas, the Permit Holder routed the proposed access road along a previously disturbed corridor associated with an existing farm road, utilizing existing culvert crossings and proposed open bottom culvert bridges to avoid direct wetland impacts. Impacts were further minimized by utilizing the narrowest disturbance limits allowable at the proposed wetland crossing, considering the applicable engineering constraints (e.g., grading, culvert installation, etc.).
				Successional Shrubland, Successional Northern Hardwoods	Intermediate	Clearing and manipulation of undisturbed herbaceous and woody vegetation	0.54	A		
				Field Cropland, Row Cropland, Successional Shrubland and Successional Old Field	Minor	Grading and manipulation of disturbed areas	0.35	A		
12-W013	9	N/A	Unmapped	Beech-maple Mesic Forest, Successional Spruce/Fir Plantation	Major	Power Interconnections	0.17	A	Wetland 12-W013 and other similar wetlands are located along all viable collection line routes available to the Permit Holder between T-8 and T-9. Although the Permit Holder is utilizing HDD to avoid direct impacts to Wetland 12-W013, this crossing is located in an inaccessible area; the required access to both sides of the proposed boring will require tree clearing and disturbance to Wetland 12-W013's regulated adjacent area.	The Permit Holder has selected the narrowest crossing point of Wetland 12-W013 and its regulated adjacent area and has utilized the narrowest disturbance limits allowable at the proposed wetland crossing, considering the applicable engineering constraints (e.g., work corridors necessary for HDD bore pits, trenching, and cable installation).
						Clearing of Forest	0.67	A		
12-W027	1, 2	N/A	Unmapped	Row Cropland, Paved Road/Path, Mowed Lawn, and Pastureland	Minor	Grading and manipulation of disturbed areas	1.51	A	The temporary laydown yard proposed by the Permit Holder in this location is necessary to construct the Facility. Unlike most other similarly sized potential laydown areas, the location selected requires relatively little grading and is amenable to the landowner. Considering these constraints, the Permit Holder was able to avoid all impacts to Wetland 12-W027. However, complete avoidance of the regulated adjacent area is not practicable as shifting the laydown yard and access road to the west and north would increase grading and infringe on agricultural land.	Impacts to regulated adjacent areas were minimized by siting all disturbance in areas regularly disturbed by farming practices. Considering the current land use within and in proximity to this wetland, the Permit Holder's proposed erosion and sediment controls will likely improve the functions and values of Wetland 12-W027 and its adjacent areas during construction.
12-W040	24	N/A	Unmapped	Successional Old Field, Successional Northern Hardwoods, and Successional Shrubland	Major	Access Roads	0.44	A	The proposed access road is necessary to deliver turbines to the site. The routing of this access road was developed in coordination with the landowner to utilize the existing farm road, avoid agricultural resources, and minimize grading to the greatest extent practicable. Considering these	Considering the site constraints (i.e., landowner requirements and minimizing impacts to farmland), the Permit Holder has minimized impacts by siting the access road to generally follow the existing farm road in previously disturbed areas. Impacts to Wetland 12-
						Clearing of Forest	0.26	A		

