

## Response Tracking Table for DPS Comments on the Bull Run PIP Plan

Comment Number	PIP Section <sup>i</sup>	Topic	Comment	Revision Made?	BRE Notes
1	1	Cover page	On the cover page, the Applicant describes the location of the Wind Farm as Clinton County. Staff recommends that Applicant add the towns within Clinton County where it is proposing the Wind Farm be located.	Yes	
2	1	Project name consistency	On the cover page of the PIP Plan, the Applicant describes the name of the project as Bull Run Wind Farm and also Bull Run Wind Energy Center. Staff recommends the use of one project name throughout the PIP for consistency.	Yes	The PIP now consistently refers to the project as the “Bull Run Wind Energy Center.”
3	1	Applicant name consistency	The Applicant, Bull Run Energy LLC refers to itself as "the Applicant" and does so throughout the PIP; however, in section 2.1 the Applicant refers to itself as "BRE." The Applicant should be consistent in how it refers to itself.	Yes	The document now uses “BRE” instead of “Applicant.”
4	2.1	Headquarters location	Applicant information should include a statement on where Bull Run Energy and Invenergy are respectively headquartered.	Yes	
5	2.1	NYPA acronym	The first reference to the New York Power Authority should include the acronym "NYPA" as NYPA is referred to later on in the PIP.	Yes	
6	2.1	Typo	The word "to" needs to be inserted before "the New York Power Authority."	Yes	
7	2.2	Article VII	The description states that the project will include a 230-kV switchyard and overhead 230-kV interconnection line approximately four miles long. The PIP Plan should explain that this transmission line will be subject to Public Service Law Article VII, rather than the Article 10 process; and that the transmission line is considered a "related facility."	Yes	Section 2.2 now explains that the transmission line subject to Public Service Law Article VII. BRE is unsure of the implication of identifying the line as a “related facility” and has opted not to make that change.
8	2.2	Article VII schedule	The PIP Plan should include a statement of the Applicant's intent as to the timing of the permitting processes for the Wind Project and the Transmission Line.	Yes	Section 2.2 now indicates BRE intends to submit both applications concurrently.
9	2.2	Article VII outreach activities	The Applicant should consider integrating or combining outreach for the overall project, including both generating and transmission facilities, and describe outreach efforts that will be used to address the overall Project development.	Yes	Outreach activities will discuss the wind project and the transmission facilities.
10	2.2	Article VII PIP integration	Outreach efforts, and development of information for the Preliminary Scoping Statement, should include information regarding construction and operation of both component facilities as findings regarding cumulative impact assessments are required by Article 10, PSL §168.2.	Yes	Section 2.2 now states that PIP outreach activities will describe both the transmission line and the wind energy facility.
11	2.3	Study Area increase for cumulative impacts	The Study Area should be extended as appropriate to address impacts that may be cumulative with other wind energy projects in the Clinton - Franklin County vicinity of the proposed Project Study Area.	Partly	If areas in the Study Area could experience cumulative impacts from other operating wind farms, the applicant will include these impacts in its studies.  Based on the Jericho Rise project areas shown in its DEIS, there are

