



**Entergy Texas, Inc.**

**Alternatives Analysis**

**Orange County Advanced Power Station Project**

**June 2022**

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## Alternative Sites Analysis

### 1.0 PURPOSE AND NEED FOR ACTION

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#### 1.1 Project Purpose

Entergy Texas, Inc. (ETI) provides retail electric service to more than 450,000 customers in 27 counties in the state of Texas. However, ETI's load is continuing to grow, while at the same time roughly 1,100 megawatts (MW) of legacy generation at ETI's Sabine Plant is nearing deactivation. For continued provision of reliable service in ETI's Eastern Region, ETI must plan to replace the soon-to-retire Sabine Plant with physical, in-region capacity by the time the Sabine units are expected to deactivate. ETI has an obligation to make investments that ensure its ability to provide reliable, sustainable, and affordable service to its customers. Therefore, the purpose of the Orange County Advanced Power Station Project (Project) is to construct and operate a new modern power generation facility that will increase ETI's capacity to serve its customers more reliably, including those that prefer more efficient and sustainable energy sources.

The Project is a foundational component of ETI's resource adequacy and fleet modernization plan. The Project would provide 1,215 MW of modern dispatchable generation in Texas to help meet the resource needs of ETI's customers in a reliable and economic manner, support and promote the Southeast Texas economy, and best position customers for the future. In addition to being the most efficient generator in ETI's fleet, the Project would be capable of co-firing 30 percent hydrogen by volume upon commercial operation and thus provide an opportunity for a significant amount of even cleaner dispatchable energy. The new turbines, even if run on 100 percent natural gas, would provide reliable, dispatchable power at a more efficient rate than the units they would be replacing and emissions per unit of power would be much lower in general. The Project's dual fuel capability and ability to utilize ETI's Spindletop fuel storage facility would provide significant and sustainable economic and reliable benefits to ETI customers.

#### 1.2 Need For Action

The need for reliable, physical, in-region generation has never been more apparent given ETI's recent experience with major hurricanes in 2020 and Winter Storm Uri in February 2021. In August 2020, Hurricane Laura damaged or destroyed all major transmission tie lines between ETI and Entergy Louisiana, LLC, which have been critical to ETI's ability to import power from the east to meet customer demand. Without the aging Sabine units and their key location in Texas, the situation for ETI customers would have been far more devastating, including a restoration of service that would have taken weeks, if not a month, longer to complete.

The Project would address multiple critical resource planning needs in a timely manner over a wide range of evolving future market and federal policy conditions. These needs include new physical capacity from a clean dispatchable energy resource in proximity to both retiring generation and increasing industrial load; regional reliability and operational flexibility; less reliance on transmission capacity in the West of the Atchafalaya Basin (WOTAB) load pocket, including during emergency events; enhanced storm response; portfolio diversity; and mitigation of risk associated with an over-reliance on the Midcontinent Independent System Operator, Inc. (MISO) capacity and energy markets, among others. The proposed Project would meet over 75 percent of the anticipated 2026 capacity need and would serve as a new, more efficient, and reliable generation source, replacing roughly 1,100 MW of capacity at the aging, less-efficient Sabine Plant infrastructure, built in 1960.

As noted above, the Project would also be capable of co-firing up to 30 percent of hydrogen upon commercial operation. Recent experience during Winter Storm Uri showed that access to natural gas can be limited and its cost can increase significantly during severe weather. The reliability and economic benefits of dual fuel capability were recently recognized by the Texas Legislature when it unanimously passed House Bill 1510, which requires the Public Utility Commission of Texas (Commission) to consider the economic and reliability benefits of dual fuel and fuel storage capabilities when considering approval of new generation in areas outside the Electric Reliability Council of Texas region. The Project would be well-suited to advance this policy and mitigate risk to ETI customers, as it would be capable of utilizing both natural gas and hydrogen and would take advantage of the fuel storage and swing capabilities of ETI's Spindletop storage facility. The investment in these hydrogen capabilities produce immediate reliability benefits. This benefit is also consistent with the nationwide transition toward a low-carbon economy and recognizes the investment community's and customers' evolving demand for sustainability in their operations and in the energy they use. Just as importantly, the Project's hydrogen capability would help ensure ETI's customers are well-positioned for new federal policies and market conditions over the coming decades.

The U.S. Environmental Protection Agency's (EPA) proposed Good Neighbor Plan for the 2015 Ozone National Ambient Air Quality Standards, published April 6, 2022, provides additional support for the deactivation and replacement of Sabine Units 1, 3, and 4. This proposed rule would substantially increase the stringency of the Cross-State Air Pollution Rule program by establishing reduced NOx emissions allowance budgets for fossil fuel-fired power plants in 25 states, including Texas. The rule, if finalized as proposed, would likely require significant capital

investments to install post-combustion NO<sub>x</sub> emission controls (e.g., selective catalytic reduction technology) on any coal or legacy gas units to be operated in 2026 or beyond to meet the more stringent 2015 ozone standard of 70 parts per billion. Rather than investing in expensive control equipment on the Sabine aging assets with limited remaining life, the Project would provide reliable, and clean energy in compliance with the EPA's proposed rule.

### 1.3 Scope of Environmental Analysis

Approval of the amendment to Entergy's Certificate of Convenience and Necessity (CCN) to construct the Project is subject to Chapter 37 of the Public Utility Regulatory Act (PURA), particularly PURA § 37.056. This section provides that the Commission "may approve an application and grant a certificate only if the commission finds that the certificate is necessary for the service, accommodation, convenience, or safety of the public," after considering several factors.

The factors the commission considers in a CCN Proceeding includes:

- (1) the adequacy of existing service;
- (2) the need for additional service;
- (3) the effect of granting the certificate on the recipient of the certificate and any electric utility serving the proximate area; and
- (4) other factors, such as:
  - (A) community values;
  - (B) recreational and park areas;
  - (C) historical and aesthetic values;
  - (D) environmental integrity; and
  - (E) the probable improvement of service or lowering of costs to consumers in the area if the certificate is granted, including any potential economic or reliability benefits associated with dual fuel and fuel storage capabilities in areas outside the ERCOT region (PURA § 37.056(c)).

The construction of the proposed Project satisfies these factors and would be well-suited to advance the dual fuel and fuel storage policy reflected in the recent amendments to the statutory CCN factors. Approval of the CCN amendment is merited under the relevant statutory provisions. This alternative analysis was prepared based on 33 CFR § 320.4 - General policies

for evaluating permit applications. This alternative analysis is designed to ensure careful consideration of environmental aspects of a proposed action and to make information available to decision-makers and the public before final decisions are made and actions are taken. The alternative analysis for the proposed Project presents a site-specific proposed action and alternatives in order to demonstrate the selection of the most practicable alternative with the least environmental impacts.

## **2.0 NO-ACTION ALTERNATIVE**

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Under the No Action Alternative, no changes would occur to the Project site, and there would be no affect or consequences to the environment on and around the Project site. However, under the no action alternative, ETI would not be able to meet the public need for additional energy and capacity by 2026. As a result, expected loads will continue to increase, existing generating units will reach their projected end of useful life and would require an investment and the installation of expensive post combustion controls on units with limited remaining useful life, and energy availability to the public will be insufficient to meet demand. In the event the Project is not constructed, independent energy producers may introduce additional projects that could result in greater environmental impacts than the proposed Project's alternative.

## **3.0 LOCATION ALTERNATIVES**

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In order to meet the need of the Project, siting the power generation facility proximate to the load demand and within ETI's Eastern Region is necessary. As part of the ETI portfolio analysis conducted to address the need for additional capacity, ETI performed site evaluations to identify several potential sites within the Eastern Region (an area bordered by the Texas/Louisiana state line on the east, the Gulf of Mexico on the south, the ETI planning region known as the "Western Region" on the west, and the Southwest Power Pool on the north) and selected the most practicable site with the least environmental impacts based on established criteria. The analysis provided a screening process to identify potential sites for new build generation in the Eastern Region of ETI's service territory. A total of 11 sites were evaluated and criteria-specific scores were weighted to develop a relative ranking. The evaluation criteria included several variables:

- Fuel Supply - number of pipelines in proximity, number and flexibility of suppliers, gas pressure;
- Transmission Interconnection – connections and upgrades required;
- Transmission Planning – potential to avoid future transmission projects;

- Water Supply – connection to makeup water source;
- Infrastructure – synergies of infrastructure and personnel;
- Site Suitability – proximity to residential space, cost and availability of land, teardown and land remediation;
- Environmental – attainment/nonattainment, wetlands mitigation, threatened and endangered species habitat, and cultural resources; and
- Construction costs.

Based on this criterion, a short list of four alternative sites (including the Preferred Alternative) were assessed and a comparison of the relative cost differences developed. Below is a summary of the advantages and disadvantages of the four short listed sites (**Table 1**). The names and specific locations of the alternative sites are confidential and not included below.

<b>Table 1 Location Alternatives Comparison</b>				
<b>Category</b>	<b>Alternative Site 1 (Preferred Alternative- Sabine Alternative)</b>	<b>Offsite Alternative Site 2</b>	<b>Offsite Alternative Site 3</b>	<b>Offsite Alternative Site 4</b>
<b>Site Disturbance</b>	Brownfield – ETI Owned Property	Greenfield – ETI owns approximately 25 acres adjacent to switchyard	Greenfield – None of the property owned by ETI	Greenfield – None of the property owned by ETI
<b>Construction costs <sup>a</sup></b>	Lowest Cost	+ Additional \$130 million	+ Additional \$210 million	+ Additional \$142 million
<b>Fuel Supply</b>	Onsite	New fuel compressor stations and fuel pipelines would be required to be constructed to the site.	New fuel compressor stations and fuel pipelines would be required to be constructed to the site.	New fuel compressor stations and fuel pipelines would be required to be constructed to the site.
<b>Transmission Interconnection/Planning</b>	Existing Transmission	Existing Transmission	Lacks Transmission	Existing Transmission
<b>Water Supply</b>	Water source from SRA canal already onsite.	New water wells would need to be drilled or a new water pumping station and pipeline would need to be constructed to the site.	New water wells would need to be drilled or a new water pumping station and pipeline would need to be constructed to the site.	New water wells would need to be drilled or a new water pumping station and pipeline would need to be constructed to the site.
<b>Infrastructure</b>	Existing Infrastructure	Rail Access Nearby	Lacks Infrastructure	Lacks Infrastructure

<b>Table 1 Location Alternatives Comparison</b>				
<b>Category</b>	<b>Alternative Site 1 (Preferred Alternative- Sabine Alternative)</b>	<b>Offsite Alternative Site 2</b>	<b>Offsite Alternative Site 3</b>	<b>Offsite Alternative Site 4</b>
<b>Proximity to Residences</b>	Proximity to neighbors north/northeast of property boundary only	Proximity to neighbors to the north, east and west, contingent on specific site purchased	Proximity to neighbors north/northwest of property boundary	Proximity to neighbors northwest and southeast, contingent on specific site purchased
<b>Environmental</b>				
<b>Wetland Impacts</b>	Minimal wetland impacts on site.	Minimal to no wetland impacts on site. Additional wetland impacts would be necessary for construction of required fuel supply pipelines.	Wetland impacts high on site. Additional wetland impacts would be necessary for construction of associated infrastructure, fuel supply pipelines, and transmission interconnection.	Wetland impacts high on site. Additional wetland impacts would be necessary for construction of associated infrastructure, and fuel supply pipelines.
<b>Flooding Risk</b>	Flooding risk, mitigated through raising elevation & new floodwall/levee is being constructed around the site by USACE	Site protected by levees	Site protected by levees	Site protected by levees
<sup>a</sup> Reflected cost is representative of the value during the time of analysis and would be significantly higher.				

**3.1 Alternative Site 1 (Preferred Alternative - Sabine Alternative)**

The Preferred Alternative site is adjacent to the existing Sabine Power Station and is a viable brownfield site owned by ETI. This site is adjacent to existing infrastructure and is in proximity to transmission, fuel supply, and surface water sources minimizing the overall environmental impacts while significantly reducing construction costs. Flooding risk is mitigated by raising elevation of the site, and the U.S. Army Corps of Engineers’ (USACE) planned Orange County Project, which is planned to begin construction in 2024, will construct a floodwall/levee around the site (USACE 2022). To the east, south, and west of the property boundary are wetlands and marsh associated with Sabine Lake and the Neches River; however, these areas would likely not be significantly impacted by the Project. Although there is potential for some wetland impacts, the overall environmental impacts are low given the existing surrounding infrastructure. Additionally, neighboring residences are located only on the north and northeastern property boundary with an approximate 100-foot buffer while the rest of the surrounding area is considered developed or non-residential.



The Preferred Alternative – Sabine Alternative site location was selected due to its minimal environmental impacts given that the transmission, water, and gas infrastructure are already available due to the location within the existing Entergy Sabine Plant. The Preferred Alternative site location also provides the capability to utilize the MISO generator replacement process for replacing the retiring Sabine units for interconnection into the existing switchyard.

### **3.2 Offsite Alternative 2**

Offsite Alternative 2 is a greenfield site where ETI only owns approximately 25 acres adjacent to the switchyard and, therefore, ETI would need to purchase the balance of the property necessary for development. However, in order to provide resources, new fuel compressor stations and fuel pipelines would need to be constructed. Additionally, new water wells would need to be drilled or a new water pumping station and pipeline would need to be constructed to the site for a water source. The site is in proximity to neighboring residences on the north, east, and west boundary, contingent on the specific site purchased. Although impacts to wetlands are expected to be minimal at the site location, additional offsite impacts associated with necessary fuel compressor station, and fuel and water pipelines would result in offsite impacts to wetlands and other resources. Offsite Alternative 2 was not selected as it is a greenfield site needing additional fuel and water line construction resulting in higher environmental impacts and increased costs.

### **3.3 Offsite Alternative 3**

Offsite Alternative 3 is a greenfield site that is not located on property owned by ETI and is not surrounded by infrastructure. This alternative has the potential for significant wetland impacts. New water wells would need to be drilled or a new water pumping station and pipeline would need to be constructed to the site for a water source. Additionally, new fuel compressor stations and fuel pipelines and transmission lines would need to be constructed to the site. The site is also in proximity to neighboring residences on the north, northwest boundary. Offsite Alternative 3 was not selected as it is a greenfield site, lacks surrounding infrastructure, and needs additional fuel, transmission, and water line construction resulting in higher environmental impacts and increased costs.

### **3.4 Offsite Alternative 4**

Offsite Alternative 4 is a greenfield site with similar siting advantages/disadvantages of Offsite Alternative 3. Offsite Alternative 4 is also not located on property owned by ETI and is not surrounded by infrastructure. This alternative has the potential for significant wetland impacts.

New water wells would need to be drilled or a new water pumping station and pipeline would need to be constructed to the site for a water source. Additionally, new fuel compressor stations and fuel pipelines and transmission lines would need to be constructed to the site. The site is also in proximity to neighboring residences on the northwest and southeast boundary, contingent on the specific site purchased. Offsite Alternative 4 was not selected as it is a greenfield site, lacks surrounding infrastructure, and needs additional fuel and water line construction resulting in higher environmental impacts and increased costs.

#### **4.0 ONSITE ALTERNATIVES**

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Following the exclusion of offsite alternatives and the conclusion that siting the Project at the existing Sabine Plant (Preferred Alternative – Sabine Alternative) represents the best option as it addresses the long-term needs of ETI's customers and includes the least environmental impacts given the transmission and gas infrastructure are readily available, onsite alternatives were evaluated. Three onsite alternative layouts were evaluated for the proposed Project within the existing Sabine Plant property (**Attachment 1 – Page 1**). Onsite selection was narrowed down based on several variables:

- Avoidance of impacts to existing Sabine Plant infrastructure (i.e., transmission lines, gas lines, substation, etc.);
- Ease of connectivity to existing Sabine Plant infrastructure;
- Access to surface water for cooling water and wastewater discharges;
- Proximity away from neighboring communities;
- Avoidance and minimized impacts to waters of the U.S.; and
- Avoidance and minimized impacts to other natural resources (i.e., forested areas, threatened and endangered species habitat, cultural resources, etc.).

Portions of the onsite alternatives and associated impacts are consistent for all three onsite alternatives. Approximately 12.6 acres of proposed laydown areas and the existing dock are included in all proposed onsite alternatives. These impacts are incorporated in the Total Land Disturbance and Wetland Impacts below for the alternative analysis (**Table 2**). Additionally, approximately 0.001 acre of impacts to a Section 10 waterbody (Sabine Plant intake canal) is consistent with all onsite alternatives due to the need to discharge waste water from the cooling tower regardless of the alternative constructed. Lastly, all onsite alternatives would require the relocation or rebuilding of existing transmission lines within the Sabine Plant. However, impacts

associated with transmission line construction are anticipated to be minimal and consistent across all options. Thus, these impacts were excluded from the onsite alternative analysis, not presented in **Table 2**, nor are they discussed further.

<b>Table 2 Onsite Alternatives Comparison</b>			
<b>Category</b>	<b>Alternative Site 1</b>	<b>Alternative Site 2</b>	<b>Alternative Site 3</b>
<b>Total Land Disturbance (acres)<sup>a</sup></b>	76.63	76.91	77.51
<b>Wetland Impacts – National Wetland Inventory (acres)<sup>b</sup></b>			
<b>Non-forested (PEM/PSS) Wetland</b>	3.04	16.31	3.69
<b>Estuarine/Marine/Riverine Wetland</b>	1.42	0.35	3.61
<b>Pond</b>	13.45	0.41	11.98
<b>Forested (PFO) Wetland</b>	0.00	28.89	0.69
<b>Total NWI Wetland Impacts</b>	17.91	45.96	19.97
<b>Jurisdictional Wetlands and Waterbodies<sup>c</sup></b>			
<b>Wetland Loss (acres)</b>			
<b>Non-forested (PEM/PSS) Wetland</b>	1.67	N/A <sup>d</sup>	4.73
<b>Forested (PFO) Wetland</b>	0.11	N/A <sup>d</sup>	3.39
<b>Total Wetland Impacts</b>	1.78	N/A <sup>d</sup>	8.12
<b>Waterbody Loss (acres)</b>			
<b>Minor Waterbodies Impacted<sup>e</sup></b>	0	0	0
<b>Intermediate Waterbodies Impacted<sup>f</sup></b>	0	0	0
<b>Major Waterbodies Impacted<sup>g</sup></b>	0	0	0
<b>Ponds Impacted</b>	0	0	0
<b>Section 10 Waterbodies (acres)<sup>h</sup></b>	0.001	0.001	0.001
<b>Least Environmentally Damaging Practicable Alternative</b>	YES	NO	NO

<b>Table 2 Onsite Alternatives Comparison</b>			
<b>Category</b>	<b>Alternative Site 1</b>	<b>Alternative Site 2</b>	<b>Alternative Site 3</b>
PEM - palustrine emergent PSS - palustrine scrub-shrub PFO - palustrine forested N/A – Not Applicable  <sup>a</sup> Total Land Disturbance does not consider existing roads or facilities that would be utilized during construction or disturbances associated with rebuilding/relocating transmission infrastructure located within the site. Impacts associated with transmission line construction are considered temporary and would apply to all three options. <sup>b</sup> U.S. Fish and Wildlife Service, 2022 <sup>c</sup> Jurisdictional wetland and waterbody data is based on pre-jurisdictional and jurisdictional determination features issued by the USACE on June 8 <sup>th</sup> , 2022. <sup>d</sup> Based on the National Wetland Inventory (NWI) data and wetland characteristics visible on aerial imagery, an onsite wetland delineation survey was not conducted and the USACE jurisdictional determination did not include Option 2 and, thus, jurisdictional data is unavailable. <sup>e</sup> Minor waterbodies are those with a crossing width of 10 feet or less. <sup>f</sup> Intermediate waterbodies are those with a crossing width of greater than 10 feet and less than 100 feet. <sup>g</sup> Major waterbodies are those with a crossing width of 100 feet or greater. <sup>h</sup> All of the considered alternatives will require an outfall structure within a Section 10 waterbody and will include the construction of minor rip rap.			