Delineation ID	Figure 14-2 Sheet Number	NYSDEC Mapped Wetland Class	NYSDEC Mapped Wetland ID	Adjacent Area Impact				Mitigation Required[1]	Why Avoidance is Not Practicable[2]	Minimization Strategy
				Community Type	Activity Type	Impact Type	Impact Area (acres)			
				Successional Old Field, Successional Shrubland	Intermediate	Clearing and manipulation of undisturbed herbaceous and woody vegetation	0.26	A	constraints, the Permit Holder was able to avoid all impacts to Wetland 12-W040. However, complete avoidance of the regulated adjacent area is not practicable as shifting the road to the northeast would increase grading and infringe on agricultural land.	W040 have been avoided and grading has been minimized by roughly following the 1370-foot contour.
23-W002 and 93-W001[3]	5, 6	N/A	Unmapped	Mowed Lawn with Trees, Successional Old Field, Successional Shrubland	Major	Power Interconnections	0.15	A	Wetland 23-W002 and 93-W001 and their regulated adjacent areas span the entirety of the parcels that connect T-3 and T-4 to the rest of the Facility. The Permit Holder is utilizing two HDD crossings to avoid direct impacts to Wetlands 23-W002 and 93-W001. However, avoidance of impacts to these features' regulated adjacent areas is not possible considering the Permit Holder's current land control and the applicable engineering constraints (e.g., work corridors necessary for HDD bore pits, trenching, and cable installation).	Impacts to Wetland 23-W002 and 93-W001 have been avoided completely through the use of HDD. Impacts to the regulated adjacent areas have been minimized by utilizing an existing driveway to access the northern central bore pit between Wetland 23-W002 and 93-W001. The Permit Holder considered shifting the southern bore pit for the Wetland 23-W002 crossing further to the south to avoid impacts to the regulated adjacent area; however, the area south of the currently proposed bore pit is the location of the landowner's septic system. The Permit Holder considered alternative locations for the northern bore pit for the Wetland 93-W001 crossing but there are no viable alternatives that are outside the regulated adjacent area.
				Successional Shrubland	Intermediate	Clearing and manipulation of undisturbed herbaceous and woody vegetation	0.28	A		
				Mowed Lawn with Trees, Paved Road/Path and Successional Old Field	Minor	Selective cutting of trees and shrubs	0.11	A		
						Grading and manipulation of disturbed areas	0.49	A		
26-W002	6, 7	N/A	Unmapped	Mowed Lawn, Successional Shrubland	Major	Power Interconnections	0.20	A	Wetland 26-W002 and its regulated adjacent area span the entirety of the parcel that connects T-3 and T-4 to the rest of the Facility. Although the Permit Holder was able to avoid impacts to Wetland 26-W002, avoidance of impacts to this wetland's regulated adjacent area is not possible considering the Permit Holder's current land control and the applicable engineering constraints (e.g., work corridors necessary for HDD bore pits, trenching, and cable installation).	Impacts to Wetland 26-W002 have been avoided completely through the use of HDD. The Permit Holder has minimized impacts to the regulated adjacent area by utilizing previously disturbed areas to the greatest extent practicable. The Permit Holder considered placing the northern bore pit for the proposed HDD crossing to the north, outside of the regulated adjacent area. However, this would almost triple the length of the proposed boring. Considering the primary community type of the impacted portions of the regulated adjacent area (mowed lawn) and the added inadvertent return risks associated with significantly increasing the length of the bore, it was determined that the proposed approach was likely to be the least impactful overall.
					Intermediate	Clearing and manipulation of undisturbed herbaceous and woody vegetation	0.26	A		
					Minor	Grading and manipulation of disturbed areas	0.51	A		
26-W019	12, 13	N/A	Unmapped	Beech-maple Mesic Forest	Major	Access Road	0.72	A	T-10 has been sited to avoid impacts to Wetland 26-W019, while also avoiding impacts to adjacent wetlands and streams, and steep slopes located to the south of the turbine. Shifting this turbine a sufficient distance to avoid impacts to this wetland's regulated adjacent area is not practicable, as it would result in direct impacts to wetlands or streams or place the turbine in a location that would not be suitable from a grading or wake/turbulence/turbine-to-turbine setback standpoint. In addition, the Permit Holder has completely avoided other	The Permit Holder has carefully designed the siting of T-10, its access road and the three collection line circuits in a manner that avoids all impacts to Wetland 26-W019 and adjacent wetlands and streams. Considering the siting constraints outlined and considering the available access to the site and engineering constraints (e.g., grading requirements, work corridors necessary for trenching and cable installation) the Permit Holder has minimized impacts to these regulated adjacent areas to the greatest extent practicable.
				Beech-maple Mesic Forest, Successional Northern Hardwoods	Major	Power Interconnections	0.12	A		