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					<p>some areas of the Bull Run Study area that may be within 5 miles of the Jericho Rise project area and thus may need to be studied for cumulative impacts. As part of its studies, BRE will attempt to identify the latest plans for Jericho Rise so that any cumulative impacts can be studied with best available information on the two projects.</p> <p>BRE does not, however, believe it is appropriate to expand the study area beyond the five mile buffer that Article 10 policies assume is the area where impacts are expected to occur from BRE's Project.</p> <p>BRE has added the communities in the areas of potential cumulative impacts to its stakeholder list, as recommended by another DPS comment.</p>
12	2.3	Lyon Mountain	Studies should address a larger area, such as visual impact on Adirondack Park mountain-top location at Lyon Mountain as was assessed in the Environmental Impact Studies for the Noble Environmental Power wind projects in Clinton, Ellenburg, Chateaugay, and Altona, as well as the Marble River Project immediately adjoining the Bull Run Project Area.	Partly	The Adirondack Park Agency (APA) is listed as a stakeholder. As part of BRE's consultation with APA, BRE and APA will discuss areas of special interest, including those that may be outside of the Study Area, for which additional visual impact studies may be appropriate.
13	2.3	Canada	The PIP Plan indicates that the Study Area will be confined to the areas within the United States (U.S.). However, the Study Area should not be truncated at the U.S.-Canada border. Consideration of visual, historic and other resources, as well as appropriate Stakeholders, should be identified within the 5 mile distance zone regardless of the location of the State boundary.	Yes	The definition of Study Area in Section 2.3 is revised to include areas of Canada within five miles of the expected location of Project facilities.
14	3.1	Stakeholder removals	When describing its methodology to identify Stakeholders, the Applicant indicates that "it will adjust the stakeholder list to remove parties that express little to no interest in the Project. ... "It is not, however, incumbent on the stakeholder to "express interest" to remain a stakeholder. The Applicant should not remove an identified stakeholder from its list unless expressly asked to do so.	Yes	The updated PIP has removed the sentence on removal of stakeholders from the list. BRE will not encourage parties to be removed from the stakeholder list, and it will not remove a stakeholder from its list unless the stakeholder expressly requests to be removed.
15	3.1	Stakeholder additions	The Applicant noted that it would add new Stakeholders that contact the Applicant. In what way will the Applicant proactively provide opportunities for this type of contact - i.e. collect physical/email addresses through the project website, sign-in sheets at outreach events, toll-free number, etc.? Outreach materials developed for the project should indicate how an interested party can join the project stakeholder/contact list.	Yes	A new section has been added to explain how interested individuals or groups will be added to the stakeholder list.
16	3.1	Jericho Rise	As noted in Section 2.3, there are additional wind energy projects in the	Yes	BRE added boards for the area where the Jericho Rise project is

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		Communities	Franklin/Clinton County area. A group should be organized that includes the host municipalities/Stakeholders for these projects so they can be kept informed of project developments and participate in consultations regarding potential cumulative impacts. Specific organizations/ Stakeholders are identified in Staff comments regarding Appendix A.		being developed to its stakeholder list. Specifically boards for Franklin County, Town of Bellmont, Town of Chateaugay are added.
17	3.1	Town and County Boards	The Applicant should clarify what is meant by "legislative bodies," i.e. does this include local Supervisors/Executives and all board members?	Yes	The discussion of host community stakeholders has been revised to remove the term "legislative bodies" and to clarify BRE's plans to communicate with the full boards and their supervisors or points of contact.
18	3.1	Highway Departments in Study Area	The description indicates that the Applicant will include these departments within the Project Area. Staff recommends that this list be expanded to include the entire Study Area.	Yes	The PIP text has been revised to indicate highway departments in the Study Area will be in the stakeholder list. However, the areas of the Study Area are all covered by highway departments that have areas in the Project Area. To be conservative, BRE has added the highway departments for Franklin County and the Town of Chateaugay to the stakeholder list, even though these departments cover areas that abut but don't go into the Study Area.
19	3.1	EMS Resources	Section 16 NYCRR 1001.15(f) requires maps and analysis showing various resources in the Study Area including emergency response resources and facilities including police, fire and emergency medical response facilities and plans, emergency communications facilities, etc. The County Emergency Response Coordinator should also be contacted.	Yes	The Clinton County EMS Coordinator and Sheriff were included in the original PIP plan under the category of "county agency." BRE has revised the stakeholder list and PIP to change the "fire department" category to "emergency responder" and to move the County EMS Coordinator and Sheriff to this category.
20	3.1	Adjacent Municipalities	The Applicant noted that all municipalities in the Study Area were also host communities. However, as noted above, the five mile Study Area should not stop at the U.S. border and "Adjacent Municipalities" should include the Province of Quebec. Also, it is unclear from Figure 2, but it appears that the Study Area extends to Franklin County and the Town of Chateaugay and as such, they should also be included on the list of Adjacent Municipalities.	Yes	The Province of Quebec has been added as a stakeholder. The borders of the Town of Chateaugay and Franklin County abut, but do not extend into the Study Area. Nonetheless, these groups have been added as stakeholders.
21	3.1	Public Interest Groups	The Applicant notes that it will identify public interest organizations within the Project Area. This should be extended to the Study Area and include environmental organizations. The Applicant should also include business organizations here (or in its own grouping).	Yes	The PIP text has been revised to indicate public interest groups in the Study Area are considered stakeholders. Also, the "recreation" category has been merged into the "public interest group" category.
22	3.3	Adjacent Landowners	Adjacent landowners are not identified as Stakeholders in the PIP Plan. Staff recommends that the Stakeholders list be updated to include adjacent landowners as potential Stakeholders. Even if the landowners are not known at this stage, the Applicant should indicate the methodology it plans to use to identify them as locations of project components are identified.	Yes	The PIP has been revised to add a category for adjacent landowners and to make clear how BRE will identify them and notify them of project developments.
23	4	NYSDEC Acronym	The acronym "NYSDEC" needs to be spelled out as this is the first use of the word in the PIP Plan.	Yes	

