Attachment E: Evaluation of the Magnitude and Importance of Potential Project Impacts

INTRODUCTION:

The Proposed Action, referred to as the 69 kV KM Electric Transmission Line Replacement Project (Project) is described in the attached Project Description (Attachment C). Associated Project construction details are also discussed in the Construction Information Summary (Attachment G). It is anticipated that the Town of Wappinger Planning Board will serve as Lead Agency for the review of the Project under the State Environmental Quality Review Act (SEQRA). The Wappinger Planning Board has the broadest review for investigation of the Proposed Action through its authority over the majority of the potentially affected property and infrastructure. Approximately 60% of the Project Site (i.e., public utility ROW), 60% of the proposed transmission poles, and over 70% of the land disturbances are located within the Town of Wappinger. All certified agricultural districts along the Project Site are in the Town of Wappinger. The Proposed Action does not propose any work within regulated wetlands or buffer areas within the Town of Poughkeepsie, while it includes within the Town of Wappinger the replacement of twelve existing poles within such wetland areas as well as the vast majority of poles of the line located within mapped flood hazard areas. To assist with the SEQRA review of the Project, the following summary of potential environmental impacts relative to both Towns is discussed below.

This analysis has been prepared to assist the Lead Agency under SEQRA and has been formatted to align with the Parts 2 and 3 of the FEAF. This is not limited to potential impacts that may be identified as "moderate to large" in Part 2 of the EAF. Rather this summary is used to discuss and explain the analysis of any potential impacts, and why a particular element of the Proposed Action will not result in a significant adverse environmental impact. Such analysis is appropriately set forth in this summary, even if the potential impact would be identified as "none" or "small" within Part 2 of the EAF, as the case is here for all impact topics. Thus, this evaluation conservatively discusses impacts that may be identified as "small" to articulate the basis for the analysis of the environmental topic.

SUMMARY OF ENVIRONMENTAL ISSUES:

Impact on Land

EAF Part 1 confirms there will be no impact, or a small impact on land. Central Hudson is proposing to replace an existing 69 kilovolt (kV) electrical transmission line, known as the 'KM Line' within an existing public utility right-of-way (ROW or Project Site). This KM Line was originally constructed in the ROW almost one-hundred-years ago. The total length of the replacement project is approximately 2.8 miles, with nearly 1.7 miles within the Town of Wappinger and nearly 1.1 miles within the Town of Poughkeepsie. The replacement project will take place within the existing ROW width, which varies from 60 feet to 125 feet. The entire ROW has been appropriated to public utility use. All existing poles on the KM Line will be removed and replaced nearly one-for-one in the same general location.

The current KM Line ROW ("Project Site") is located within the Hudson Mohawk Lowlands region of New York State (NYSDOT, 2013). The Hudson Mohawk Lowlands extend 3 to 20 miles east of the Hudson River. The terrain in the Study Area consists of gently sloping hills with 50–100 feet of relief, and elevations range from approximately 150–200 feet above mean sea level. The Hudson Highlands lie to the southeast of the Project Site with elevations ranging from 750–1000 feet (USDA, 2001). The primary land uses in the area are commercial development, undeveloped forest, and typical residential.

The Project Site is approximately 37.5 acres (see Figure 2). However, construction of the Project will result in the temporary disturbance of approximately 8.3 acres of land within the ROW (approximately 6 acres in Wappinger and approximately 2.3 acres in Poughkeepsie). This disturbance will be confined within the existing cleared ROW primarily in previously disturbed areas, and is associated with construction access, replacement pole installation, temporary marshaling yards (i.e., temporary material storage, parking area, personnel trailer) and wire pulling sites. No development of hilltops or ridge lines is proposed. Construction will avoid disturbing existing vegetation where feasible. There will be no change in land use or additional impervious

surfaces resulting from the replacement of existing poles. The portions of previously disturbed areas around where the existing poles are located will also be reclaimed as vegetated land. No construction work will take place on steep slopes greater than 15 percent, thus limiting the potential for soil erosion and sedimentation thus limiting the potential for harmful soil erosion and sedimentation. The potential for soil erosion and sedimentation impacts will be further minimized and avoided through implementation of a Stormwater Pollution Prevention Plan (SWPPP). A notice of intent (NOI) and SWPPP is included with this application. This SWPPP has been developed in conformance with applicable provisions of Chapter 213 of the Town of Wappinger Code, Chapters 97 and 173 of the Town of Poughkeepsie Code, among others, NYS SPDES General Permit 0-20-001 and the latest version of the New York State Standards and Specification for Erosion and Sediment Control (the Bluebook).

