EAST POINT ENERGY CENTER

Case No. 17-F-0599

1001.9 Exhibit 9

Alternatives

Contents

Figure

Exhibit 9: Alternatives

This Exhibit will track the requirements of proposed Stipulation 9, dated August 20, 2019, and therefore, the requirements of 16 NYCRR § 1001.9.

9(a) Applicable, Reasonable, and Available Alternative Location Sites

The Article 10 regulations require that this Exhibit shall contain "an identification and description of reasonable and available alternative location sites for the proposed facility." In determining the scope of alternatives to be considered, the emphasis is on what is reasonable, and considers the fact that a Private Facility Applicant is limited to sites that are owned by, or under option to, the private facility applicant (or its affiliates). A Private Facility Applicant is also defined in 16 NYCRR 1000.2(ae) as an applicant that lacks the power of eminent domain. The Applicant does not have eminent domain authority and therefore is only required to describe reasonable and available sites that are owned by or under option to the Applicant.

This alternatives analysis is limited to property under the Applicant's control (i.e., solar option, solar lease, or ownership). As previously noted, the Applicant is a wholly-owned, indirect subsidiary of NextEra, which does have affiliates with other sites under control. However, many of the sites under the control of the Applicant's affiliates are already being considered for placement of other solar generating facilities; therefore, the Applicant does not have control of other sites that may reasonably be considered for this Project. The sites under the control of Applicant's affiliates that are not being considered for solar development are not suitable for solar projects and instead are currently being developed for other types of projects. Furthermore, the Project at this site was selected by NYSERDA to enter into agreement to sell renewable energy credits as a result of its 2017 solicitation of utility scale, renewable energy projects, as part of the NYPSC's and NYSERDA's efforts to achieve the goals in the 2015 State Energy Plan (SEP) and the NYPSC's adopted Clean Energy Standard. Since then, the Climate Leadership and Community Protection Act (CL&CPA) has been enacted, setting more exacting and aggressive renewable goals, to which this Project will timely contribute. See Exhibit 10 for a more detailed discussion of the State's clean energy laws and programs.

Preliminary selection of solar energy locations, including the location of the proposed Project, is driven by many essential operational factors, both technical and economical. East Point Energy Center selected the Project Area based on the following primary factors:

- Availability of the solar resource – Review of the available solar energy resource in New York State was evaluated using state databases and preliminary modeling to determine the availability and anticipated productivity of the Project in the Project Area. The Project Area was identified as having a strong solar resource.

- Available land from willing landowners – East Point Energy Center has partnered with multiple willing landowners to develop the Project Area and has sufficient acreage of suitable land for development of a 50 MW project.

- Relative ease of accessing the Project Area – The Project is easily accessible off of Route 20 and other existing roadways. The parcels that make up the Project Area are in relative proximity to one another in three main groups, allowing for sharing of access roads, limiting the need for off-site features, and consolidating Project impacts to a more defined area.

- Relative ease of connecting to the existing electric transmission grid – The Project will connect to the existing Sharon – Marshville 69 kV transmission line. This existing line feeds directly into the existing Sharon substation, which is easily accessible off of Route 20. In addition, the transmission segment required to connect the Project's collector substation to the existing substation is minimal at approximately 50 feet.

- Sufficient available capacity on the grid – A System Reliability Impact Study (SRIS; see Appendix 5-1) indicated that the existing Sharon – Marshville 69 kV transmission line and the existing Sharon substation have the required available capacity to support the Project.

The general arrangement and layout of the Project within the Project Area, as well as the technology selected and scale and magnitude of the Project, was refined based on input from stakeholders and based upon the results of key resource studies and environmental impact assessments. These additional factors, including the No Build Alternative, are described further below in Section 9(c).

9(b) Description and Evaluation of Comparative Advantages and Disadvantages of Proposed and Alternative Locations

As described in Section 9(a) above, the Applicant does not own or have under option any other sites in New York that could be considered reasonable and available for this Project. Therefore, this Section is not applicable.

9(c) Description and Evaluation of Reasonable Alternatives at the Primary Proposed Location

Based on results of the Feasibility Study, the SRIS (see Appendix 5-1), the anticipated transmission system capacity available in the area near participating landowners, and the NYSERDA solicitation, the Project has been designed for a nameplate capacity of 50 MW. Therefore, the objective of the Project is to construct a solar energy generating facility that can produce up to 50 MW of renewable energy at the Project Area.

The initial Project Area, as described in the November 2017 Public Involvement Program (PIP) Plan consisted of 783 acres in the Town of Sharon, which was based on preliminary estimates of where Project Components could be located due to known constraints. The targeted area was in proximity to the Project's proposed point of interconnection (POI), the Sharon – Marshville 69 kV transmission line, and suitable due to the Applicant's solar resource estimates. As a result of the Applicant's public outreach efforts, discussions, and input from several stakeholders (including landowners and Town officials), and further investigation and study of the local area, the Project Area was expanded to a size of 1,313 acres within the Town of Sharon. As a result, the addition of 530 acres to the Project Area allowed for greater flexibility to site Project Components while accounting for input from the public, consideration of local zoning requirements, and site constraints such as topography and environmentally sensitive areas.

Early alternative arrangements within the Project Area were eliminated due to environmental, engineering, or setback requirements. Based upon the evaluations and studies performed as part of the Application, the Applicant determined that there were two options for the Project layout within the Project Area that were viable. This Exhibit evaluates those two options (the Proposed Layout and the Alternate Layout) and describes why the Proposed Layout was selected over the Alternate Layout, as the preferred Project design. The Proposed Layout is shown in the Preliminary Design Drawings (Appendix 11-1) and evaluated throughout this application as the selected layout. Figure 9-1 includes the Alternate Layout considered for the Project. Additionally, several photosimulations of the Alternative Layout (and the Proposed Layout) were prepared and evaluated in the Visual Impact Assessment included in Exhibit 24; see Appendix 24-1.

The following subsections describe and evaluate multiple factors considered in the design of the Project at the Project Area.

(1) General Arrangement and Design

Preliminary selection of panel locations was driven by many essential operational factors, both technical and economical, and which are unique to siting commercial-scale solar energy projects. The arrangement of Project Components within the 1,313-acre Project Area considered existing environmental (e.g., avoidance and minimization of impacts to wetlands) and engineering constraints in the area, such as slopes, geography, elevation, topography, as well as a number of other variables as described within the supporting exhibits of this Application.

As part of the evaluation of general arrangement and design, the Applicant evaluated the feasibility of siting Project Components on each of the parcels for which landowner agreements are in place. Once the environmental and engineering constraints were taken into account, the resulting parcels were evaluated for development of the layout. Consequently, the selected arrangement of the Project was designed to minimize the potential for impacts to those natural resources to the maximum extent practicable, while reducing the need for extensive grading, land clearing, and site, agricultural, and forest fragmentation within the Project Area.

When considering the Proposed Layout and the Alternate Layout as potential arrangements for Project Components, there were many similarities between the two arrangements. As the Project Area was refined, it was determined that Project Components would be sited in three major groups of Components: two locations to the north of Route 20 (one group inclusive of Areas 1, 2, and 3 as shown on the Preliminary Design Drawings and one group identified as Area 4), and one location south of Route 20 (Area 5). Both the Proposed Layout and the Alternate Layout emphasized placement of Project Components on parcels with proximity to one another to the extent practicable, and within those three major areas. Co-location of solar arrays reduces the overall footprint of the Project, and inherently leads to co-location of other Project Components, such as access roads, collection lines, and fencing, which reduces overall Project impacts. Additionally, fewer access routes decrease the amount of security risk (e.g., fewer gate entrances) and interference with existing land uses and ecological cover types on nearby or proximate parcels.

Through coordination with the Town of Sharon, Project stakeholders, and input received from the public, the Applicant understood the local importance of siting the Project away from Route 20. Therefore, the Applicant worked to continue to refine the Proposed Layout in order to accommodate the Town and public's desire to avoid siting Project Components where they would

be visible along the State-designated scenic byway (Route 20). The Proposed Layout avoided the use of portions of the Project Area that were well suited for the placement of solar arrays (e.g., large open fields with little to no slopes within proximity of the POI) so as to site the Project with little to no views of the solar arrays. The Alternate Layout (as shown on Figure 9-1) included panels and Project Components within view of Route 20 and was preferred due to engineering and other constraints. Based on this feedback and the resolution of engineering constraints associated with the placement of Project Components farther back on Beech Road (off of Route 20), the Proposed Layout was selected as the preferred alternative for the Project over the Alternate Layout.