Delineation ID	Figure 14-2 Sheet Number	NYSDEC Mapped Wetland Class	NYSDEC Mapped Wetland ID	Adjacent Area Impact				Mitigation Required[1]	Why Avoidance is Not Practicable[2]	Minimization Strategy
				Community Type	Activity Type	Impact Type	Impact Area (acres)			
						Clearing of Forest	0.86	A	impacts to Wetland 26-W019; however, in order to avoid impacts to the regulated adjacent area, the three collection lines circuits and the access road to T-10 would need to be shifted approximately 100 feet to the southwest. This shift is not practicable as it would place the three circuits on a very steep side slope above a large beaver dam complex that, if delineated, would likely be found to be state-regulated. Although the current routing of these collection lines and the access road will result in impacts to the regulated adjacent area, it represents the least impactful design option.	
				Beech-maple Mesic Forest	Major	Other activities and structures integral to the project involving placement of fill	0.07	A		
26-W026	17, 18	2	MO-5	Beech-maple Mesic Forest, Successional Northern Hardwoods	Major	Access Road	0.06[5]	A(E)	Stream 26-ST003 and Wetland 26-W026 span the entirety of the parcel that connects T-13 to the rest of the Facility. Although the Permit Holder was able to avoid impacts to Wetland 26-W026, avoidance of impacts to this wetland's regulated adjacent area is not possible considering the available access to the site and engineering constraints (e.g., work corridors necessary for HDD bore pits, trenching, and cable installation).	The Permit Holder has avoided all impacts to Wetland 26-W026 and minimized impacts to the adjacent area by siting the majority of the collection circuit outside of the wetland's regulated adjacent area and by utilizing the narrowest disturbance limits possible, considering the available access to the site and engineering constraints (e.g., work corridors necessary for HDD bore pits, trenching, and cable installation). In addition, all A(E) impacts would occur more than 75 feet from the boundaries of wetland 26-W026.
						Clearing of Forest	0.08[5]			
				Paved Road/Path	Minor	Grading and manipulation of disturbed areas	0.02	A		
33-W003	4	N/A	Unmapped	Row Cropland, Successional Northern Hardwood Forest	Major	Power Interconnection	0.14	A	The collection line circuit has been sited to follow the edges of the existing active agricultural fields. This routing completely avoids impacts to Wetland 33-W003, and 33-W006. However, avoiding impacts to the regulated adjacent area of Wetland 33-003 would require the Permit Holder to shift the collection line nearer to Wetland 33-W006 and its regulated adjacent area, placing it in the middle of the agricultural field, resulting in additional impacts to active agricultural lands during construction. This route would be inferior to the current route, which uses the edges of existing fields, and is not a practicable alternative.	The Permit Holder has minimized impacts to Wetland 33-W003 by avoiding all impacts to Wetland 33-W003 and minimized impacts to the adjacent area by siting the collection circuit along the edges of active agricultural fields to avoiding tree clearing by utilizing the narrowest disturbance limits possible, considering the available access to the site and engineering constraints (e.g., work corridors necessary for trenching and cable installation).
				Successional Northern Hardwood Forest, Successional Shrubland	Major	Clearing of Forest	0.01	A		
				Row Cropland, Successional Northern Hardwood, and Successional Shrubland	Minor	Grading and manipulation of disturbed areas	0.34	A		
33-W004	25	N/A	Unmapped	Row Cropland, Field Cropland, Hemlock Northern Hardwood Forest, and Successional Shrubland	Major	Power Interconnections	0.11	A	The collection line circuit has been sited to follow an existing farm road along the edge of active agricultural fields. This routing completely avoids impacts to Wetland 33-W004. However, avoiding impacts to the regulated adjacent area would require the Permit Holder to shift the collection line to the northeast, placing it in the middle of the adjacent agricultural field. This route would be inferior to the current route, which uses an existing farm road, and is not a practicable alternative.	The Permit Holder has minimized impacts to Wetland 33-W004 and its regulated adjacent area by avoiding all impacts to Wetland 33-W004 and minimizing impacts to the adjacent area by siting the collection circuit along an existing farm road, avoiding tree clearing by utilizing the narrowest disturbance limits possible, considering the available access to the site and engineering constraints (e.g., work corridors necessary for trenching and cable installation), and by limiting disturbance to previously disturbed areas.
				Northern Hardwood Forest, Successional Shrubland	Major	Clearing of Forest	0.37	A		
				Row Cropland, Field Cropland, Hemlock Northern Hardwood Forest, Pastureland and Successional Shrubland	Minor	Grading and manipulation of disturbed areas	0.09	A		
33-W005 and 33-W006[3]	4	N/A	Unmapped	Row Cropland, Successional Northern Hardwoods	Major	Power Interconnections	0.30	A	The collection line circuit has been sited to the edge of an active agricultural field. This routing completely avoids impacts to Wetland 33-W005 and 33-W006. However,	The Permit Holder has minimized impacts to Wetland 33-W005 and 33-W006 and their regulated adjacent areas by avoiding all impacts to these wetlands and

