

State of New York
Public Service Commission
Case 25-T-0184

Application of Niagara Mohawk Power Corporation
d/b/a National Grid for a Certificate of
Environmental Compatibility and Public Need for
the reconstruction of approximately 60.9 miles of
115kV Transmission Line Running from the Black
River Substation in the Town of LeRay, Jefferson
County, to the Clay Substation, in the Town of Clay,
Onondaga County, and the Construction of the New
Staplin Creek Substation in the Town of Rutland,
Jefferson County.

Niagara Mohawk Power Corporation

d/b/a

The logo for National Grid, featuring the word "national" in a blue sans-serif font and "grid" in a bold, blue sans-serif font.

Environmental Management and Construction Plan
for the
Black River - Clay 115 kV Transmission
Rebuild Project
(Part 2)

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I. GENERAL DESCRIPTION OF THE PROJECT

A. INTRODUCTION

On March 14, 2025, National Grid (“National Grid” or “Applicant”) filed with the New York State Public Service Commission (“Commission”) application documents, pursuant to Article VII of the Public Service Law (“PSL”) and the Commission’s regulations thereunder, for a Certificate of Environmental Compatibility and Public Need (“Certificate”) authorizing the reconstruction of approximately 60.9 miles of the 115 kilovolt (“kV”) transmission line running between the Black River Substation in the Town of LeRay, Jefferson County and the Clay Substation in the Town of Clay, Onondaga County (hereinafter referred to as the “Black River to Clay Transmission Rebuild” or the “Project”). This Project begins at existing Structure 6.5 approximately 0.7 mile south of the Black River Substation and traverses the Towns of LeRay, Rutland, Rodman, Worth, and Lorraine in Jefferson County; the Towns of Boylston, Orwell, Albion, Parish, and Hastings and the Village of Central Square in Oswego County; and the Towns of Cicero and Clay in Onondaga County.

On May 27, 2026, the Applicant filed a Joint Proposal (“Joint Proposal”) reflecting the terms of settlement of outstanding issues in this proceeding by the Applicant and other settling parties. On July 17, 2026, the Commission issued the Certificate in an *Order Adopting the Terms of a Joint Proposal, With Conditions* and in doing so granted the Applicant a Certificate of Environmental Compatibility and Public Need (“Order” or “Certificate”) in this proceeding.

This Environmental Management & Construction Plan (“EM&CP”) is being submitted by the Applicant in compliance with the Order, including the Specifications contained in Appendix E to the Joint Proposal, and is intended to describe the environmental protection measures to be implemented during construction of the Project.

This EM&CP provides a general description of the Project (Section I), lists each Certificate Condition as set forth in Appendix D of the Joint Proposal with a National Grid Response (Section II), and responds to and complies with the Specifications for the Development of Environmental Management and Construction Plan as put forth in Appendix E of the Joint Proposal (Section III).

Upon Commission approval of this EM&CP, the Applicant will construct the Project in full Compliance with the Order and this EM&CP document.

B. PROJECT LOCATION

As noted above, the Project is the reconstruction of approximately 60.9 miles of the 115 kilovolt (“kV”) transmission line running between the Black River Substation in the Town of LeRay, Jefferson County and the Clay Substation in the Town of Clay, Onondaga County (hereinafter referred to as the “Black River to Clay Transmission Rebuild Project” or the “Project”). This Project begins at existing Structure 6.5 approximately 0.7 mile south

of the Black River Substation and traverses the Towns of LeRay, Rutland, Rodman, Worth, and Lorraine in Jefferson County; the Towns of Boylston, Orwell¹, Albion, Parish, and Hastings and the Village of Central Square in Oswego County; and the Towns of Cicero and Clay in Onondaga County. The Project will also include the construction and operation of the new Staplin Creek Substation and associated tap lines within the Town of Rutland, Jefferson County. The location of the Project is detailed in Exhibit 2 and Exhibit E-2 of the Application (Exhibit 2 and Exhibit 11 of the Evidentiary Record) and Appendix B to the Joint Proposal.