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24	4	Typo	The last bullet on page 6 reads "This area is Clinton County .. ." The sentence should read "This area is in Clinton County ... ."	Yes	
25	6	PIP Goals	The PIP Plan's stated objectives should be expanded to include engagement with Stakeholders to understand the interests of various Stakeholders as they relate to the proposed Project. The Applicant's plan should be seeking specific objective information that will inform the Preliminary Scoping Statement, specifying detailed study plans to advance development of an Application.	Yes	The PIP contains a new section describing the PIP goals, including those recommended by DPS.
26	6	PIP Duration	The PIP Plan should extend through the length of the Article 10 process including the phases that occur after the submittal of the Preliminary Scoping Statement (PSS). As written, the PIP Plan only identifies activities leading up to the development of the PSS.	Yes	The PIP now specifies that it is intended to be implemented until the project begins commercial operation.
27		Outreach Materials and Schedule	Staff recommends including activities/plans for all phases in this PIP Plan, providing a description of the materials that will be developed (with the topics that will be discussed) and how they will be distributed, as well as information on the activities it anticipates conducting throughout the length of the project with an estimated schedule and timeline of events in relation to the project milestones.	Yes	Appendix C lists PIP events planned throughout the development and construction of the Project. The updated PIP contains a section describing the topics and materials to be presented at the open house and subsequent meetings.
28	6.1	Local Representatives	It is unclear who the local representatives work for - Bull Run or Invenergy.	NA	Eric Miller is a full time employee of Invenergy. Tom Hampston and Jon LaBarre are independent contractors working on hourly basis for Invenergy. All three individuals are performing work to benefit BRE, which is currently wholly-owned by Invenergy. These specifics are considered outside the scope of the PIP and thus have not been added to the PIP.
29	6.1	Toll-Free Number	The Applicant states that it maintains a toll free number but did not provide the phone number. Staff recommends that this information be provided in the PIP Plan.	Yes	The PIP now contains the toll-free number.
30	6.1	Advertising of Toll-Free Number	Also, the Applicant should identify how this contact information will be shared with Stakeholders and local residents.	Yes	The PIP has been revised to note that contact information is posted at the local office, the project specific website and will be made available at Stakeholder consultations, town board meeting and open houses.
31	6.2	Office Hours	The Applicant indicated that it will have regular hours Tuesday and Thursday and that hours will be adjusted to match community interest. Staff recommends that the Applicant define "regular hours" so it is clear when your representatives will be available to the public.	Yes	The PIP has been revised to indicate the current "regular hours" are Tuesdays and Thursdays from 11:00 am to 1:00 pm.
32	6.3	Website	The Applicant indicates that it's in the process of establishing a user friendly website. Staff recommends that the PIP Plan reflect an estimated timeframe when the website will be fully functional.	Yes	The website was launched during the week that the proposed Public Involvement Program Plan was submitted. Section 6.3 is revised to identify the site address, <a href="http://www.BullRunWind.com">www.BullRunWind.com</a> .
33	6.3	Mailing Address on	The Applicant contact information should include a physical mailing address	Yes	The mailing address for the local office has been added to the PIP