Delineation ID	Figure 14-2 Sheet Number	NYSDEC Mapped Wetland Class	NYSDEC Mapped Wetland ID	Adjacent Area Impact				Mitigation Required[1]	Why Avoidance is Not Practicable[2]	Minimization Strategy
				Community Type	Activity Type	Impact Type	Impact Area (acres)			
				Successional Northern Hardwoods	Major	Clearing of Forest	0.09	A	avoiding impacts to the regulated adjacent area would require the Permit Holder to shift the collection line to the southeast, placing it in the middle of the agricultural field. This routing would be inferior to the current route, which minimizes agricultural impacts, and is not a practicable alternative.	minimizing impacts to the adjacent area by siting the collection circuit along the edge of an active agricultural field, avoiding tree clearing by utilizing the narrowest disturbance limits possible, considering the available access to the Site and engineering constraints (e.g., work corridors necessary for trenching and cable installation), and by limiting disturbance to previously disturbed areas.
				Row Cropland, Pastureland	Minor	Grading and manipulation of disturbed areas	0.95	A		
33-W028	3	N/A	Unmapped	Row Cropland, Pastureland	Major	Power Interconnections	0.05	A	The collection line circuit has been sited to the edge of an active agricultural field. This routing completely avoids impacts to Wetland 33-W028. However, avoiding impacts to the regulated adjacent area would require the Permit Holder to shift the collection line to the east, where it would pass through Wetland 33-W029 and through the middle of the agricultural field. This routing would be inferior to the current route, which minimizes agricultural impacts, and is not a practicable alternative.	The Permit Holder has minimized impacts to Wetland 33-W028 and its regulated adjacent area by avoiding all impacts to these wetlands and minimizing impacts to the adjacent area by siting the collection circuit along the edge of an active agricultural field, avoiding tree clearing by utilizing the narrowest disturbance limits possible, considering the available access to the Site and engineering constraints (e.g., work corridors necessary for trenching and cable installation), and by limiting disturbance to previously disturbed areas.
					Minor	Grading and manipulation of disturbed areas	0.28	A		
66-W003	10	N/A	Unmapped	Successional Spruce/Fir Plantation	Major	Power Interconnections	0.27	A	The Permit Holder has rerouted the access road to avoid Wetland 66-W003 and proposed a new HDD crossing of Wetland 66-W003 to avoid all direct impacts. The Permit holder considered moving the bore pits outside of the regulated adjacent area, however this would increase the bore length by five times.	The Permit Holder has minimized impacts to Wetland 66-W003 and its regulated adjacent area by avoiding all impacts to this wetland and minimizing impacts to the adjacent area by utilizing the narrowest disturbance limits allowable at the proposed crossing, considering the applicable engineering constraints (e.g., HDD bore pits, cable installation, etc.). Considering the added inadvertent return risks associated with significantly increasing the length of the bore, it was determined that the proposed approach was likely to be the least impactful overall.
				Beech-maple Mesic Forest, Successional Spruce/Fir Plantation	Major	Clearing of forest	0.29	A		
66-W004	11	N/A	Unmapped	Beech-maple Mesic Forest, Successional Spruce/Fir Plantation	Major	Other activities and structures integral to the project involving placement of fill	0.11	A	T-7 has been sited to avoid impacts to Wetland 66-W004, while also avoiding impacts to adjacent wetlands and streams. Shifting this turbine to the northeast to avoid impacts to this wetland's regulated adjacent area would be preferred by the Permit Holder, as it would avoid all impacts to this regulated adjacent area, shorten the access road and associated tree clearing, place the turbine in a more energetic location, and overall simplify construction. However, such a shift is not possible as it would place the turbine in a location that would not be suitable from a wake, turbulence, and setback standpoint.	The Permit Holder has carefully designed the siting of T-7 in a manner that avoids all impacts to Wetland 66-W004. Considering the siting constraints outlined and considering the available access to the site and engineering constraints (e.g., grading requirements and work areas necessary) the Permit Holder has minimized impacts to the regulated adjacent area to the greatest extent practicable.
						Clearing of forest	0.13	A		
66-W011	14, 15, 16	N/A	Unmapped	Successional Shrubland, Mowed Lawn, Spruce/Fir Plantation, and Field Cropland	Major	Power Interconnections	0.63	A	The Permit Holder has removed T-11 and the access road that impacted Wetland 66-W011. The Proposed Facility would avoid all direct impacts Wetland 66-W011. The Permit Holder considered shifting the northern portions of the collection circuits to T-12 further to the west to avoid impacts to regulated adjacent area located south of Mutton Hill Road; however, the presence of an Environmentally Sensitive Area just south of Mutton Hill Road and wetlands	HDD is being proposed for both primary crossings of Wetland 66-W011. Bore pits for HDD's were sited outside of upland forests in field cropland, successional shrubland, and spruce/fir plantations. In order to site bore pits completely outside of regulated adjacent areas, the bore lengths would nearly triple. Bore lengths were kept as short, where possible, to reduce the likelihood of inadvertent returns. Access to the bore pits
				Successional Shrubland, Spruce/Fir Plantation	Major	Clearing of forest	0.21	A		
				Successional Shrubland	Intermediate	Clearing and manipulation of undisturbed herbaceous and woody vegetation	0.87	A		