The Project is viewed as two (2) sections: the double circuit Black River –Lighthouse Hill (“LHH”) section (35.9 miles) and the bussed LHH – Clay section (25 miles). Within the Black River – LHH, three (3) lines will be rebuilt: (i) Coffeen-Black River – LHH #5; (ii) Black River – Middle Road #8; and (iii) Middle Road – LHH #6. Within the LHH-Clay section, the LHH – Clay #7 Line will be rebuilt.² Both sections will be rebuilt as two (2) single circuit facilities.

The Black River – Middle Road #8 and Middle Road – LHH #6 Lines share the same double circuit steel towers as the Coffeen - Black River – LHH #5 Line. The Black River – Middle Road #8 Line loops into the Middle Road Substation; this loop is known as the Middle Road – LHH #6 Line. Outside of Black River Substation, the Project is proposed to begin at existing Structure 6.5. The line segment from the Black River Substation to Structure 6.5 is being completed as part of another CLCPA project and will be covered as part of that application.³

National Grid currently maintains a ROW made up of a combination of fee-owned property and easements. To accommodate the new structure configuration, National Grid is working to obtain easements which will result in a ROW between 100 and 150 feet.

C. SPECIFIC PROJECT COMPONENTS

Transmission Line Segments

The Black River – Clay 115 kV Transmission Rebuild Project consists of eight (8) distinct segments, which will replace the existing double circuit and bussed steel towers with new single circuit single pole galvanized steel structures with the ability to carry one or two shieldwires. There are sections of the lines where the double circuit towers have been replaced more recently with newer square base towers or two (2) wood pole suspension structures. Where it is found that appropriate clearances are met and structures are shown to be structurally adequate for the proposed conductors and shieldwires, and where the configuration will meet Electric and Magnetic Field Guidelines, the structures may remain in place.

¹ The only aspect of the Project in Orwell is that structures will be removed.

² The line names will change once the EM&CP is approved.

³ See Case 25-T-0195, Black River to Beaver River Project.

The Applicant proposes to rebuild the Existing Black River – LHH and LHH – Clay Lines, which primarily feature 4/0 AWG Copper conductor. The existing conductor will be replaced with double bundled 636 kcmil 26/7 ACSS “Grosbeak” HS 285 Ultra High Strength subconductors per phase. Existing shieldwire will be replaced with one ½” 48 fiber DNO-13120 all Corning glass OPGW on each line. In select areas, a second shieldwire of 19#9 alumoweld will be installed based on the need for additional protection.

Segment 1 – Black River – Staplin Creek & Staplin Creek – LHH – Mile marker 0.00 to 14.26 (14.26 miles)

In Segment 1, the existing double circuit lines are proposed to be rebuilt as two single circuit lines. The proposed Coffeen – Black River – Staplin Creek #5 Lines will be rebuilt on the existing centerline. The proposed Black River – Middle Road #8 and Middle Road – LHH #6 Lines will be rebuilt 50’ to the east. Segment 1 will require the removal of 138 existing structures. Further, in this segment, approximately 67 engineered steel pole structures on foundations for angles and deadends, and approximately 201 direct embed steel LD suspension structures will be installed. Typical structure configurations for tangent and deadend structures will be single circuit galvanized tubular steel single pole structures with davit arms.

Segment 2 – Staplin Creek – LHH – Mile Marker 14.26 to 14.95 (0.69 miles)

In Segment 2, the proposed 0.69-mile section of the double circuit Coffeen – Black River – LHH #5 and Middle Road – Lighthouse Hill #6 will be rebuilt on the existing centerline as one double circuit line. Segment 2 will require the removal of 7 existing structures. Further, in this segment, 7 engineered steel pole structures on foundations for tangent, angle, and deadend structures will be installed. Typical structure configurations will be double circuit galvanized tubular steel single pole structures with davit arms. This segment of the line is proposed to be double circuit to maintain a 100’ ROW corridor in this area.