To further avoid and minimize impacts to land, the Applicant is proposing to utilize existing established access routes to the ROW to the extent possible. The use of previously established access routes (e.g., driveways, farm roads, etc.) will reduce the need for additional earthwork or land clearing. Only minor improvements (such as potential limbing of trees) to accommodate equipment and material deliveries are anticipated along these existing access routes. The proposed action does not include any excavation, mining, or dredging (excluding general site preparation, grading, or installing utilities as provided in the SEQRA instructions for Part 1 of the Full EAF, where all excavated materials will remain on site). Although not anticipated, if off-site removal of excavated material is required, such removal would be conducted in accordance with the SWPPP and of a short duration, so no adverse impacts would occur.

Construction of the Project is anticipated to take less than a year and estimated to require approximately 6-12 months. In addition, specific land disturbance activities (i.e., site preparation, grading, etc.) are only anticipated to last for a limited portion of that period (see Construction Information Letter as Attachment G). For this linear transmission line rebuild, the work will generally occur in stages as the crews move down the ROW in sections to work on the replacement of poles. As poles are set, they will be backfilled, and the area seeded and mulched upon

completion of each pole as the work progresses. Adverse impacts that could potentially result from a lengthy construction schedule will also be avoided. Therefore, due to the limited duration of construction, and potential measures to further expedite temporary disturbances, any potential adverse impacts resulting from a lengthy construction schedule will thus be avoided.

Overall, most potential land impacts are temporary and short term. Similarly, the magnitude and severity of the impacts are relatively low since the Project is taking place within an existing public utility ROW which is largely disturbed and contains substantial existing utility infrastructure. The replacement poles will be located in the same general location of the existing poles as shown on the Plan and Profile drawings. The importance of the impact to land is also low, since the impacts are largely temporary and will not affect large groups of people. Further, the Project will meet the critical need for safe and reliable electric service, providing an important benefit to the community. For all of these reasons, the Project will not cause a significant adverse impact relating to impacts on land.

Impacts on Geological Features

The Project Site is a ROW containing electric transmission infrastructure and has been wholly appropriated to public utility use. The Project is not adjacent to a geological feature listed as a National Natural Landmark and it will not affect unique or unusual landforms, dunes, caves, or cliffs. The Project will not result in any potential adverse impacts to unique geological features.

Impact on Water

The Project will have no adverse impact on surface or groundwaters. Surface water resources along the ROW include 11 wetlands and two streams that are likely under federal jurisdiction, including three New York State Department of Environmental Conservation (NYSDEC)-mapped wetlands. Wetland and stream areas were field delineated in the fall 2017 and 2021 and are identified and described in the Wetland Delineation Report prepared by EDR, 2021.

No new permanent fill or long-term impacts to surface waters will result from the Project. Temporary construction access and replacement of existing poles within delineation surface waters will be required; however, this work is anticipated to result in no impacts or minor impacts as indicated in Table 1 below. Of the 11 wetlands identified along the ROW, the Project will avoid all disturbance to two of these wetlands (1Y and 1X). Construction access and/or pole replacement will only result in temporary disturbance to nine wetlands (1W, 1V, 1U, 1T, Z, 3B, 3A, 3C, and 3E).