Delineation ID	Figure 14-2 Sheet Number	NYSDEC Mapped Wetland Class	NYSDEC Mapped Wetland ID	Adjacent Area Impact				Mitigation Required[1]	Why Avoidance is Not Practicable[2]	Minimization Strategy
				Community Type	Activity Type	Impact Type	Impact Area (acres)			
				Beech-maple Mesic Forest, Mowed Lawn, Field Cropland, Successional Northern Hardwoods, Successional Shrubland	Minor	Grading and manipulation of disturbed areas	0.52	A	and streams to the west, prevented any rerouting that would avoid impacts to the regulated adjacent area.	in between the two wetland fingers of Wetland 66-W011 will be over an existing farm road.
66-W016	2, 3	N/A	Unmapped	Pastureland, Paved Road/Path	Major	Access Roads	0.68	A	The Permit Holder is avoiding direct wetland impacts by utilizing an open-bottomed culvert for the access road crossing of Chittenango Creek and Wetland 66-W016. Chittenango Creek and its associated wetland complex flow along the southeast side of Wyss Road, bisecting the Facility Site. All routes to T-3 and T-4 that are available to the Permit Holder cross Chittenango Creek and Wetland 66-W016. Therefore, complete avoidance of Wetland 66-W016's regulated adjacent area is not possible.	Although a crossing through Wetland 66-W016's regulated adjacent area is unavoidable, this crossing is located at one of the narrowest points of this wetland and is located in an area that avoids the need for tree clearing. Impacts for the access road were further minimized by utilizing the narrowest disturbance limits allowable at the proposed wetland crossings, considering the applicable engineering constraints (e.g., grading, culvert installation, etc.). The Permit Holder also rerouted the collection line that previously crossed in this location, with permitted impacts in the regulated adjacent area.
				Row Cropland, Pastureland, Paved Road/Path	Minor	Grading and manipulation of disturbed areas	0.70	A		
93-W002	25	N/A	Unmapped	Successional Old Field	Major	Power Interconnections	0.09	A	The collection line circuit has been sited to the edge of existing active agricultural fields north of Wetland 93-W002. This routing completely avoids any forest clearing associated with the adjacent area of Wetland 93-W002. The small, impacted portion of the regulated adjacent area appears to receive regular vehicle traffic. Avoiding impacts to the regulated adjacent area would require the Permit Holder to shift the collection line to the north, potentially placing it further into the agricultural field and also reducing energy deliverability efficiency. This routing would be inferior to the current route, which will avoid substantive impacts to the regulated adjacent area, and is not a practicable alternative	The Permit Holder has carefully sited the collection line to avoid all impacts to Wetland 93-W002. Considering the options available to the Permit Holder, impacts to the regulated adjacent have been minimized to the greatest extent practicable.
					Minor	Grading and manipulation of disturbed areas	0.28	A		
Total A Impacts							**17.18**			
Total A(E) Impacts							**4.83**			
Total Impacts[4]							**22.01**			

[1] Per 16 NYCRR 1100-2.15(g)(2)(i) of the Article VIII regulations: A(E) = Allowed, enhancements and/or mitigation required (e.g., planting of adjacent area, mitigating hydrological change), A(E) = no enhancements or mitigation required with 75 foot or more setback, and A = Allowed, no mitigation or enhancement required.

[2] Section 94-c setback requirements dictate where wind turbine infrastructure may be placed on a parcel relative to where participating and non-participating properties, residences, and structures, public roadways, gas wells, substations, and above-ground electric systems exist; siting of the wind turbines and associated infrastructure must balance where sensitive resources exist, setback requirements, and landowner requests. Electrical engineering of a wind facility must be designed to accommodate power from individual turbines to the collection substation. Access roads are necessary for infrastructure maintenance and emergency response. Temporary work areas may be required to allow for construction and installation of Facility infrastructure.

[3] These wetlands are located proximal to each other, and their regulated adjacent areas overlap. Impacts to the regulated adjacent areas of these two or more wetlands are therefore being analyzed together.

[4] Total impacts in this table differ from Table 7 due to rounding of individual impact areas before combining for total acreage.

[5] Proposed major impacts are set back more than 75 feet from the boundaries of the wetland. Therefore, no enhancements or mitigation is required, and this wetland is not included in the Wetland Restoration and Mitigation Plan (revised Appendix 14-D.