Segment 3 – Staplin Creek – LHH – mile marker 14.95 to 34.75 (19.8 miles)

In Segment 3, the proposed 19.8-mile section of the double circuit Coffeen – Black River – LHH #5 and Middle Road - LHH #6 Lines will be rebuilt as two single circuit lines. The proposed Coffeen – Black River – LHH #5 Line will be rebuilt on the existing centerline, and the proposed Middle Road – LHH #6 Line will be offset 50’ to the east. Segment 3 will require the removal of 189 existing structures. Further, in this segment, 62 engineered steel pole structures on foundations for angle and deadend structures, and 318 direct embed steel LD suspension structures will be installed. Typical structure configurations for tangent and deadend structures will be single circuit galvanized tubular steel single pole structures with davit arms.

Segment 4 – Staplin Creek – LHH – mile marker 34.75 to 35.99 (1.24 miles)

In Segment 4, the proposed 1.24-mile section of the double circuit Lighthouse Hill – Clay #7 Line will be rebuilt as two single circuit lines. The LHH Substation will be bypassed as part of this segment. Lines #5 and #6 will be routed to a new locally permitted Tar Hill Substation, approximately 1 mile west of the current substation. The Staplin Creek – Tar Hill #5 Line will be rebuilt approximately 125' to the north, and the proposed Staplin Creek – Tar Hill #6 Line will be rebuilt approximately 75' to the north. Segment 4 will require the removal of 14 existing structures. Further, in this segment, 8 engineered steel pole structures on foundations for angle, deadend, and switch structures and 16 direct embed steel LD suspension structures will be installed. Typical structure configurations for tangent and deadend structures will be single circuit galvanized tubular steel single pole structures with davit arms.

Segment 5 – LHH – Clay – mile marker 35.99 to 50.48 (14.59 miles)

In Segment 5, the proposed 14.59-mile section of the double circuit LHH – Clay #7 Line will be rebuilt as two single circuit lines. The LHH – Clay #7 Line will be rebuilt on the existing centerline and the bussed LHH – Clay #7 Line will be rebuilt 50' to the east throughout the segment. Segment 5 will require the removal of 158 existing structures. Further, in this segment, 75 engineered steel pole structures on foundations for angle, deadend, and switch structures and 221 direct embed steel LD suspension structures will be installed. Typical structure configurations for tangent and deadend structures will be single circuit galvanized tubular steel single pole structures with davit arms.

Segment 6 – LHH – Clay – Mile marker 50.58 to 55.18 (4.6 miles)

In Segment 6, the existing 4.6-mile section of the double circuit LHH – Clay #7 Line and bussed LHH – Clay #7 Line will be rebuilt as a combination of two single circuit lines and one double circuit line. From Structure 151 to 154, the LHH – Clay #7 Line will be rebuilt on the existing centerline and the bussed LHH – Clay #7 Line will be offset 50' to the west. From Structure 190 to 194, the LHH – Clay #7 and bussed LHH – Clay #7 Lines will transition from single circuit to double circuit, then back to single circuit again. Single circuit davit arm deadend structures will be installed at Structures 190 and 194. Single circuit vertical suspension structures will be installed at Structures 191 and 193. A double circuit davit arm deadend structure will be installed at Structure 192. From Structure 190 to 194, the LHH – Clay #7 Line will be installed approximately 10' to 15' east of the existing circuit, and the bussed LHH – Clay #7 Line will be rebuilt approximately 35' to 40' to the west of the existing circuit. At Structure 216.5, the LHH – Clay #7 Line loops into and out of the Mallory Substation. From Structure 217 to Structure 218, the LHH – Clay #7 and bussed LHH – Clay #7 Lines will be installed on double circuit davit arm structures on the existing centerline. From Structure 219 to Structure 229, the bussed LHH – Clay #7 Line will be rebuilt on the existing centerline, and the LHH – Clay #7 Line will be rebuilt 50' to the west with single circuit davit arm structures. Structures 230 and 231 will utilize double circuit davit arm structures, with the LHH – Clay #7 and bussed LHH – Clay #7 Lines

rebuilt on the existing centerline. Structures 232 to 237 will be single circuit structures for both LHH – Clay #7 and bussed LHH – Clay #7.

A CSX railroad parallels Segment 6 on the eastern side of the ROW. Segment 6 will require the removal of fifty-eight (58) existing structures. Fifty (50) engineered steel pole structures on foundations for angle and deadend structures, and fifty-six (56) direct embed steel LD suspension structures will be installed. Typical structure configurations for tangent and deadend structures will be single circuit galvanized tubular steel single pole structures with davit arms.