Table 1. Summary of Disturbances to Wetland Resources

Field ID	Municipality	NYSDEC Wetland ID	Stream Present	Structure Span	Wetland Type[1]	Replacement Poles Located within Wetlands	Potential Impacts	P&P Sheet No.
1Y	Wappinger	--	--	--	PEM	--	Avoid	2
1X	Wappinger	--	--	--	PFO	--	Avoid	2
1W	Wappinger	--	--	KM 1-KM 4	PSS	1	Matting	2
1V	Wappinger	WF-25	Yes	KM 5 – KM 8	PEM	2	Matting	2
1U	Wappinger	WF-34	--	KM 7- KM 11	PSS	3	Matting	2 & 3
1T	Wappinger	WF-1	--	KM 13- KM 17	PSS	2	Matting	3
1T	Wappinger	WF-1		KM 12 – KM 14	PEM	1	Matting	__
Z	Wappinger	--	--	KM 18- KM 20	PEM	1	Matting	4
3B	Wappinger	--	--	KM 22 – KM 23	PEM	--	Matting	4
3A	Wappinger	--	--	KM 22 – KM 24	PSS	1	Matting	4
3C	Wappinger	--	--	KM 26- KM 28	PEM	1	Matting	4
3E	Poughkeepsie	--	Yes	--	PSS	--	Matting	4
Total	--	--	--	--	--	**12**	--	--

[1] Wetland community types noted are based upon the Cowardin et al classification system: PFO = Palustrine Forested, PSS = Palustrine Scrub-Shrub, PEM = Palustrine Emergent, and OW = Open Water. PFO communities are located off-ROW and are not located within existing cleared ROW.

Table 2. Summary of Temporary Disturbances to Stream Resources

Field ID	Stream Type	NYSDEC Stream Class	Potential Impact	P&P Sheet No.
1V	R2	C	Avoid, No Impact	2
3D (Wappinger Creek)	R3	B	Avoid, No impact	4

As stated previously, no permanent impact or fill with wetlands or streams is proposed. Due to the removal of the 12 poles to be replaced, there will be no net fill in wetlands or loss of water resources. Further, construction access in wetlands will be limited to matted areas; therefore, the amount of direct impact to wetlands is limited to the diameter of a replacement pole in each instance. Given an approximate diameter of 2 feet, the area per pole is roughly 3 square feet ($A=3.14 \times 1^2$), for a total of 37.6 square feet for all 12 replacement poles. The total amount of wetland disturbance is less than the 1/10 of an acre threshold for permitting and notification under the U.S. Army Corps of Engineers Nationwide Permit 57 for Electric Utilities. This is a very small area and no clearing of forested wetland will result from Project construction. For these reasons, any potential impacts would be small, and no significant adverse impacts to wetland or stream resources are anticipated. Furthermore, potential impacts to wetlands and streams resulting from temporary disturbances (i.e., vehicle access, pole removal, pole installation, etc.) will be avoided and/or minimized completely by:

- Installing construction matting at temporary crossings, if required. If suitable soil conditions exist, such that no visible rutting or alteration of the hydrology of the wetland would result, then crossing the wetland may occur without matting. Should visible rutting occur, the affected access route(s) will be upgraded to include construction matting
- Restoring disturbed areas to original grade and profile
- Seeding disturbed areas with native wetland seed mix
- Mulching or covering exposed soil to limit erosion and sedimentation

- Conforming to the NYS Standards and Specifications for Erosion and Sediment Control as outlined in the Project SWPPP

The Project will not result in new or additional use of water. It will not generate any liquid wastes. Vegetation on the existing ROW is maintained by Central Hudson in accordance with the requirements of their New York Public Service Commission (PSC) approved Long Range Vegetation Management Plan (LRVMP). As part of the LRVMP, and in accordance with PSC requirements, the Applicant performs routine vegetation maintenance to trim and/or remove trees that pose a danger to utility infrastructure. Certain herbicides are currently used to control vegetation in and around public utility infrastructure in the ROW and this activity must continue pursuant to the LRVMP. Construction activities will also be monitored by Central Hudson Environmental Affairs staff and/or qualified contractors to ensure that environmental protection measures and SWPPP protocols are enforced. For the above reasons, no significant adverse impacts to ground water or any wetland and stream resources will occur from the Project.