3.15 Exhibit 15: Agricultural Resources

Construction and operation of the Facility will result in three distinct types of impacts to agriculture: temporary impacts during construction, temporary impacts during operation, and permanent impacts. Potential impacts to agricultural land that could result from Facility construction and operation have been calculated for both the Permitted Layout and Proposed Layout and are summarized in Table 10 (see also Figure 15-7). During the operation of the Proposed Facility only 5% of active agricultural lands within the Facility Site (71.3 acres) will be taken out of agricultural production—a 22% reduction when compared to the Permitted Facility. Construction of the Proposed Facility would result in 122.2 acres of active agricultural land temporarily taken out of production during construction. However, these areas will be restored in accordance with the NYSAGM Guidelines and agricultural production will be allowed to resume post-construction. No permanent impacts to active agricultural land are proposed.

As shown in Table 10 and discussed elsewhere in this section, impacts to active agricultural land, mineral soil groups 1 through 4 (MSG 1-4),[7] and active agricultural land in MSG 1-4 have generally been reduced.

- Active Agricultural Land: When the Proposed Facility is compared to the Permitted Facility, temporary impacts during construction would generally stay the same, temporary impacts during operation would decrease by 20.3 acres (22.2%), and permanent impacts would remain the same (0.0 acres).

- MSG 1-4: Approximately 31% of the Permitted Facility and 30% of the Proposed Facility are classified as having MSG 1-4. When the Proposed Facility is compared to the Permitted Facility, temporary impacts during construction would decrease by 6.5 acres (6.3%), temporary impacts during operation would decrease by 3.8 acres (7.9%), and permanent impacts would remain the same (0.1 acre).

- Active Agricultural Land within MSG 1-4: When the Proposed Facility is compared to the Permitted Facility, temporary impacts during construction would decrease by 2.6 acres (4.5%), temporary impacts during operation would decrease by 3.5 acres (11.0%), and permanent impacts would remain the same (0.0 acre).

Although the changes the Permit Holder is proposing as part of this permit modification request would result in some reductions to the Facility's impacts on agricultural resources, considering the scope of these changes and the protective measures the Permit Holder has committed to in the Agricultural Plan (Appendix 15-A to the Application), the conclusions reached in Exhibit 15 of the Application remain applicable.

[7] Mineral soil groups 1 through 4 (MSG 1-4) are classified by the New York State Department of Agriculture and Markets (NYSAGM) and represent the best soils for agricultural production in New York State.

Table 8. Impacts to Agricultural Production Areas and Mineral Soil Groups

Agricultural Area	Permitted Facility					Proposed Facility				
	Perm Impact[1] (acres)	Temp Impact During Construction[2] (acres)	Temp Impact During Operations[3] (acres)	No Impact (acres)	Total (acres)	Perm Impact[1] (acres)	Temp Impact During Construction[2] (acres)	Temp Impact During Operations[3] (acres)	No Impact (acres)	Total (acres)
Land Use										
Annual Row Crops	0.0	89.6	63.7	892.3	1,045.7	0.0	87.6	50.3	848.0	985.9
Perennial Field Crops	0.0	19.7	17.0	265.3	301.8	0.0	20.5	13.2	229.4	263.1
Pastureland	0.0	12.2	10.9	183.8	207.0	0.0	14.1	7.8	141.3	163.2
Total	**0.0**	**121.4**	**91.6**	**1,341.4**	1,554.4	**0.0**	**122.2**	**71.3**	1218.7	**1,412.2**
Mineral Soil Groups										
Group 1	0.0	0.7	0.3	14.3	15.3	0.0	0.5	0.0	13.0	13.5
Group 2	0.0	56.4	25.2	570.6	652.2	0.0	53.2	24.5	588.5	666.2
Group 3	0.1	23.7	9.6	219.9	253.3	0.1	19.9	8.6	192.7	221.3
Group 4	0.0	21.9	12.6	239.4	273.9	0.0	22.6	10.9	225.6	259.1
Total	**0.1**	**102.7**	**47.8**	**1,044.1**	**1,194.7**	**0.1**	**96.2**	**44.0**	**1,019.9**	**1,160.1**
Groups 5-10	1.4	170.9	102.2	2,427.4	2,701.9	1.1	162.7	82.0	2,447.0	2,692.9
Active Agricultural Land in Mineral Soil Groups 1-4										
Annual Row Crops	0.0	45.4	21.6	409.4	476.3	0.0	42.8	20.0	398.2	461.0
Perennial Field Crops	0.0	8.0	5.9	102.9	116.8	0.0	7.4	5.4	87.1	99.9
Pastureland	0.0	4.3	4.4	53.8	62.6	0.0	4.9	3.0	46.3	54.2
Total	**0.0**	**57.7**	**31.9**	**566.1**	**655.7**	**0.0**	**55.1**	**28.4**	**531.6**	**615.1**

[1] Areas impacted by the Facility that will permanently be taken out of agricultural production and agricultural production will not be capable of resuming post-decommissioning (i.e., the POI, which will be transferred to NYSEG following construction).