The primary considerations on alternative arrangements and designs for the Project are described below in further detail.

i. Consideration of arrangements/design options that would enable some continued agricultural use: Both the Proposed and the Alternate Layout enable continued agricultural use around the perimeter of Project fencing and on parcels within the Project Area where no Project Components are placed. Of the approximate 950 acres of New York State Office of Real Property Services (NYSORPS)-classified Agricultural Land (Code 100) mapped within the current Project Area, the Proposed Layout would occupy approximately 307.2 acres of agricultural land and the Alternative Layout would occupy approximately 280.5 acres of agricultural land. Therefore, more than half of the NYSORPS-classified Agricultural Land mapped within the Project Area would remain available for continued agricultural use in either scenario. Each layout would result in minimal fragmentation of agricultural land through colocation of Project Components, including solar panel arrays, access roads, and fencing. Therefore, the Applicant identified both the Proposed Layout and the Alternate Layout as viable options for compatible, continued agricultural use.

ii. Consideration of alternative sites, designs, or arrangements that would avoid or minimize impacts to wildlife and wildlife habitat, including but not limited to habitat fragmentation, disturbance and loss, and the displacement of wildlife from preferred habitat: No threatened, endangered, candidate, rare plant species, or significant ecological communities were identified at the Project Area. The Project Area consists primarily of agricultural land (61.7 percent), with limited suitable habitat for wildlife

species. Other potential habitats within the Project include lesser amounts of forest land and successional shrub land, which are limited in quality.

The impacts to potential wildlife habitat are very similar between the Proposed Layout and the Alternate Layout. The parcels and land cover types identified for Project Components in the Alternate Layout have consistent land cover, and similarly, habitat types, as the Proposed Layout. As described in Exhibit 22, 8.64 of the 10.63 acres (81%) of identified wildlife habitat permanently lost due to the Proposed Layout is located in active agricultural areas which already provide limited wildlife habitat due to the regular disturbances and anthropogenic pressures of active farming practices (see Exhibit 22, Section 22(f)(4)). Potential habitat loss from implementation of the Alternate Layout is similar, at 7.24 acres (80%).

Most of the non-agricultural habitats at the Project Area are adjacent to active agriculture and roads and are, therefore, subject to disturbance. Additionally, the Project Area has already experienced habitat fragmentation from agricultural conversion, and natural habitats such as forest land are very limited. Of the suitable habitat for species such as grassland birds, as described in Exhibit 22, it is likely that most of the successional old-field habitat at the Project Area is abandoned agricultural land and has experienced disturbances and is low in quality.

The arrangement of Project Components on parcels within close proximity to one another, as well as the placement of Project collection systems underground, reduces fragmentation and habitat impacts to the maximum extent practicable, for both the Proposed and Alternate Layouts. In areas where impacts to wildlife habitat will occur, the evaluations performed as part of the Application indicate that an abundance of similarly functioning available habitat generally exists in the areas adjacent to the impact areas. As such, overall impacts to the habitat requirements and use for wildlife individuals or species in the Project Area have been minimized to the maximum extent practicable with the Proposed Layout, and both the Proposed and Alternate Layouts were identified as viable options with minimal impact to wildlife and wildlife habitat.

iii. Arrangements that would avoid or minimize impacts to waterbodies, wetlands, and streams: Through careful siting of Project Components, there are only minor impacts

to wetlands (197 square feet) in two locations due to grading for a proposed access road with the Proposed Layout. These impacts would be slightly greater with the implementation of the Alternate Layout, at 215.6 square feet, although still minor, as impacts to waterbodies, wetlands, and streams were an important siting component to be avoided in both scenarios. Several potential development areas within the Project Area were removed from consideration for placement of Project Components due to identified wetland and waterbody resources on-site. Therefore, the Proposed and Alternate Layouts were the two options which limited impacts to wetlands or waterbodies to the maximum extent practicable.

As shown on Figure 22-4, there is a New York State Department of Environmental Conservation (NYSDEC) regulated wetland mapped within the Project Area. As shown on the Preliminary Design Drawings (Appendix 11-1), this wetland complex has been avoided to the maximum extent practicable and Project Components will only impact a small percentage of the 100-foot adjacent area of this wetland for both layouts. Due to the presence of this natural resource feature, the majority of this parcel was not considered for solar array placement. Although this resulted in an increased distance between the two portions of solar arrays north of Route 20, this layout was considered the most viable to decrease impacts to environmental resources and was considered for both the Proposed and Alternate Layouts. Additionally, the collection lines to be run between these two areas of panels will be installed where the wetland, and associated stream features, are less extensive, and will be installed using horizontal directional drilling (HDD) methods. As such, both the Proposed and Alternate Layouts minimized impacts to wetland and waterbody resources to the maximum extent practicable.

iv. Arrangement of inverters away from property lines: Both the Proposed Layout and the Alternate Layout site inverters away from Project Area boundaries. As inverters for the Project will be centrally located within the arrays, access roads to the inverters have been sited with the both layouts to maximize the ability to use one access road to access many array and inverter locations where practicable. Therefore, both the Proposed and Alternate Layouts are similar and are able to site inverters away from Project Area boundaries.

v. Consideration of alternative perimeter fencing designs that would minimize contrasts with adjacent land uses and visual character: Fencing is proposed as close as feasible to the solar arrays, while still allowing access for maintenance and emergency services. Alternative perimeter fencing designs were considered; however, the fencing for both the Proposed and Alternate Layouts was selected due to substantive local requirements and safety considerations. Fencing will be located around Project Components and has been evaluated as part of the visual assessment in Exhibit 24. Additionally, landscaping efforts to minimize visibility of Project Components, including fencing, from public vantage points and adjacent residential uses is included on the Landscaping Plan in Appendix 11-1.

As previously noted, the Applicant understands the Town and local community's preference that the solar arrays be sited out of sight from Route 20 (scenic byway) to the maximum extent practicable. Therefore, it was determined that the Proposed Layout, and not the Alternate Layout, be selected as the general arrangement and design for the Project in order to minimize visual contrasts to the maximum extent practicable.

(2) Technology

Several factors are considered when selecting the type of solar panels and other technological factors for development of a solar project, including market competition, tax incentives, availability of panels, industry trends, experience, and solar resource site suitability/characteristics. As the Project's commercial operation date is in 2021, the changing nature of solar panel technology makes it difficult to determine the exact solar module type that will be utilized.

The Applicant is proposing the use of a tracking array system and intends to use a solar module similar to the Jinko Solar Eagle 72HM G2 380-400 Watt Mono Perc Diamond Cell for the Project (see Appendix 2-1 for specification sheet). The tracking system proposed for the Project will be similar to the Gamechange Solar Genius Tracker™ (see Appendix 2-2). Solar tracking systems maximize production by slowly moving the solar modules to follow the sun throughout the day, optimizing the angle at which the panels receive solar radiation.

As noted above, the technology available for solar panels upon construction of the Project is not able to be known at this time. Therefore, the Applicant will continue to evaluate new technological

considerations, as appropriate, throughout finalization of the Project. This evaluation includes the potential use of fixed tilt arrays (instead of tracking) if it is deemed more efficient for Project output and efficiency. If a fixed tilt system is used, the Applicant will utilize an array system similar to the Gamechange Maxspan™ Pile Driven System (Appendix 2-3). These two types of arrays are similar in height, area, and color so there would be no significant difference in appearance. Final details and specifications of the selected Project technology will be provided as part of Compliance Filings for the Project.

(3) Scale or Magnitude

The scale and magnitude of the Project is limited to the development of a 50 MW solar project. That capacity is stated in the NYSERDA REC contract. In addition, that capacity was studied and approved by the NYISO for interconnection into the bulk transmission system. Generally, approximately 5-10 acres of land are required to generate one MW of energy under New York State solar conditions. As described in Section 9(a), the Project Area was expanded following submittal of the PIP Plan to increase the amount of area available on which to properly site Project Components; however, the generating capacity of the Project (and subsequent acreage required for development) was not changed.

(4) As the Project does not involve wind power facilities, alternative turbine layouts are not applicable to the Project.

(5) Timing of the proposed in-service date for the Project in relation to other applicable planned additions, withdrawals, or other capacity, transmission or demand reduction changes to the local electric system.

The proposed in-service date of the Project is November 2021 in accordance with the Applicant's contract with NYSERDA. As documented in the SRIS provided in Exhibit 5, the Project will not have any adverse impacts to the reliability of the electric grid. The sooner that the Facility goes into operation, the sooner that the benefits of the Project (including emission free electric generation and local benefits) can be implemented.