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		Website	as well as an email address.		and the website.
34	6.3	Stakeholder instructions on Website	The contact information should include instructions and/or a link for becoming part of the project contact mailing list.	Yes	The website has been updated to include instructions on how to join the stakeholder list. The PIP has been updated to reflect this will be on the website.
35	6.3	Document Repositories	The Applicant indicates the project website will inform the public of the address of the local repositories. Staff recommends that the repositories address and location be included in the PIP Plan. Given that the office is in the Town of Ellenburg, the Applicant should consider additional document repository locations in other portions of the project study area.	Yes	In addition to at its local office, BRE will maintain key documents at local libraries and the Clinton town hall, since BRE is not aware of a public library in the Town of Clinton. The website and the PIP have been updated to indicate this.
36	6.3	Publications on Website	The Applicant should ensure that all publications and/or educational materials mailed to Stakeholder are also available on the website.	Yes	The PIP has been updated to reflect these materials will be available on the website.
37	[6.3]	Public Outreach and Project Schedule	The Applicant should provide key milestone dates/timeline for the project, as well as a schedule for public outreach events. The outreach information should describe the purpose/goal of outreach and identify activities that are planned to encourage participation.	Yes	BRE assumes this is a general comment on the PIP and not the section describing the project website.  The PIP now includes a table with project milestones, a schedule for public outreach activities and the goals of the outreach activities.
38	6.3	PIP Tracking Report on Website	The website should include copies of the project tracking report as described in Staff comments regarding Section 6.9 PIP Documentation.	Yes	The PIP has been updated to indicate the PIP tracking report(s) will be posted on the website.
39	6.4	Comment Log	The Applicant notes that it will "solicit and document" stakeholder concerns but does not indicate how this documentation will be accomplished. This statement should reference section 6.9 PIP Documentation.	Yes	Comments and concerns to be addressed during the pre-application and application review stages will be tracked by BRE in a comment list that it will maintain. The PIP has been updated to reflect this.
40	6.4	Typo	The tentative schedule for consultations is Appendix B, not A as noted.	Yes	
41	6.5	Town Board Presentation Dates	Although the schedule for these meetings is noted in Appendix B, the Applicant should provide the tentative schedule here.	Yes	
42	6.3	Town Board Presentation Documentation	Again, the dates of the meetings, a list of topics discussed, a summary of the comments received and the actions taken by the Applicant should be captured in the tracking document described in Section 6.9.	Yes	
43	6.6	Open House Schedule	The Applicant states it intends to hold an Open House; however, a location has not been selected yet. Although a location is not yet determined, the PIP Plan should also provide the following information: Identification of the times when the events will occur (weekday, weekend, afternoon, or evening).	Yes	
44	6.6	Open House Advertising	[Applicant should] provide the names of the newspapers it plans on advertising the dates and locations of its public open house.	Yes	
45	6.6	Multiple Open Houses	Staff recommends that the Applicant consider holding more than one Open House to accommodate schedules of municipal officials, residents and nonresidents who may not be able to attend the single Open House identified by the PIP Plan.	Yes	At this time, BRE is planning one Open House in addition to the consultations listed in Appendix B. BRE's mailing to stakeholders on the open house will request stakeholders contact BRE if they are unable to attend and like to schedule a one-on-one meeting, a call, or another open house.