[2]Temporarily impacted areas will be restored post-construction and will return to agricultural use (e.g., collection line corridors in agricultural areas).

[3] Areas that will be cleared during Facility construction and maintained as early successional communities for the life of the Facility. Conversion of active row croplands to perennial early successional communities, such as those that will be maintained under overhead collection line ROWs, is expected to result in a net benefit to wildlife and soil resources.

3.16 Exhibit 16: Effect on Transportation

The changes the Permit Holder is proposing as part of this Minor Permit Modification would not affect the general conclusions reached in the original Application regarding the effect on transportation. The majority of traffic-related impacts associated with the Proposed Facility will occur during the site preparation and construction phase when there will be a temporary increase in vehicle traffic on area roadways. Once the Facility is commissioned and construction activities are concluded, traffic associated with Facility operation will be negligible and limited to occasional trips associated with routine maintenance activities.

No mitigation measures for traffic or transportation impacts are proposed at this time due to the suitable conditions of proposed access routes, and no capacity improvements (e.g., traffic control devices) are projected to be required to accommodate the operation of the Facility as traffic volume is not expected to significantly increase. Thus, the Proposed Facility is not expected to result in any adverse traffic or transportation-related impacts on roadways within the vicinity of the Facility Site.

Final transportation routing developed in consultation with the New York State Department of Transportation, Madison County Highway Department, and representatives from the Towns of Eaton, Fenner, Nelson, and Smithfield will avoid and minimize safety issues associated with the use of the approved haul routes in accordance with 16 NYCRR §1100-6.3(c). If damage to local, county, or state roads occurs as a result of Facility construction, the Permit Holder will make repairs in accordance with the final Agreement for Road Use, Repair, and Improvements developed in consultation with the appropriate municipality.

3.17 Exhibit 17: Consistency with Energy Planning Objectives

As described in this permit modification request, when compared to the Permitted Facility, the Proposed Facility will add an additional 9.8 MW of clean, green, New York-based renewable power into the grid, while eliminating six turbines and reducing impacts to environmental resources. The Proposed Facility will be a beneficial addition to the State's electric generation capacity and advance important objectives of various state energy policies. The Proposed Facility will play a key role in advancing this market transformation and signify the responsiveness of the private sector to the State's articulated goals and promised reforms. The Facility also will protect New York's natural resources by avoiding substantive impacts to state-regulated wetlands and streams and their regulated adjacent areas, aid in public health protection efforts to reduce air pollution from the energy sector, help grow clean energy innovation, and create new jobs and business opportunities.

3.18 Exhibit 18: Socioeconomic Effects

The change that the Permit Holder is proposing as part of this permit modification request would not affect the general conclusions reached in Exhibit 18 of the Application. The Proposed Facility is anticipated to have local, countywide, and statewide economic benefits, including job creation, purchases of local materials and services, annual lease and easement payments, and direct revenue to the Towns of Nelson, Fenner, Eaton, and Smithfield, Cazenovia Central and Morrisville-Eaton Central School Districts, Cazenovia, Smithfield, and Morrisville Fire Districts, and Madison County in the form of Payment in Lieu of Taxes (PILOT) Agreement and Host Community Agreements (HCA). The Permit Holder is also planning to provide an annual fund through a proposed shared

community payment program to benefit neighbors of the Facility. Additionally, income generated from direct employment during the construction and operation phases of the proposed Facility will be used to purchase community goods and services, further expanding the local economy.

The changes proposed in this permit modification request would remove six turbines from the Facility's layout and design while increasing the nameplate capacity of the Facility from 100 to 109.8 MW. This change would increase the Facility's overall socioeconomic benefits (e.g., PILOT and HCA payments) while reducing impacts. For example, as a result of the changes proposed in this permit modification request, the number of turbines in the Town of Fenner would be reduced from 12 to nine, while the installed capacity in the Town of Fenner would increase from 54 to 54.9. The Permit Holder is in the process of negotiating and finalizing PILOT and HCA agreements with the four Towns, school districts, fire districts, and County. The HCA and PILOT payments will be finalized as part of pre-construction compliance filings.

3.19 Exhibit 19: Environmental Justice

The change that the Permit Holder is proposing as part of this permit modification request would not affect the general conclusions included in Exhibit 19 of the Application. Construction and operation of the Proposed Facility are not anticipated to create any disproportionate adverse environmental impacts to potential environmental justice areas. The Permit Holder will adhere to facility construction and maintenance requirements including 16 NYCRR Section 1101-3.4(j) to minimize air emissions during construction and 16 NYCRR Section 1101-3.4(k) to minimize noise impacts during construction.