Impacts on Flooding

The Project will not have an adverse impact on flooding. Per a review of the 2015 FEMA floodplain data, floodplains and floodways are present along the ROW at three primary locations: Wappinger Creek and two tributaries to Wappinger Creek, north of Myers Corners Substation and north-east of Wildwood Drive (see Figure 3). At Wappinger Creek, the FEMA-mapped 100-year floodplain is greater than 600 feet wide and includes a mapped floodway (situated in both the Towns of Wappinger and Poughkeepsie). At the tributary of Wappinger Creek near Myers Corners Substation and north-east of Wildwood Drive in the Town of Wappinger, the FEMA-mapped 100-year floodplain is over 400 feet, and 500 feet wide, respectively. Of the 49 replacement poles on the KM Line, 12 are located in the 100-year floodplain as identified below:

Table 3. Summary of Poles in FEMA Floodplain

Municipality	Location	No. of Poles in Floodway	No. of Poles in 100 yr. Floodplain	Total
Town of Poughkeepsie	Wappinger Creek	2	-	**2**
Town of Wappinger	Wappinger Creek	1	2	**3**
	Tributary of Wappinger Creek North of Myers Corners		3	**3**
	Tributary of Wappinger Creek northeast of Wildwood Drive	1	3	**4**
Total		**4**	**8**	**12**

The KM Line was originally constructed in its current location almost one-hundred-years ago. It is understood that there are no existing or past concerns regarding flooding, blockage, and/or debris collection at either floodplain location or associated with the existing poles located in the Towns of Poughkeepsie and Wappinger. The replacement poles will be located the same general locations as the existing poles. Therefore, adverse impacts to flooding resulting from the pole replacement are not anticipated. Notably, the poles located with the Wappinger Creek floodplain/floodway must remain in order to meet safety standards and design requirements of the National Electric Safety Code (NESC).

Replacing poles within the floodplain/floodway will not result in adverse impacts to flooding. As described above there are several poles currently located within floodplains and the width of these replacement poles (i.e., 2 foot diameter per pole) matches the existing poles. These narrow poles are considered minimal when compared to the larger width of the overall floodplain areas which exceed 700 feet wide in certain locations. Thus, no cross-sectional area will be lost, and the

available floodplain capacity will not be adversely affected. Further, these poles are not anticipated to affect flood flow and are consistent with the existing landscaping, fences, and/or wooded areas alongside Wappinger Creek and/or its tributaries. In addition, no new grading, fill, or changes to impervious cover within the floodplain areas are proposed, thus further minimizing potential hydraulic or hydrological impacts. The poles will be placed in the same location as existing poles and will be installed with pre-cast concrete bases for additional support.

As a contingency plan for potential on-site flooding resulting from large storm events during construction, the following measures will be implemented for work at the Project Site:

- In anticipation of a storm event, all construction equipment will be stored outside of the 100-year floodplain.
- In anticipation of a storm event, all erosion and sediment control materials will be reinforced and the site will be stabilized in accordance with the SWPPP.

For all of these reasons, no adverse impacts to flooding will occur from the Project.

Impact on Air

The Project's operation will have no impact on air quality. The Project may have a minimal, temporary impact on air quality during construction typical to development projects in the area due to construction vehicles and equipment. However, the Applicant is taking a conservative approach by implementing a dust control program as necessary to control airborne dust that could be generated from construction vehicles traveling over unpaved access roads and exposed soil. Such potential impacts, however, would be temporary, short term, and common to area construction, and will not result in adverse impacts.

