



MILL POINT SOLAR I PROJECT
ConnectGen Montgomery County LLC

Appendix 15-4
Drainage Remediation Plan

Revised August 2024

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1.0 Introduction

This Drainage Remediation Plan (the Plan) was developed by ConnectGen Montgomery County LLC (the Applicant) to avoid and mitigate impacts to surface and subsurface drainage associated with the construction and operation of Mill Point Solar I Project (the Project or Facility), a proposed 250-megawatt (MW) utility-scale solar energy generating facility in the Town of Glen, Montgomery County, New York. Outlined within this Plan is the identification of surface and subsurface drainage features, the likelihood of impacts, as well as anticipated repair methods.

2.0 Avoidance Measures and Identification of Surface and Subsurface Drainage

Prior to any development and early in the design process, identifying surface and subsurface drainage systems is critical to the avoidance, minimization, and mitigation of potential damages. The Applicant will continually coordinate with landowners to obtain and document drain tile system locations within the privately owned land leased for the Facility and ensure working conditions during construction and operation. The Applicant contacted the Montgomery County Soil and Water Conservation District (SWCD) to inquire if they had record of surface or subsurface drainage features within the county. The Montgomery County SWCD confirmed that they do not have records of surface or subsurface drainage features within the county. The Applicant commenced work identifying drainage infrastructure through the deployment of the Agricultural Use Landowner Survey and through the National Center for Atmospheric Research database which uses multiple US Department of Agriculture and US Geological Survey datasets to show a 30-meter resolution layer of suspected drain tile areas.

A third-party Environmental Monitor (EM) will be hired prior to the commencement of construction activity. Construction and restoration activities will be monitored by the EM to ensure compliance with the applicable environmental commitments and siting permit requirements. Before the commencement of construction, an overall site survey will be conducted by the Applicant's Engineering, Procurement, and Construction (EPC) contractor to locate and demarcate the exact location of Facility components to be installed. In conjunction with construction management, the EM will conduct a preconstruction site review at previously identified sensitive resources, such as the location of wetlands and streams, archeological and agricultural resources, drainage features (e.g., culverts, ditches) and known locations of agricultural tile lines, and of the proposed locations of erosion and sediment control measures. Flagging, staking, and/or fencing will define the Limits of Disturbance (LOD) and sensitive resource boundaries prior to the commencement of construction activity. Additionally, landowner-imposed panel exclusion areas will be demarcated during the preconstruction site review.

The Applicant does not anticipate permanent impacts to surface or subsurface drainage systems due to the careful siting of Facility components to avoid known locations of drainage system features.

3.0 Impacts to Surface and Subsurface Drainage

As previously discussed, the Applicant will coordinate with landowners to identify existing surface and subsurface drainage systems to avoid, minimize, and mitigate impacts during construction and operation. This commitment to landowners/farm operators is aimed to minimize impacts to agricultural operations and address unanticipated impacts to the drainage systems should they occur.

If impacts occur to surface or subsurface drainage during construction or operation of the Facility, flags and stakes will be used to identify damaged components until an evaluation of damage and repairs are completed. Damage to drainage systems may not be immediately visible or apparent but may become more apparent over time. Upwelling of water during high flow periods or holes along the surface above damaged drain tiles during low flow periods are indicators of potential drain tile damage. The Applicant will take the steps identified in Section 4.0 below to repair damaged drainage systems.

4.0 Methods of Repair

In coordination with landowners, the Applicant will record damages to drain tile systems that are identified during construction and operation of the Facility and perform repairs as described below.

Drain Tile Systems Servicing Properties Owned by Participating Landowners

The Applicant will keep record of any damages to drain tile systems that are identified during construction and operation of the Facility. Drain tile systems that service agricultural lands that will remain in production during the operation of the Facility will be repaired as described below:

- If water is flowing through the damaged tile line to be repaired, the Applicant will immediately and temporarily repair the tile line until such time that the Applicant can make permanent repairs. If the damaged tile line to be repaired is dry and temporary repairs are not necessary, permanent repairs can be completed by the Applicant within 14 business days (weather and soil conditions permitting) of the time said damage occurred. However, the exposed tile line will be screened or otherwise protected to prevent the entry of foreign materials or animals into the tile line.

- All subsurface drains subject to repair shall be repaired or replaced with materials of equal or higher quality and of equal or larger inside diameter as those which were damaged or removed. Efforts shall be made to maintain the tile line to its original alignment/gradient.
- A typical detail for repair of existing drain tiles is provided on Sheet MPS-C-107-03 of Revised Exhibit 5, Revised Appendix 5-1, Design Drawings. Drain tile repair will be performed in accordance with the 2019 New York State Department of Agriculture and Markets (NYSAGM) Guidelines for Solar Projects.
- Following completion of the work, the Applicant will be responsible for correcting or paying for the correction of the performed tile repairs that fail post-construction for a period of 24 months post construction. Impacts to drain tiles that occur after the two-year monitoring period will be addressed via the Complaint Resolution Plan (see Section 5 below). The Applicant will not be responsible for tile line repairs performed independently by the landowner unless previously agreed to under a separate agreement between the Applicant and landowner. Drain tile systems that service lands where Facility components will be located will not be replaced or repaired until the Facility is decommissioned, unless the damage impact offsite properties or onsite drainage patterns. Any traceable offsite impacts will be resolved via the Complaint Resolution Plan (see Section 5 below). Once the Facility is decommissioned, any drain tile system that was damaged during construction and not repaired, will be restored to its pre-construction condition to support future agricultural production. The Applicant will be responsible for correcting or paying for the correction of the tile repairs.
- Reasonable efforts shall be made to maintain the tile line to its original alignment/gradient.

Drain Tile Systems Servicing Properties Owned by Non-participating Landowners

The Applicant is not aware of any drain tile systems that extend outside the Facility Site into non-participating parcels. If any drain tile systems with connections to non-participating parcels are impacted by the construction and operation of the Facility, the Applicant will repair any damages as soon as reasonably practicable. The Applicant will perform repairs to these damaged drain tile systems as described above.

5.0 Complaint Resolution

The Applicant is committed to addressing concerns regarding drain tile repair and maintenance during construction, operation, and decommissioning of the Facility. In accordance with §900-

10.2(e)(7) of the Section 94-c regulations, the Applicant will prepare a Complaint Management Plan for the Facility that will include guidance on registering a complaint, contact information, public notification procedures, complaint resolution procedures, and guidelines for tracking complaints. Landowners may express their concerns via email, phone call, or the contact form on the Project website (<https://www.millpointsolari.com/contact/>). The Applicant will work to address concerns in timely manner and in accordance with the Complaint Management Plan.