3.20 Exhibit 20: Effect on Communications

The Permit Holder is proposing no changes to the location of T-6 as part of this permit modification request. The Permit Holder will develop a Construction Mitigation Plan prior to the start of construction to avoid adverse, non-temporary effects resulting from microwave interference proximal to T-6.

To support the removal of the six turbines proposed in this permit modification request (see Table 1), the Permit Holder completed updates to the AM and FM Radio Report (Appendix 20-A), the Off-Air TV Analysis (Appendix 20-B), the Mobile Phone Report (Appendix 20-C), the Microwave Study (Appendix 20-D), the Land Mobile and Emergency Services Report (Appendix 20-E), the Doppler Radar Report (Appendix 20-F), and the Amateur Radio Report (Appendix 20-H).

The changes the Permit Holder is proposing as part of this permit modification request would not affect the general conclusions reached in the original Application regarding the effect on communications. Based on the conclusions reached in revised Appendices 20-A, 20-B, 20-C, 20-D, 20-E, 20-F and 20-H, construction and operation of the Proposed Facility is not anticipated to result in new or adverse effects on the existing communication systems. Furthermore, the Permit Holder will construct the Facility to avoid interference with all existing utility systems.

3.21 Exhibit 21: Electric System Effects and Interconnection

The changes the Permit Holder is proposing as part of this permit modification request would not affect the general conclusions reached in the original Application regarding electrical system effects and interconnection.

3.22 Exhibit 22: Electric and Magnetic Fields

The Permit Holder completed additional electric and magnetic field (EMF) studies to evaluate the proposed location of the collection substation and POI switchyard. The revised EMF study found the Proposed Facility complies with all applicable EMF guidelines and standards (see revised Appendix 22-A). The changes the Permit Holder is proposing as part of this permit modification request would not affect the general conclusions reached in the original Application regarding electric and magnetic fields.

3.23 Exhibit 23: Site Restoration and Decommissioning

The Decommissioning and Site Restoration Plan was updated to reflect the decommissioning costs for the Proposed Facility. Overall, the approach to decommissioning is consistent with the Siting Permit. The changes proposed in this permit modification request will not result in a change to the methods, environmental impact, aesthetics, recycling, potential future use of the site, funding, or schedule of the decommissioning activities described in the Decommissioning Plan. The Permit Holder is committed to decommissioning and restoring the Facility in a safe and environmentally responsible manner and will decommission the Facility in accordance with applicable health and safety standards. The final Decommissioning Plan has been provided to ORES as a pre-construction compliance filing.

3.24 Exhibit 24: Local Laws and Ordinances

The changes that the Permit Holder is proposing as part of this permit modification request will not affect the general conclusions included in Exhibit 24 of the Siting Permit Application. Generally, the Permit Holder designed the Facility to comply with substantive requirements of local laws and regulations. The Permit Holder is not requesting any additional local law waivers with this permit modification beyond those granted by the Permit.

3.25 Exhibit 25: Other Permits and Approvals

As discussed in this permit modification request, the Proposed Facility avoids all federally jurisdictional impacts to wetlands and streams and otherwise avoids, minimizes, and mitigates impacts to key environmental resources. Table 11 identifies other permits and approvals that are required to construct and operate the Facility.

Table 9. Federal or Federally Delegated Permits, Consents, Approvals, or Licenses Required for Facility Construction and Operation

Permit/Consultation	Trigger	Comments	Timeline
Federal Aviation Administration (FAA)			
Notice of Proposed Construction or Alteration (7460-1)	Requirement to file under 14 CFR Part 77		Filed with FAA on August 24, 2023. Determinations of No Hazard received from the FAA on November 18, 2025.
Notice of Actual Construction (7460-2), Part 1	Requirement to file under 14 CFR Part 77		Notice of Actual Construction will be filed with the FAA in accordance with the Determinations of No Hazard received from the FAA.
State Pollutant Discharge Elimination System (SPDES)			
Article 17 of the Environmental Conservation Law (ECL)	Potential discharges of pollutants in the violation of water quality standard.	Performance criteria outlined in the July 2024 New York State Stormwater Management Design Manual.	Prior to commencement of construction (approximately 60 days) a Notice of Intent for Stormwater Discharges from Construction Activity will be submitted to NYSDEC, along with an updated version of the SWPPP, to seek coverage under the most recent State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges.