Exhibit 14: Wetlands
Attachment A: Overhead Collection Line Routing Evaluation

In response to the Notice of Incomplete Application (NOIA) submitted by the Office of Renewable Energy Siting (ORES) on March 28, 2022, ConnectGen Chautauqua County LLC (the Applicant) has developed the following narrative to supplement Exhibit 14 regarding the engineering justification and alternatives evaluation for the siting of overhead collection line routes through State-regulated wetlands.

The NOIA states:

4. *Please supplement Exhibit 14 to include evaluation of potential alternative routes for the overhead collection line, and additional discussion of avoidance or minimization measures for wetlands 25 and 46.*

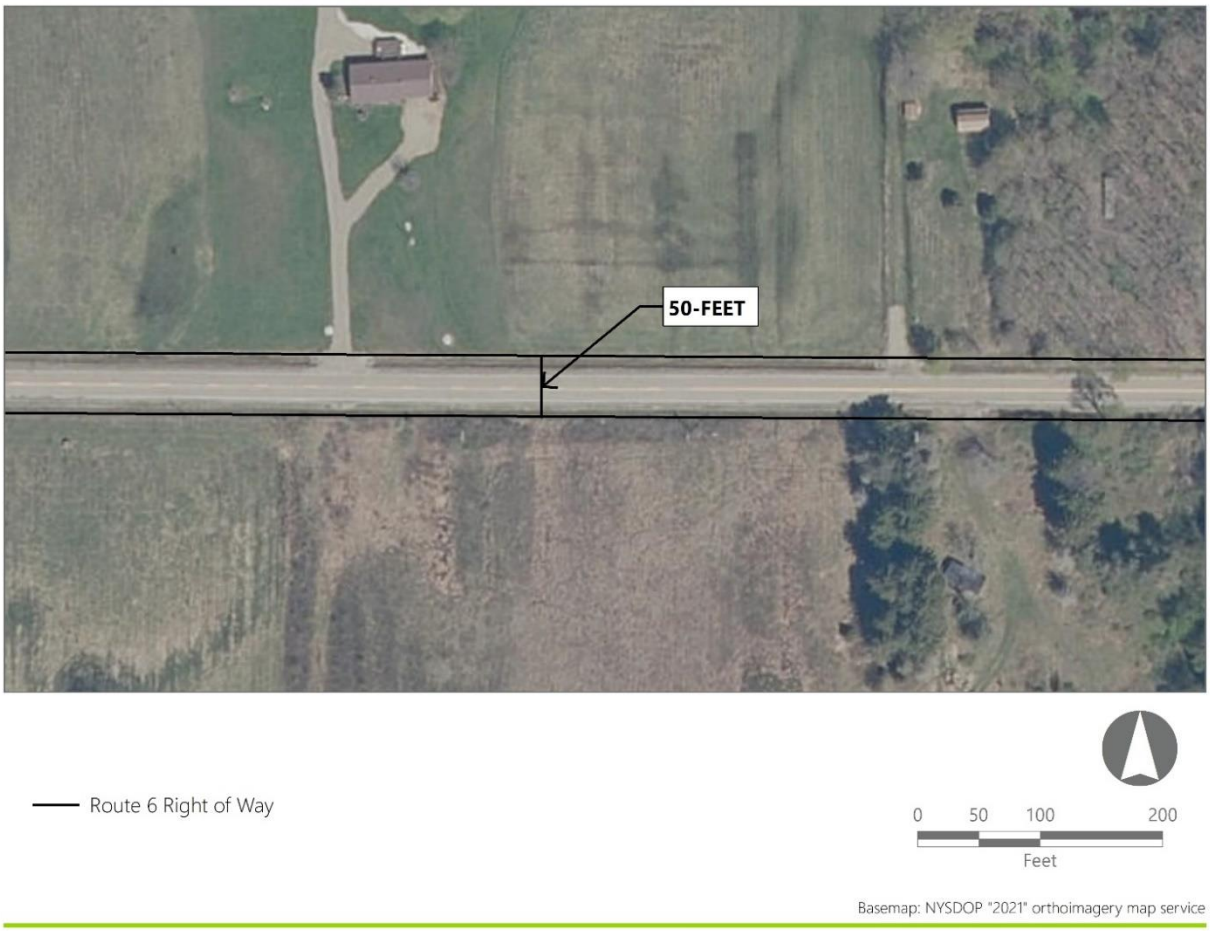
A summary providing additional discussion regarding the siting and design of the approximately 4.5 miles of overhead collection line is provided below. This discussion clarifies or expands on information provided in various exhibits, including Exhibits 8, 11, 13, 14, and 15, regarding the Applicant's approach to avoid and minimize impacts associated with siting and design of the Facility.

The Applicant considered various engineering and environmental factors in the siting and design of the Facility's proposed electrical collection system, with the intent to design a system that avoids and minimizes overall impacts to the natural, cultural, and human environments, considers available land siting opportunities and landowner agreements, and utilizes technical design parameters required for the Facility. This approach resulted in a combination of underground and overhead electric collection lines, including an approximately 4.5-mile length of overhead collection line route that consolidates the electrical collection circuits required to interconnect the Facility into a single 75-foot-wide right of way.

The overhead collection approach allowed for the consolidation of at least 7 electric line circuits, significantly minimizing the amount of grading and ground disturbance when compared to traditional underground collection line installation. The general location of the overhead line and the proposed 75-foot-wide right of way, situated on the south side of the Facility Area, was determined to be the only feasible location for siting the infrastructure based on land use and landowner approved siting opportunities. No other feasible alternative siting opportunities were identified by the Applicant or stakeholders during development of the Facility. Based on the siting and design requirements of the Facility, alternative options would not be feasible without adding extreme circuity to the route, thereby increasing both environmental impacts and costs, and requiring additional landowner participation that is currently not feasible due to a lack of site control for potential alternative routes.