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46	6.6	Open House Notices	The notice announcing the Open House date(s) must be provided to all Stakeholders, not just residents within the Study Area.	Yes	BRE will also advertise the open house by mailings to stakeholders.
47	6.7	Newspapers	Staff recommends that the Applicant provide notice in newspapers of record for host and adjacent municipalities, as well as newspapers of general circulation in the area.	Yes	The original PIP included the newspaper of record and the one other paper of general circulation in the area. The PIP has been updated to add <i>The Malone Telegram</i> , the newspaper of record for the adjacent community Town of Chateaugay.
48	6.7	PSC Acronym	The Applicant should spell out the acronym "PSC" the first time it is used.	Yes	Recommended change made in Section 2.1.
49	6.8	PIP Duration	As noted above, the PIP Plan should extend through the length of the Article 10 process - including the phases that occur after the submittal of the Preliminary Scoping Statement.	Yes	
50	6.9	PIP Tracking Report Update Schedule	The Applicant states it will maintain a log of activities. Staff recommends the Applicant develop a monthly or bi-monthly spreadsheet style tracking report that identifies PIP Plan activities conducted by the Applicant for the preceding time period, providing summaries of feedback received in such activities and summaries describing any actions taken by the Applicant in response to such feedback. The report should be written in a manner that makes it easy to track the Applicant's progress towards achieving its public involvement goals. The reports should be posted on its website and filed with the Secretary to the Commission for posting in the case file.	Yes	The PIP has been revised clarify that a project tracking report will be issued bi-monthly on the website and filed with the Secretary to the Commission.
51	6.9	PIP Tracking Report	The PIP Plan should include a tracking log identifying activities that have been performed to date.	Yes	The current tracking report has been added as an appendix to the PIP.
52	Fig 2	Road Names on Map	The map should have local road names added, particularly for roads that define boundaries of the Project Area.	Yes	The revised PIP contains a third figure showing local road names in the Project Area.
53	App. A	Affected Agency Note	The Table should include a footnote identifying what is meant by "Affected Agency."	Yes	
54	App. A	Conservation Category	There is no "Conservation" category in section 3.1. The Applicant should rename this category as "Public Interest Group" or create a new category.	Yes	Stakeholders previously categorized as "Conservation" are now in the "Public Interest Group" category.
55	App. A	State Legislature Names	The State Senate and Assembly representatives should be identified - not just the district.	Yes	
56	App. A	Stakeholder Addresses	The table should also include the contact information for the identified Stakeholder.	Yes	
57	App. A	Additional Stakeholders	Staff recommends that the Stakeholder list be updated to include the following: <ul style="list-style-type: none"> <li>a. NYS Division of Homeland Security &amp; Emergency Services</li> <li>b. NYS Department of State</li> <li>c. Clinton County District 2 Legislator(s) representing the areas for the proposed wind farm project</li> <li>d. Document repositories</li> </ul>	Yes	The document repositories are all halls for town boards that are already listed as stakeholders. Therefore, there is no need to add these to the stakeholder list. Other recommended stakeholders have been added to the list.

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58	App. A	Highway Departments and Fire Departments in the Study Area	The Applicant should include any additional highway and fire departments and emergency responders in the Study Area that were not previously identified.	Yes	The highway departments for Franklin County and the Town of Chateaugay have been added as stakeholders. There are no other emergency responders or highway departments covering the Study Area that were not included in the original stakeholder list.
59	App. A	Noble	While Marble River LLC, owner of the Marble River Wind Farm is identified as a potential stakeholder, other adjacent wind farm owners in the Study Area should be identified as well. Noble Environmental Power facilities in Clinton, Ellenburg and Altona are located in close proximity to the Bull Run Project Area.	Yes	Noble Environmental Power is added as a potential stakeholder
60	App. A	EDPR Jericho Rise	Also, EDPR is in early development of the Jericho Rise wind energy project in areas adjoining the proposed Bull Run Study Area. There is a potential need for additional cumulative impacts from these two projects to be assessed in environmental analysis in siting processes. The host municipalities for the Jericho Rise project should be included in Stakeholder list and Consultation Schedule. Please add Franklin County, Town of Belmont and Town of Chateaugay (and the applicable representatives).	Yes	Franklin County and the towns of Chateaugay and Belmont have been added as stakeholders.
61	App. B	Schedule for New Stakeholders	As noted above, the stakeholder consultation schedule should be updated to reflect the additional stakeholders as per Staff recommendations.	Yes	The revised PIP includes an updated Appendix with stakeholder consultation schedules, including new stakeholders added in the updated PIP.

<sup>i</sup> PIP section numbers are from the original revision of the PIP. Content in the August 2015 version may be located in different section numbers.