9(d) Why the Project Location Best Promotes Public Health and Welfare

As discussed further in Exhibit 15 (Public Health and Safety), the Project will not result in adverse impacts on public health and welfare. Once operational, the Project will achieve state energy needs using a clean, renewable source of fuel (solar) and reducing air pollution (Exhibit 17). Additionally, the Project will diversify New York's energy supply while reducing the amount of electricity that New York produces through fossil fuel generation. These factors support human health and are especially good for the climate in light of the current dangers posed by climate change. To this end, producing energy from a clean, renewable resource will offset fossil fuel carbon and other air pollutant emissions that are harmful to public health and the environment. The Project will use no water and require no fossil fuel or fuel transport to operate, which also promotes public health compared to conventional energy generation.

Glare to airports, roadways and residences has been avoided or minimized to the maximum extent practicable, as discussed in Exhibit 15.

To ensure that the Project minimizes effects on public health and welfare to the extent practicable, the Proposed Layout takes into account the Town's front, side, and rear yard setbacks contained its zoning ordinance (see Exhibit 4(i) and Exhibit 31). These measures will ensure that there is limited risk to public health and safety, while also serving to minimize annoyance of local residents due to potential sound or visual factors. The solar arrays are also proposed on leased private property. Therefore, public access to the Project is limited.

The Project will also result in an increase in local revenues that can be used to promote public welfare. The contribution to local school districts, through payments in lieu of taxes (PILOT), will create better facilities and opportunities for students where needed. The contributions to the Town of Sharon and Schoharie County can be used to improve roads, infrastructure, and emergency services in the area. Additionally, there will be positive short-term economic impacts during construction from jobs and spending and then during operation, from permanent jobs, including Project employees, outside mowing and snow removal services over 30 years, that will be created and that will provide a local positive economic benefit (see Exhibit 27).

Solar project payments to landowners through purchase or lease help stabilize revenues for local participating farmers (as crop and dairy prices often fluctuate from year to year) and payments paid to landowners are typically reinvested in the community, helping to create jobs and improve

the local economy. These local benefits combined with the contribution to clean air and positive impacts on the climate demonstrate why the Project's location promotes public health and welfare.

Locations within the Project Area that may support cultural resources have been evaluated as part of the studies included in Exhibit 20 (Cultural Resources). As part of the Phase IA and Phase IB studies performed for the Project, the Applicant has established four Archaeological Avoidance Areas and one cemetery which were taken into consideration as part of Project design. These locations are discussed in Exhibit 20 and will not be impacted as part of the Project, which will ensure that impacts to potentially significant archaeological resources are avoided. In addition, as described in Exhibit 4, impacts to recreational uses have been avoided to the maximum extent practicable.

9(e) Why the Project Design, Technology, Scale, and Timing are Best Suited for Public Health and Welfare

The Project design, technology, scale and timing best promote public health and welfare for a number of reasons. Numerous studies and countless hours went into the design of the Project to maximize the effectiveness of the panel arrays as well as to ensure that they are located at locations within the Project Area that are safe and that pose no harmful health effects to landowners in the area. Wetland and waterbody surveys, health and setback analyses and more all went into the siting and design of the Project to ensure that public health considerations were addressed and the Project will be built with a design and in a manner that will not impose health burdens upon people in the local area. Further, the Project design encompasses industry best standards and will utilize the existing resources in the area to the maximum extent practicable in order to produce clean energy efficiently which will create jobs in the area and allow the Project to contribute economically to the community.

Currently, the 50 MW Project is limited to installation of panels on 352 acres of the 1,313-acre Project Area. A project of a larger scale would require the development of more land, increasing the overall environmental impact. On the other hand, a larger project would have a larger economic benefit, but it may not be feasible to build a larger project because of the upgrades that may be required to the transmission grid Those possible upgrades, their costs, environmental impact and licensing requirements, risks and duration, have not been studied by the NYISO nor the Applicant. Alternatively, a smaller scale project may have less of an overall impact on the area but it would have a smaller economic benefit. A smaller project may also not be economically

viable since commercial-scale solar projects benefit from economies of scale and certain costs and other parts of the Project are fixed, regardless of size.

Finally, with regards to timing, the Project had been awarded a contract under NYSERDA's Renewable Portfolio Standard Program Purchase of Renewable Energy Attributes for 50MWs of capacity. Large-scale renewables are a critical component in achieving New York State's energy goals of 70 percent renewable power by 2030 zero greenhouse gas emissions from the electric generation sector by 2040. This Project will produce clean energy, reduce overall emissions in the state and help New York achieve its goals on time. A delay in the timing will jeopardize the Project's NYSERDA contract and impede rather than facilitate the State's ability to meet its goals.