Segment 7 – LHH – Clay – Mile marker 55.18 to 58.33 (3.15 miles)

In Segment 7, the proposed 3.15-mile section of the double circuit LHH – Clay Line will be rebuilt as one double circuit line and one single circuit line. There is one span, noted below, where two double circuit lines will be installed. This segment includes the existing LHH – Clay #7, bussed LHH – Clay #7, South Oswego – Clay #4, and Bennetts Bridge – Geres Lock #6 Lines. From Structure 246 to Structure 267, the #4 and #7 Lines will be rebuilt on engineered steel double circuit davit arm structures. The bussed #7 Line will be installed on single circuit structures from Structure 246 to Structure 267, except from Structure 271 to Structure 272. At these two structures, the #6 Line will be double circuited with the bussed #7 Line for this single span. The #6 Line will be removed from all other parts of the ROW. Segment 7 will require the removal of 67 existing structures. Further, in this segment, 48 engineered steel pole structures on foundations for double circuit, angle deadends, and 20 direct embed LD steel single circuit suspension structures will be installed. Typical structure configurations for tangent and deadend structures will be galvanized tubular steel single pole structures with davit arms.

Segment 8 - LHH - Clay - Mile marker 58.33 to 60.92 (2.59 miles)

In Segment 8, the proposed 2.59-mile section of the double circuit LHH – Clay Line will be rebuilt as two single circuit lines. This segment includes the existing LHH – Clay #7 Line, and the bussed LHH – Clay – #7 Line. The existing bussed LHH – Clay #7 Line will be rebuilt 65' west of the existing centerline, and the LHH – Clay #7 Line will be rebuilt 115' west of the existing centerline. Segment 8 will require the removal of 27 existing structures. Further in this segment, 21 engineered steel pole structures on foundations for angle, deadend, and switch structures and 30 direct embed steel LD suspension structures will be installed. Typical structure configurations for tangent and deadend structures will be single circuit galvanized tubular steel single pole structures with davit arms. H-frame and three pole deadend structures will be used outside Clay substation to pass under existing transmission lines.

National Grid Pipelines

National Grid proposes to install AC Mitigation for gas pipelines as shown in Appendix A to protect them from changes associated with the installation of electric transmission infrastructure. The mitigation protection will consist of the installation of underground

copper ribbon, solid state decoupler devices (SSD), and coupon test stations. Details and specifications for the equipment and the installation as well as general location of the proposed facilities will be provided once finalized. In general, copper ribbon will be plowed into place with a tracked trencher to a minimum depth of 3-feet and a horizontal distance that can vary from 1-25 feet from the pipeline. In ag lands ribbon will be buried to a depth of 4 feet unless prohibited by bedrock. SSDs will be supported by and attached to the inside of an above ground fiberglass pedestal. The pedestal will be embedded 8-12 inches below grade. Each location will require a work area approximately 10 feet x 10 feet within which excavation to the pipeline will occur for installation. Coupon test stations will be installed immediately above the pipeline when allowed and will extend above grade. Installation of the Coupon Test Stations will generally be similar to the installation of the SSDs described above. Vacuum excavation or hand digging will be the primary means of exposing the pipelines. The equipment to be utilized predominantly will be low ground pressure to minimize soil disturbance.

Substation Facilities

The Black River – Clay 115 kV Transmission Rebuild Project requires the construction of the Staplin Creek Substation and the demolition of the Middle Road Substation in the Town of Rutland, Jefferson County, New York. The EM&CP for the Staplin Creek Substation was filed with the Commission on May 27, 2026 and National Grid has responded to minor comments from DPS Staff and the Department of Environmental Conservation.

Middle Road Substation

The existing Middle Road Substation will be demolished and used as a parking area after construction of the proposed Staplin Creek Substation is complete.

Babbits Corner Tap & Switch Structures

At existing transmission Structure 121, the Middle Road – LHH #6 Line currently taps to the Babbits Corner Substation in the Town of Rodman, New York (See Figure E-2-4). The tap currently exists as a wood double circuit two-pole structure. The tap will be rebuilt with single circuit tubular steel deadend structures, self-supported by reinforced concrete caisson foundations. Vertical switches will be installed on either side of the tap structure. New conductor type will be 795 kcmil ACSR 26/7 “Drake”, and the new shieldwire will be 0.661” inch 96 fiber optical ground wire . This tap rebuild will help to accommodate system operations and outage sequence planning. In total six (6) structures will be installed at the Babbits Corner tap.⁴

⁴ The work needed for Babbits Corner tap is independent of the need for this Project and may be performed separate from this Article VII process, even if that means state permits may be required.

D. ADDITIONAL PROPERTY RIGHTS

National Grid owns a combination of fee and easement rights over the length of the Project. As detailed in Exhibit 2 and Exhibit 4 of the Application (Exhibit 2 and Exhibit 4 of the Joint Proposal) and Appendix B to the Joint Proposal, the Applicant will need to acquire additional ROW in the form of Operational (Gross) Easements that allow, among other rights, the construction, operation, repair and maintenance of electric transmission line structures and related facilities. National Grid will also obtain any necessary danger tree easements. National Grid will also obtain any necessary Railroad License Agreements, which will allow Nation Grid to install, occupy, operate, access, and maintain the Project facilities upon railroad property.

Currently National Grid owns a combination of fee and easement rights over the length of the Project. To accommodate the new structure configuration within the Proposed ROW, National Grid is working to obtain additional easements. Additional information regarding supplemental property rights is included in Table 4.2-1 of the Application. There are several areas that have been identified that may require additional operational easements and are shown in Table 4.2-1 and on Figure 2-5 of the Application. Further details are provided in this EM&CP.

National Grid also proposed the use of three (3) properties, the Coffin I Marshalling Yard, the Coffin II Marshalling Yard, and Bert Howard Marshalling Yard, as marshalling and laydown yards for the Project. See Appendix A of the Joint Proposal and Record Exhibit 35.

E. PROJECT SCHEDULE

Upon receipt of all required permits, approvals, and easements or other land rights, and following completion of all required notifications and receipt of a "Notice to Proceed with Construction," National Grid will be prepared to start work on the Project. A preconstruction meeting will be held at least two (2) weeks prior to the start of construction to review the EM&CP and Certificate Ordering Clauses, National Grid's health and safety requirements and the Project schedule.

Construction of the Project will generally involve the following activities and proceed in the order identified below:

1. Survey stakeout;
2. Installation of Stormwater Pollution and Prevention Plan (SWPPP) erosion and sediment controls and traffic signage;
3. ROW Clearing / Vegetation Management;
4. Site grading and installation of access roads and work pads;
5. Culvert installations and drainage improvements;
6. Foundation installation;
7. Structure installation;
8. Wire stringing;

9. Structure removal; and
10. Clean-up and restoration, including any plantings.

A detailed construction schedule will not be finalized until contracts have been awarded to all contractors. It is anticipated that construction will take approximately 34 months. A tentative Project schedule follows in Table E-1.

Table E-1: Project Schedule

Activity	Start Date	Finish Date
EM&CP Approval	November 2026	November 2026
Marshalling yard improvement / Materials management	September 2026	June 2028
Material delivery	January 2027	June 2028
Construction Contract Award	January 2026	January 2026
Surveying and Stakeout	September 2026	February 2027
Installation of erosion and sediment control measures	February 2027	April 2029
ROW clearing / Vegetation management	January 2027	April 2028
Mobilization	January 2027	February 2027
Site grading and installation of access roads and work pads	February 2027	December 2028
T-Line Construction Start	March 2027	March 2027
Structure installation	March 2027	November 2029
Wire stringing	April 2027	January 2030
Structure removal	April 2027	December 2029
In-Service		December 2029
Clean-up and final restoration	March 2028	May 2030