Alternative locations for the above ground collection line, such as along Route 6, do not present a feasible siting opportunity. Route 6, in particular, is a publicly maintained road right-of-way of approximately 50 feet in width.

Figure 1: Existing Route 6 Road ROW



Because the Facility would require a minimum 75-foot-wide right of way for its overhead electric collection, this existing, occupied, public road right-of-way is not wide enough to host Facility components, and any partial occupancy of the right-of-way would result in direct interference with the existing use of the right-of-way for transportation. Siting directly adjacent to but outside of the Route 6 road right-of-way is also infeasible due to site control limitations and conflicts with existing land use. Although existing utility lines are located adjacent to the road right-of-way, these distribution-level electric lines currently serve rural residences located along Route 6. Upgrading these facilities to co-locate with Facility collection lines would be unreasonable and infeasible. A collocated design would require structures to be significantly taller to combine existing distribution circuits and the Facility's collection line circuits. In order to conform with National Electric Safety Code (NESC) design standards, a larger right-of-way would be required

than what currently exists along Route 6. Importantly, siting along Route 6, whether within the existing right-of-way or an expanded right-of-way, would require right-of-way authorization by non-participating parcel owners along this route and the local distribution utility.

Notwithstanding feasibility limitations, siting taller structures along Route 6 would result in increased visual contrast with the existing environment. At a minimum, this would result in an increased visual impact (and currently unanticipated construction impact/disturbance) directly experienced by the over 35 occupied residences located along the road's right-of-way. New infrastructure along Route 6 would potentially increase impacts to the South Ripley Cemetery, one of the two major historical resources identified within the Facility Site. Lastly, any modification to the existing distribution system would require intermittent outages for the local community during construction of updated co-located structures.

A number of iterative changes were made to the Facility Layout throughout the design process in order to avoid and minimize impacts to State-regulated freshwater wetlands and regulated adjacent areas (RAAs). Please see Appendix 11-E of the Application for a description of the iterative steps of Facility layout design and the impacts avoided or minimized by changes in design and loss of solar capacity. Extensive reviews of the Facility design and subsequent modifications were completed with specific priority given to the avoidance of wetland impacts.

As described in Exhibit 14(f) of the Application, Measures to Minimize Wetland Impacts, impacts to state-regulated wetlands and adjacent areas have been avoided in multiple locations by locating Facility components outside of state-jurisdictional wetlands and regulated adjacent areas where possible. Ground disturbance in wetlands related to collection lines will be largely avoided by utilizing trenchless installation technologies, such as boring underneath the wetland as described in Exhibit 14 and depicted in Appendix 5-B, Electrical Design Drawings, and Appendix 14-C, Wetland and Stream Impact Drawings.

However, in certain situations, where crossing wetlands is unavoidable due to other environmental and engineering constraints, and underground boring is not a feasible option, overhead collections lines present an opportunity to significantly reduce ground disturbance related wetland impacts. For example, a 4.5-mile-long overhead collection line span is sited in the southern portion of the Facility Site where several large, forested wetland features, specifically Wetland 46 and Wetland 025 (both part of NYSDEC Mapped Wetland SR8) are unavoidable. Trenchless installation is typically not feasible at distances greater than 1,000 feet due to limitations on bore size, cable pulling, and above ground access to collection lines. Therefore, given the width of the wetland features at the crossing locations (1,244 feet at Wetland 46 and 1,073 feet at Wetland 025) trenchless installation is not feasible along the collection route. Additionally, based on feedback from participating landowners and a review of collection siting opportunities, the proposed route was identified as the only location in which electrical collection lines could connect the eastern and western portions of the Facility. The landowners also specified

that the Applicant could utilize up to a 75-foot-wide collection line easement right-of-way to avoid or minimize impacts to the landowners' current land use.

In order to accommodate all the circuits required along this route, underground collection installation would result in a width of ground disturbance in excess of 100 feet along the route, while the overhead siting solution only requires an approximately 75-foot easement width at most locations. Ground disturbance due to the construction of the overhead collection lines would be limited to the discrete locations of support structures only, whereas underground collection would require more extensive linear excavation and grubbing, and additional tree clearing, to accommodate each cable circuit. Therefore, siting an overhead collection line across forested wetland features reduces the overall extent of wetland impacts. Additionally, during the design process, the Applicant iteratively sited the discrete pole locations and span lengths of the overhead line to minimize wetland impacts, such as to Wetlands 46, 111, and 012, making every reasonable effort to reduce potential soil disturbance as noted in the Application in Exhibit 14(f). Finally, by maintaining a single overhead route, the Applicant would avoid up to six overhead-to-underground transition points along this span, an alternative that would otherwise result in electrical losses and increased costs, as well as more significant ground disturbance.

The Applicant's efforts to avoid and minimize impacts to wetlands and adjacent areas are inherently captured in the proposed collection line location and design. The Applicant has taken all practicable means to site the collection line facility in a location that results in the least impacts, which is also the only feasible location available for the Facility due to site control. The above-ground design avoids impacts associated with greater ground disturbance and more tree clearing than would be required for buried collection lines. The selected route centerline was micro-sited within the available Facility Area in order to cross wetlands at the narrowest point possible, and structure locations were sited in upland areas to the greatest extent practicable based on the structure design and span length requirements.

Lastly, the Applicant has committed to construction activities that incorporate temporary matting and low-ground disturbance best management practices in order to further minimize disturbance during the construction process. Through siting, design and proposed construction practices, the Applicant has demonstrated all practicable efforts to avoid and minimize wetland impacts as described in Section 900-2.15(f)(1-4).