Impact on Plants and Animals

There will be no impact, or a small impact, on plants and animals. Correspondence from the New York Natural Heritage Program (NHP), dated October 19, 2020 indicates that two state-listed threatened/endangered species may occur at or in the vicinity of the Project Site:

- Pied-billed Grebe **(***Podilymbus podiceps)*
- Indiana bat (*Myotis sodalis*)

In addition, a web-based review of the U.S. Fish & Wildlife Service (USFWS) Information, Planning, and Conservation (IPaC) decision support system completed in July, 2021 indicates the possible presence of the following federally-listed species in the vicinity of the proposed Project Site or in Dutchess County:

- Northern long-eared bat (*Myotis septentrionalis*)
- Indiana bat (*Myotis sodalist*)

No impacts to state or federally threatened or endangered species are anticipated from the proposed Project, as discussed for each species below. Copies of NHP and IPaC correspondence are provided in Attachment F.

Indiana Bat and Northern Long-eared Bat

Indiana bat is a state and federally listed endangered species that hibernates in caves during the winter and roosts in hardwood forests in the summer months. Potential impacts to this species must be considered for any Project in New York State that is located at or below an elevation of 900 feet above mean sea level and in a county where the species is known to occur (USFWS, 2010). Of particular importance are projects that involve clearing of trees greater than four inches in diameter at breast height (DBH) with loose or exfoliating bark, as these trees are suitable for a majority of roosting requirements by this species (USFWS, 2010). Per NHP records, a known Indiana bat maternity roost has been identified 1.1 miles from the Project Site.

The northern long-eared bat, whose range encompasses all of New York State, is listed as threatened by the USFWS and New York State. Habitat for the summer period may include day roosts in buildings, under tree bark or behind shutters, or in caves during the night. In the winter, hibernation sites are typically in mines or caves (USFWS, 2015). Foraging habitat includes forest openings, forested hillsides and ridges, and small ponds or streams (NYNHP, 2017a). According to the USFWS, clearing of trees is generally considered to have no effect on the northern long-eared bat provided the trees are not cut within a 0.25-mile radius of a known northern long eared bat hibernaculum, and tree clearing does not occur within a 150-foot radius of a known occupied maternity roost during the pup season (June 1 through July 31) (USFWS, 2016). Per NHP records, there is no known hibernaculum or maternity roost for this species at or near the Project Site.

Vegetation at the Project Site is maintained by the Applicant in accordance with the requirements of their PSC approved LRVMP. As part of the LRVMP, and in accordance with PSC requirements, the Applicant performs routine vegetation maintenance to trim and/or remove trees that pose a danger to utility infrastructure. Although the majority of the existing Project Site is maintained by the Applicant in accordance with the LRVMP, some additional tree clearing and/or removal of danger trees may be required to facilitate construction of the Project. As indicated above, there are no records of Indiana or northern long-eared bat occurring within the Project Site. The closest known Indiana bat roost tree is located 1.1 miles from the ROW. Therefore, as a conservative approach, to further avoid and minimize any potential adverse impact to these species, required tree clearing will be scheduled to take place within the USFWS-approved tree clearing period of November 1 to March 31, which encompasses the period of hibernation for both species. Clearing of trees within this period is found to have little to no effect on these bat species. Additionally, indirect or other long-term adverse impacts to bat habitat are not anticipated since the clearing is limited in scope. The Project is located in a predominately cleared and already disturbed public utility ROW. The Project will not result fragment the existing forest and is not anticipated to create an impassable barrier for any bats that may use habitats within

the Project Site, including those known to roost in the vicinity. As such, no adverse impacts to Indiana and northern long-eared bats will result from the Project.

Pied-billed grebe

The pied-billed grebe is a migratory waterbird that is listed as threatened in New York State. Preferred breeding habitat consists of ponds and slow-moving streams that have a sufficient mix of open water for foraging, and deep emergent vegetation for cover and nesting (NYSDEC, 2018). Breeding pairs appear to favor wetlands of intermediate size (0.6–7.0 hectares) over small of large wetlands (NYNHP, 2017b). Loss or conversion of wetland habitats has caused declines in the species' population; however, the species has been increasing in New York in recent years due to wetland conservation and restoration efforts (NYSDEC, 2018).

Per NYNHP records, pied-billed grebe is known to breed within 0.25 mile of the ROW. However, there are no open-water wetlands within the Project Site, and no open-water wetlands will be impacted by the Project. Therefore, the Project is not anticipated to have any impact on the pied-billed grebe.