**4.1 Onsite Alternative 1 (Preferred Alternative)**

The Onsite Alternative 1, referred to as the Preferred Alternative throughout this discussion and on the Onsite Alternatives Mapping provided in **Attachment 1 – Pages 2 and 5**, will require a disturbance area of 76.63-acres located adjacent to the Sabine Plant Administrative Building and parking areas. ETI designed the Preferred Alternative to avoid impacts on environmental resources (i.e., wetlands and waterbodies) to the greatest extent practicable, in addition to utilizing previously disturbed areas associated with an old tank farm. Due to the location directly adjacent to the Sabine River Authority (SRA) canal, impacts due to access of a raw water source are minimized. There are several potential pathways for wastewater discharge from the eastern portion of property. The Onsite Alternative 1 would impact 1.69 acres of jurisdictional wetlands, and approximately 0.001-acre of a Section 10 waterbody would be impacted by the outfall structure.

Although Onsite Alternative 1 is approximately 38 percent forested habitat, this area has been previously disturbed and is not preferable habitat to threatened and endangered species. Additionally, this alternative site avoids impacts to a greater number of wetlands compared to the other proposed alternative sites and avoids impacts to the estuarine emergent marsh delineated on the southeastern boundary of the property. Residences are located within approximately 300 feet; however, natural tree barriers exist and will be maintained to reduce noise and visual impacts.

Onsite Alternative 1 was selected due to its minimal environmental impacts given that it utilized previously disturbed areas associated with an old tank farm. The Preferred Alternative onsite location also provides ease of access to raw water and wastewater discharge locations, while minimizing impacts to wetlands and waterbodies.

#### **4.2 Onsite Alternative 2**

The Onsite Alternative 2 is located in an undeveloped 76.91-acre site on the northwestern portion of the property (**Attachment 1 – Page 3**). This location poses several technical challenges for design and construction. Access to this site is inhibited by multiple transmission and pipeline corridors, which would require mitigation and coordination during construction in order to adequately cross these corridors. The water source for this location would also include the SRA canal; however, the canal is not directly adjacent to the site. Therefore, a means of transferring water from the canal across the main access road and a large transmission corridor would be required, which presents a technical challenge to the Project that would require further impacts and a significant investment to overcome. Wastewater discharge would still need to be transported approximately 0.4 mile to the southeastern Section 10 waterbody; therefore, the distance between Onsite Alternative 2 and the discharge location would necessitate further environmental impacts.

The Onsite Alternative 2 was excluded as an alternative and from surveys based on National Wetland Inventory data as it would impact 45.96 acres of wetlands; therefore, jurisdictional wetland and waterbody data is unavailable. Onsite Alternative 2 is approximately 68 percent forested habitat; however, this area has been previously disturbed and is likely not preferable habitat to threatened and endangered species. Residences are located within approximately 250 feet with fewer natural tree barriers that can be maintained to reduce noise and visual impacts.

Onsite Alternative 2 was not selected as it is not the alternative with the least environmental impacts due to it being located within a heavily forested area with abundant wetlands and lacks accessibility.

#### **4.3 Onsite Alternative 3**

The Onsite Alternative 3 consists of a disturbance area of 77.51-acre northeast of the Sabine Plant Administrative Building and parking areas and utilizes a portion of the previously disturbed areas associated with an old tank farm (**Attachment 1 – Pages 4 and 6**). Although containing fewer obstacles than Onsite Alternative 2, access to this site is also inhibited by one transmission

corridor and several pipeline corridors, which would require mitigation and coordination in order to adequately cross during construction. Due to the location directly adjacent to the SRA canal, impacts due to access of a raw water source are minimized. There are several potential pathways for wastewater discharge from the eastern portion of property.

The Onsite Alternative 3 would impact 8.12 acres of jurisdictional wetlands. Although Onsite Alternative 3 is approximately 39 percent forested habitat, this area has been previously disturbed and is not preferable habitat to threatened and endangered species. However, approximately 3.11 acres of estuarine emergent wetlands would be impacted, which could serve as potentially suitable Eastern Black Rail habitat. This would result in additional surveys prior to construction and additional coordination with the U.S. Fish and Wildlife Service. Residences are located within approximately 300 feet; however, natural tree barriers exist and will be maintained to reduce noise and visual impacts.

Onsite Alternative 3 was not selected as it would impact an additional 6.36 acres of jurisdictional wetlands compared to the Preferred Alternative, including 3.11 acres of estuarine emergent wetlands.

## **5.0 CONCLUSION**

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If the Project is not constructed, ETI will not have the ability to provide 1,215 MW of modern dispatchable generation in Texas to help meet the resource needs of ETI's customers. Therefore, the purpose and need of the Project would not be met.

ETI conducted an alternative analysis for the proposed Project for the purpose of identifying the most environmentally sound and technically feasible options. These alternatives were evaluated using information obtained from field surveys and desktop analysis of the surrounding environment, which employed aerial photography, and NWI data. For the reasons discussed in the preceding sections, ETI concludes that the Preferred Onsite Alternative located adjacent to the existing Sabine Power Station is the least environmentally damaging alternative under the 404(b)(1) Guidelines and is the environmentally preferred alternative.

## **6.0 REFERENCES**

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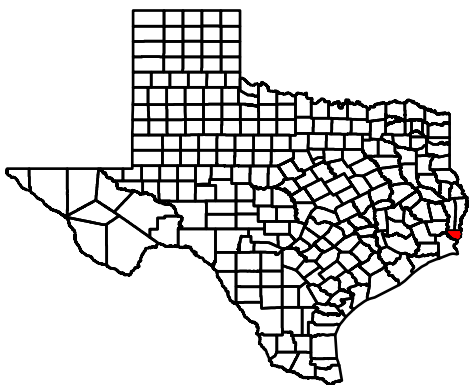
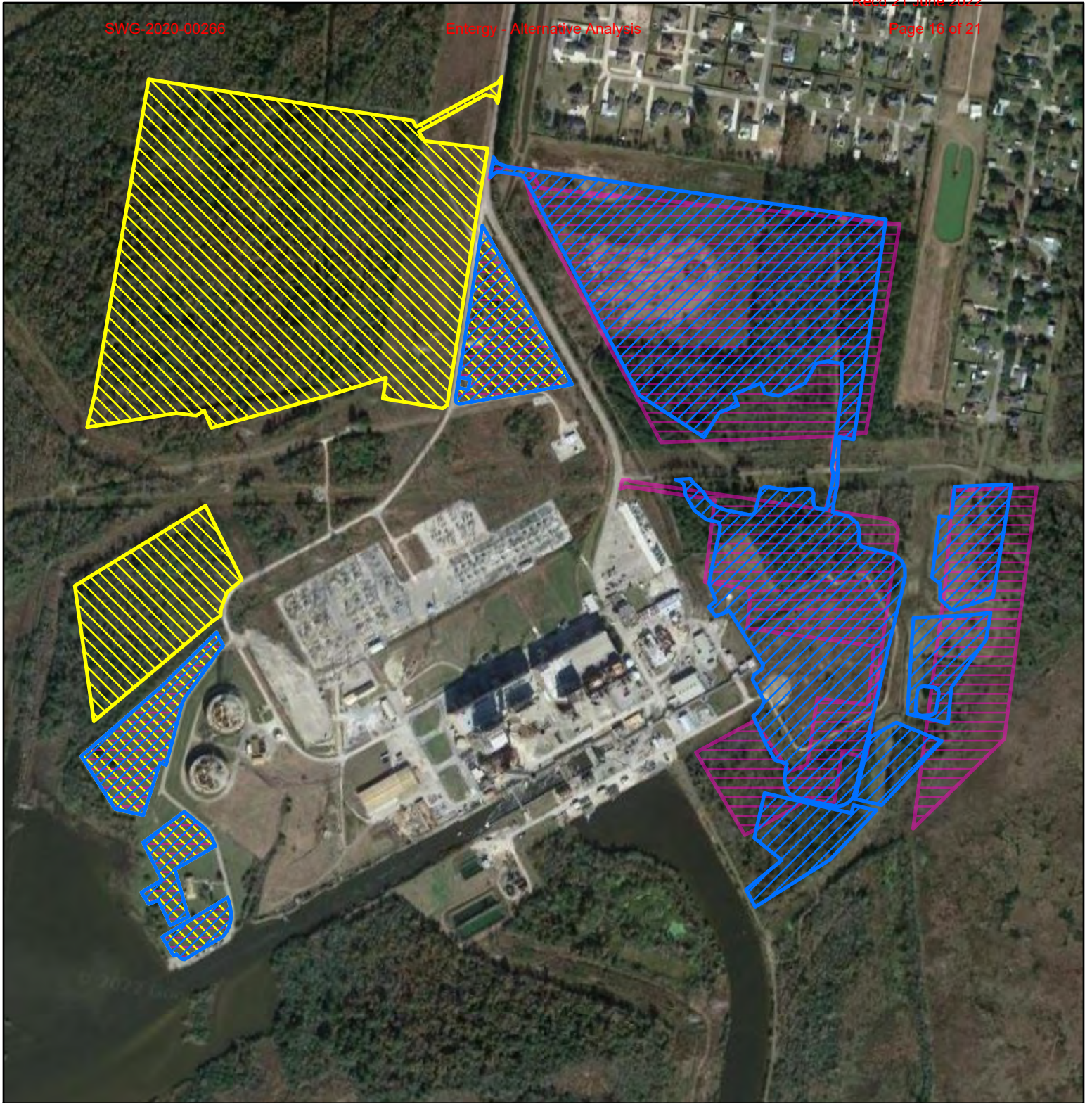
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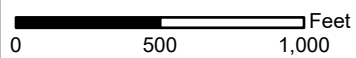
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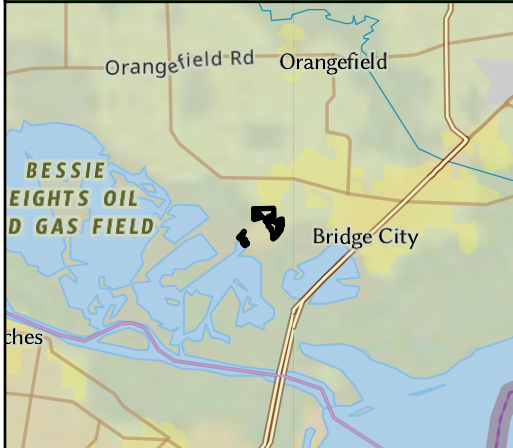
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-  Onsite Alternative 2
-  Onsite Alternative 3



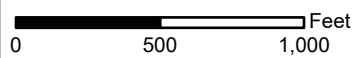
**Onsite Alternatives Overview Map**  
**Orange County Advanced Power Station Project**  
**Entergy Texas, Inc.**  
**Orange County, TX**

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NAD83 TX SC ft	Date: June 2022





- Onsite Alternative 1
- NWI



**Onsite Alternative 1  
NWI Map  
Orange County Advanced Power Station Project  
Entergy Texas, Inc.  
Orange County, TX**

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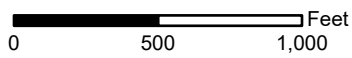
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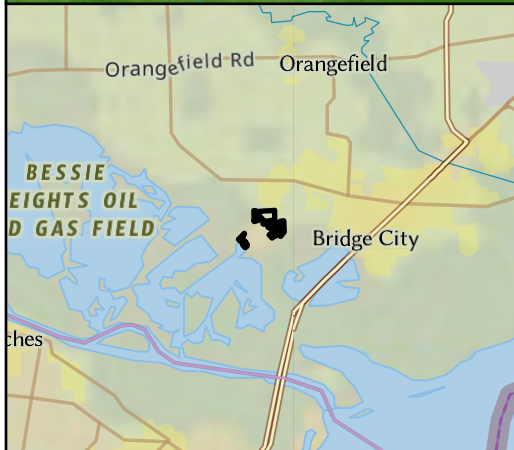
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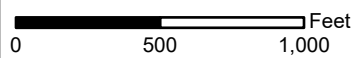
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NWI Map  
Orange County Advanced Power Station Project  
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Orange County, TX**

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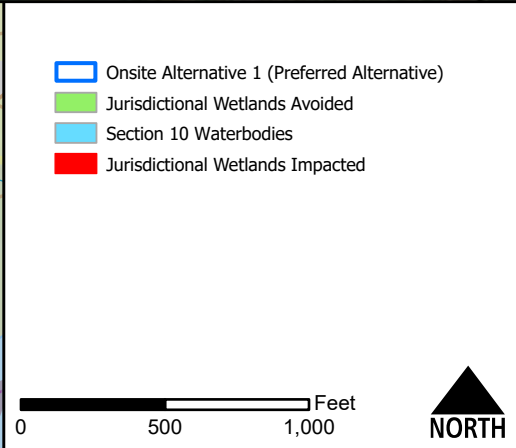
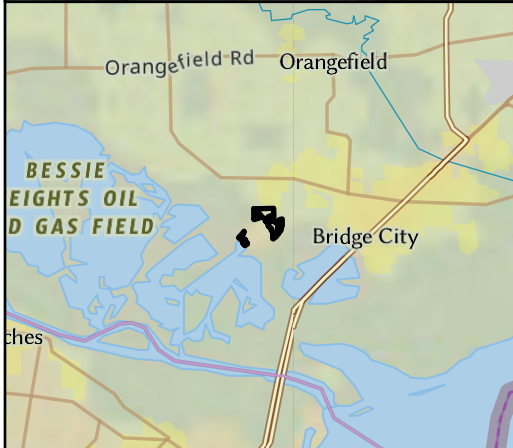
- Onsite Alternative 3
- NWI




**Onsite Alternative 3  
NWI Map  
Orange County Advanced Power Station Project  
Entergy Texas, Inc.  
Orange County, TX**

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NAD83 TX SC ft	Date: June 2022



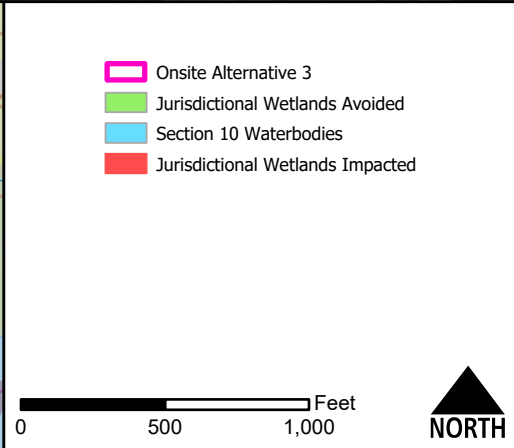
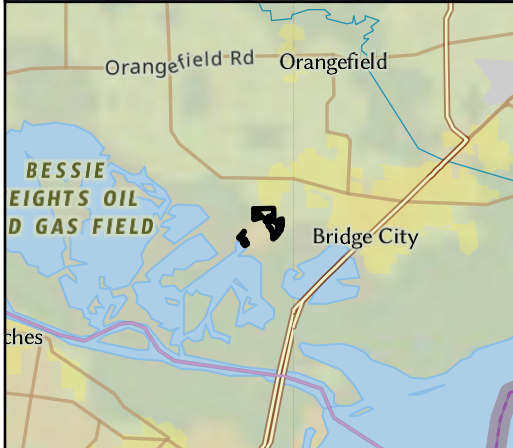
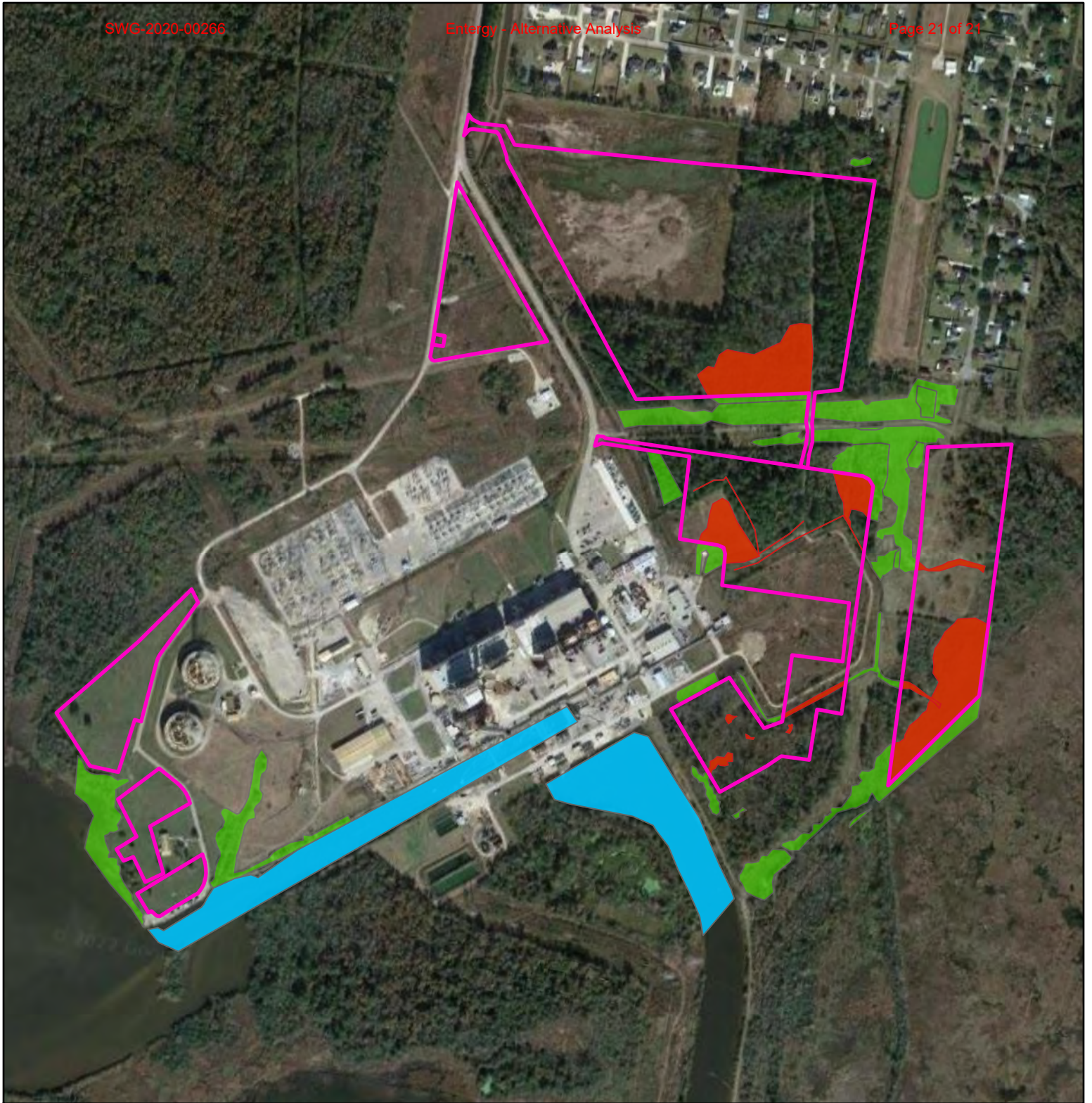





**Onsite Alternative 1 (Preferred Alternative)  
Jurisdictional Wetland Impacts Map  
Orange County Advanced Power Station Project  
Entergy Texas, Inc.  
Orange County, TX**

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NAD83 TX SC ft	Date: June 2022







**Onsite Alternative 3  
Jurisdictional Wetland Impacts Map  
Orange County Advanced Power Station Project  
Entergy Texas, Inc.  
Orange County, TX**

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NAD83 TX SC ft	Date: June 2022