9(f) Description and Evaluation of No Action Alternative

The "No Action Alternative" assumes that the Project Area would continue to exist as agricultural, forested, and rural residential land and that the Project is not built. Under this scenario, nothing immediately changes versus current conditions and current uses in the area.

The No Action Alternative also means that the local communities receive no benefits from the hosting of a utility scale solar project, and that the county, town, and local schools would not receive PILOT payments which could have a tremendously positive impact on the community and local economy while diversifying their revenue streams. Additionally, the Project is expected to create approximately 125 local jobs in construction trades and up to 3 permanent operation and maintenance jobs, which will also have a positive impact on the local economy.

The No Action Alternative also would not promote New York State's energy policy directives as contained in the recently enacted CL&CPA would not contribute to the State Energy Plan's goals and would not help meet the NYPSC's adopted Clean energy Standard. In order to meet the State's goals and objectives, more renewable energy projects need to be built, and with the NYSERDA contract, the East Point Energy Center is a viable, large-scale clean energy project that can be licensed successfully in New York State and should be included in the State's future energy mix.

There are limited recreation opportunities for the public at the Project Area; therefore, the impact to recreational uses is minimal and limited to those allowed by the private landowners. The No Action Alternative therefore would not significantly improve recreational opportunities at the Project Area.

The very minimal impacts of the Project, as described within the Application, are recognized but are significantly outweighed by the Project's positive economic, health, and environmental advantages. The No-action alternative, therefore, is a materially inferior option.

9(g) Identification and Description of Alternative Energy Supplies

As previously stated, the Applicant has been awarded a contract for this Project under NYSERDA's Renewable Portfolio Standard Program Purchase of Renewable Energy Attributes. This award is specifically for the development a solar generated energy facility in New York State, and not another alternative energy supply. In support of NYSERDA's award for this solar Project, contracts with landowners for this Project are exclusively for a solar energy project. Therefore, alternative energy supplies are not a reasonable nor viable alternative and energy supply sources other than solar energy will not be considered in this Application.

9(h) Transmission and Demand-Reducing Alternatives

Due to the private nature of the Project, and the objectives and capabilities of the Applicant, (i.e., solar powered electric generation), transmission and demand-reducing alternatives are not evaluated in this Application.

9(i) Why the Project is Best Suited to Promote Public Health and Welfare

As mentioned previously, various siting constraints dictate the size and layout of a solar energy project. The proposed Project has been designed with consideration given to the important balance between the increased need for clean electrical energy generation and the protection of public health and welfare. The placement of Project Components has been researched, reviewed and scrutinized in the development and engineering process to avoid and minimize negative impacts and to incorporate extensive siting considerations including (but not limited to) landowner requests, setback requirements, minimizing visibility from Route 20, solar resource, constructability, and avoidance (or minimization) of impacts to wetlands, streams, and agricultural land.

As previously discussed in this Exhibit, the Project location, design, technology, scale and timing each take into consideration and promote public health and welfare. The Applicant has done its best to balance the goals of the State and the Project with the goals of the community and the local landowners. Careful consideration was given to impacts including, but not limited to, environmental, aesthetic, agricultural, and time and attention was dedicated to working with

stakeholders to minimize negative impacts and maximize positive benefits, ultimately to arrive at a Project that is best suited for this area, for this community, and for the State of New York.

9(j) Impacts to Vegetation

The Project Area consists primarily of agricultural land, and therefore, impacts to vegetative communities would be similar whether the Proposed Layout or other alternative arrangements were considered. As discussed in Exhibit 22, the Project Area consists predominately of active agricultural land, most notably corn and soybeans. The ability of the Project Area to reduce soil erosion will be increased in areas where grass cover will more broadly cover the surface (e.g., in place of row crops with exposed soil). Additionally, linear Project Components, such as access roads and collector lines, have been co-located to avoid and minimize impacts to plant communities. Solar panels have been proposed in areas already disturbed by agriculture to the maximum extent practicable. As discussed in Section 9(c)(1)(i), the layout and design of the Project allows continued agricultural use up to the fencing of the Project and is at the discretion of the landowner. The Decommissioning and Restoration Plan, required by Exhibit 29, will help restore disturbed areas to substantially their pre-construction conditions.

In order to further minimize impacts to vegetative communities, the siting of Project Components focused on avoiding unnecessary impacts to grasslands, interior forests, wetlands, shrublands, and young successional forests. As a result, impacts to these landscape features (and vegetation communities) will be marginal.