Impact on Agricultural Resources

Approximately 9.66 acres of Dutchess County Agricultural District 22 lie within the KM Line ROW (within the Town of Wappinger), of which approximately 2.8 acres will experience some temporary disturbance to accommodate construction access, pole replacement, and wire pulling (see Agricultural Data Statement)[1]. However, no farming operations are readily apparent. A total of 9 (2 foot wide) poles will be replaced within Dutchess County Agricultural District 22 for the KM line. Please note, the land within this location land is mostly surrounded by forests and, as determined from site visits and aerial review, does not appear to be easily farmed without significant tree clearing. Considering these factors, the information provided in the Agricultural Data Statement,

[1] Based upon Dutchess County 2017 agricultural data.

and Central Hudson's conservative approach, the Project will not result in adverse impacts to agricultural resources. See Agricultural Data Statement as Attachment J.

Impact on Aesthetics Resources

As described in the Visibility Assessment (see Attachment I), the proposed Project will not result in a meaningful increase in the area where the transmission line is visible (i.e., the net increase in area from which the lines are visible will increase by only 0.3%). In addition, open or partially screened views are generally confined to an area immediately adjacent to the Project Site, and consistent with existing conditions. The replacement poles are being installed in generally the same locations as existing poles, within the existing cleared ROW. Therefore, views of the Project will predominately be limited to the areas at which the existing infrastructure is already visible and the magnitude of any perceived impact is small. For additional information, see Visibility Assessment (Attachment I) and additional discussion below pertaining to Community Character.

Impact on Historic and Archaeological Resources

The Applicant has consulted with the New York State Office of Parks, Recreation, and Historic Preservation (NYSOPRHP) regarding the Project's potential effects on cultural resources, including historical and archeological. On December 5, 2017, the Applicant submitted an information request to the NYSOPRHP via the Cultural Resources Information System (CRIS) online repository. On March 1, 2018, NYSOPRHP responded via their CRIS indicating the Project "will have no impact upon cultural resources in or eligible for inclusion in the National Registers of Historic Places". A copy of this correspondence is included in Attachment F. Overall, there will be no adverse impacts on historic and archeological resources from the Project.

Impact on Open Space and Recreation

The Project occurs within an existing private ROW that has been appropriated to public utility use and is not available for authorized public open space or recreation. Consequently, the proposed Project will not have a significant adverse impact on recreation. Portions of the Project Site (i.e., ROW) that are located on or adjacent to an active park (Stanley Still Park) will not be expanded or

changed. Indeed, because the proposed work involves a replacement of an existing transmission line within an existing ROW, no permanent impacts, or loss of open space or recreation areas at Stanley Still Park will occur. As stated previously, no significant change to the visual character of Stanley Still Park is expected because the replacement poles will be installed at the same general location and height as the existing poles. Lastly, the Applicant has coordinated with the Town of Poughkeepsie to identify suitable access routes within the Park to minimize and avoid any potential impacts during construction.

Impact on Critical Environmental Areas

There are no state-listed Critical Environmental Areas (CEAs) along the Project Site.

Impact on Transportation

After completion of construction, there will be no traffic generation from the Project. The Site will remain "unoccupied" and contain public utility infrastructure. Therefore, no long-term impacts to traffic will occur.

The limited period of Project construction may result in some temporary increase in vehicular traffic, as construction vehicles and personnel travel to and from the Site. Construction vehicles may include, but are not limited to concrete trucks, dump trucks, delivery trucks, low boy trailers, utility line trucks and pick-up trucks. The highest levels of construction traffic are anticipated to occur during the delivery of materials. There will be a few temporary shoulders and/or lane closures, of short duration, during construction to allow for deliveries of materials and removal/construction of poles. Temporary closures and flagging will be conducted in accordance with New York State Department of Transportation (NYSDOT) Maintenance and Protection of Traffic (MPT) standard details as shown on the provided Plan and Profile drawings. The traffic control/safety plan(s) are anticipated to include posting of flagmen, regular road inspection and repair as necessary, coordination with the Wappinger Central School District school district (if needed to avoid conflicts with school buses), placement of temporary maintenance and protection of traffic signs advising drivers to reduce speed, and possible temporary re-direction of traffic to

alternate routes. Potential sound during this process will also be minimized by prohibiting truck drivers from using engine brakes (except in emergency situations) or from idling their vehicles for more than 15 minutes. The dust control program will involve regular monitoring of dust generation, sweeping paved road surfaces, and application of water to road surfaces by a water truck as needed to suppress fugitive dust. Construction traffic will generally be limited to hours identified in consideration of local codes. The entire construction process for the Project is anticipated to take approximately 6 months (weather depending). (See Construction Information Letter as Attachment G).

After completing construction, there will be minimal to no traffic generation from the Project. The Project Site is unoccupied. This is an existing, passive public utility use. The duration of any impacts in a particular location along the 2.8-mile line will be short. The magnitude of potential impacts is relatively small in the context of the overall Project and will be limited by the measures incorporated as noted above. The importance of impacts, in light of the short term and the number of properties affected, is also small. There will be no significant adverse impacts on traffic.

Impact on Energy

The proposed replacement Project is necessary to maintain reliable electrical service in the region. Other than routine use of fuel during construction, the Project will not create a greater demand for energy, but rather will result in improving energy resources and service reliability in the area.

Noise and Odor Impact

The Project will not result in unreasonable noise, odor, or light at or around the Site.

No change in long-term ambient noise level is anticipated since the reconstructed transmission line does not include any new noise-generating facilities or equipment. The transmission line and ROW are also unoccupied. Minor temporary increases in noise levels that are typical of projects in the area may occur during the course of construction from the necessary use of construction equipment (e.g., bulldozers, dump trucks, and cement mixers). To reduce noise levels from equipment, the use of functional mufflers on all equipment will be a requirement of the Project.

Construction of the Project is anticipated to take less than 6 months, and such sounds are expected to only last a portion of that period. Indeed, for this linear 2.8-mile transmission line replacement, the work will generally occur in stages as the crews move down the ROW in sections to work on the replacement of poles and will only last in an area for a few weeks in total. (See Construction Information Letter as Attachment G). Therefore, the scale and magnitude of the potential temporary impacts are minor. Any potential adverse impacts resulting from a lengthy construction schedule will thus be avoided.

With respect to odor, Project construction may result in some temporary and localized odors typically associated with project construction (e.g., operation of construction machinery). Such impacts would be minor and short term. Operation of the Project will not generate any odors.
The Applicant is coordinating with the Federal Aviation Administration (FAA) regarding the pole replacements, including the pole directly adjacent to the Dutchess County Airport.
The duration of these potential impacts is temporary. In the context of the overall operation, which is rebuilding of an existing transmission line that is approximately 2.8 miles long within an existing utility ROW, the magnitude and importance of these potential impacts are relatively small, and the potential impacts have been limited by the measures incorporated in the proposed action for Project management. Thus, no significant adverse impacts are anticipated.

Impact on Public Health

The entire Project Site has been appropriated to public utility use. The Site does not include, or is not subject to, components which could be considered impacts to public health (per SEQRA EAF Part 2) such as site remediation, institution controls, solid waste facilities, etc. The Project is designed and will be installed in accordance with all state, federal and local regulations that apply to this type of public utility infrastructure.

Consistency with Community Plans and Character

There will be no adverse impacts from the Project on community plans or existing community character.

The portion of the ROW within the Town of Poughkeepsie is zoned R-20. Public utilities are permitted uses in the R-20 district as-of-right. The Zoning Administrator for the Town of Wappinger issued a zoning decision, dated November 19, 2018, confirming that the portion of the Project within the Town of Wappinger is also permitted subject to obtaining site plan approval from the Wappinger Planning Board. The Project is not inconsistent with any community plan.

The Project Site is a public utility ROW that has been appropriated for such utility use for almost one hundred years. The proposed Project is the replacement and reconstruction of existing critical electric infrastructure to serve the existing community. The Project will not affect local population or the growth of nearby communities. It is also not anticipated to change the character of the landscape since this is a replacement of an existing transmission line within an existing cleared ROW. The Site currently contains substantial public utility infrastructure including multiple utility lines and equipment made up of a mixture and diversity of materials of various poles resulting from their age and degradation.

This environmental analysis for the proposed action includes an extensive viewshed analysis (see Visual Report in Attachment I) containing a series of photographs including visual simulations of appearance of the proposed Project). The field assessment, as summarized in the photo log and Viewpoint Location Map, provides an objective assessment of typical landscape zones along the ROW (e.g., utility, residential, commercial, agricultural). This effort, in conjunction with the other visual assessment methods such as the preparing of photo-realistic simulations, offers a broad perspective of the entire ROW from which to assess potential impact on the community. As noted in the Visual Report, the area of potential visibility of any portion of the KM Line on the Site following completion of the proposed Project increases by less than 1% and will continue to not be visible from any designated visual resources within a 1-mile radius. In other words, the reconstructed KM Line will be visible from the same areas from which the existing Line is visible (see analysis in the Visual Report). While there may be isolated instances where a change in pole height is proposed, as documented in the Plan and Profile drawings, and such change could be perceptible from certain off-site locations, the proposed changes will be apparent only from a

limited number of points, nearly of all of which have existing views of the existing line and utility ROW. Such visibility is further limited to obscured views where only portions of equipment may be seen through obstructions. Moreover, the change in some of the pole heights is required to meet utility design standards and requirements and does not create a significant adverse impact on community character for the following reasons: First, this is an existing utility line which has existed for almost one-hundred years. The proposed Project is a replacement and reconstruction of that line. The replacement line will be visible from the same areas from which the existing line is visible, including road crossing and/or some from residential or open space properties which have been and are currently located near the line. Second, in the outdoor setting, seen against other dominant landscape features and generally long views, the change in pole heights are *de minimus*, as the replacement poles generally do not exceed the height of the adjacent wooded areas. Third, there are other aspects of the Project, which improve the visual character of the area, such as the full replacement of all poles with dark brown steel poles of a uniform appearance in a color that fits into the landscape and consolidation of existing distribution lines at certain locations.

In conclusion, the proposed Project is "unoccupied" utility infrastructure that is necessary to serve the community. The Project does not require any water usage and will not generate sewage, effluent, or trash. There will be no increase in traffic and no need for additional parking. All construction will be contained within the existing Central Hudson property and/or ROW, without any hindrance to the surrounding parcels. The installation of the Project will not alter the use of the land adjacent to or in the surrounding areas or require any change to transportation routes. Public utilities exist on the ROW and have for almost one-hundred years. The existing transmission lines and poles show substantial degradation and must be replaced. The poles will be replaced generally in their present locations. There will be no increase in the overall width of the ROW and no increase in the number of poles. There is no change in volume or intensity of the use, and the line will remain 69kV. Thus, potential impacts to the surrounding area will be minimal, if any, during construction and non-existent during regular operations of the replacement infrastructure. Further, the Project will not result in a meaningful increase in the area where the transmission line

is visible (i.e., the net increase in area from which the lines are visible will increase by less than 1% (or 0.3%). Views of the Project will largely be limited to the areas at which the existing infrastructure is already visible. Overall, visual and neighborhood character impacts of the replacement Project have been avoided and minimized by the use of an existing ROW, which results in very limited additional clearing. The presence of existing forest vegetation will also continue to significantly screen the Project from public vantage points (see viewshed maps in Attachment I), and the proposed dark brown color and shape of the replacement structures will generally blend well with the surrounding landscape. Consequently, the Project will not have an adverse impact on the growth or character of Towns or the adjacent neighborhoods. In addition, the Project provides the community-wide benefits of delivering reliable electric service to nearby neighborhoods and businesses.

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