II. CERTIFICATE CONDITIONS AND NATIONAL GRID RESPONSES

The Certificate of Environmental Compatibility and Public Need (the “Certificate”) for Case 25-T-0184 granted to Niagara Mohawk Power Corporation d/b/a National Grid (“National Grid” or the “Certificate Holder”), by the New York State Public Service Commission (the “Commission”), pursuant to Article VII of the New York State Public Service Law (“PSL”), authorizing the rebuild of the 115 kilovolt (“kV”) transmission lines between the new Black River Substation in the Town of LeRay, Jefferson County, and the Clay Substation in the Town of Clay, Onondaga County. The Project will also include the construction of the proposed Staplin Creek Substation and associated tap lines in the Town of Rutland, Jefferson County and the demolition of the existing Middle Road Substation. The Project

begins at Existing structure 6.5 approximately 0.7 mile south of the Black River Substation and traverses the Towns of LeRay, Rutland, Rodman, Worth, and Lorraine in Jefferson County; the Towns of Boylston, Orwell, Albion, Parish, and Hastings, and the Village of Central Square in Oswego County; and the Towns of Cicero and Clay in Onondaga County. The Project is subject to the following conditions:

A. CONDITIONS OF THE ORDER

CONDITION 1. The Certificate Holder shall, within 30 days after the issuance of the Certificate, file with the Secretary to the Commission (the “Secretary”) either a petition for rehearing or a verified statement that it accepts and will comply with the Certificate. Failure to comply with this Condition shall invalidate the Certificate.

NG Response 1: *A verified statement will be filed with the Commission within thirty (30) days of the issuance of the Certificate stating that National Grid accepts and shall comply with the Certificate.*

CONDITION 2. If the Certificate Holder decides not to commence construction of any portion of the Facility, it shall so notify the Secretary in writing within 30 days of making such decision and shall serve a copy of such notice upon all parties in the same manner and at the same time as it files with the Secretary.

NG Response 2: *National Grid will comply.*

CONDITION 3. The Certificate Holder shall construct the Project in accordance with this Certificate and the approved Environmental Management and Construction Plan (“EM&CP”) and any subsequent Commission orders.

NG Response 3: *National Grid will comply.*

CONDITION 4. If construction of the Project hereby certified is not commenced within 18 months after the Certificate Holder files a verified statement that it accepts and will comply with the Certificate, the Certificate may be vacated with notice to the Certificate Holder.

NG Response 4: *National Grid acknowledges this Certificate Condition.*

CONDITION 5. Except for deadlines established by the statute, the Secretary may extend any deadlines established by this order for good cause shown.

NG Response 5: *National Grid acknowledges this Certificate Condition.*

B. DESCRIPTION AND LOCATION OF FACILITIES

CONDITION 6. Appendix B of the Joint Proposal, entitled “Description and Location of Project,” identifies the Project description, its proposed location, and the components of

the Project. The Project is intended to rebuild approximately 60.9 miles of the 115 kV transmission lines between the new Black River Substation in the Town of LeRay, Jefferson County, and the Clay Substation in the Town of Clay, Onondaga County. The Project will also include the construction of the proposed Staplin Creek Substation and associated tap lines in the Town of Rutland, Jefferson County, and the demolition of the existing Middle Road Substation. The Project begins at Existing structure 6.5 approximately 0.7 mile south of the Black River Substation and traverses the Towns of LeRay, Rutland, Rodman, Worth, and Lorraine in Jefferson County; the Towns of Boylston, Orwell, Albion, Parish, and Hastings, and the Village of Central Square in Oswego County; and the Towns of Cicero and Clay in Onondaga County.

NG Response 6: *National Grid acknowledges this Certificate Condition.*

C. LAWS AND REGULATIONS

CONDITION 7. Notwithstanding any contrary provisions of the Certificate, each substantive federal, state, and local law, regulation, code, and ordinance applicable to the Project shall apply, except to the extent that the Commission has expressly declined to apply any substantive local law or regulation as being unreasonably restrictive.

NG Response 7: *National Grid will comply.*

CONDITION 8. No state or local law, local regulation, local code, or local ordinance purporting to require any approval, consent, permit, certificate, or other condition for the construction or operation of the Project authorized by the Certificate shall apply, except for:

- a) Those of the PSL and regulations and orders adopted thereunder;
- b) Those provided by otherwise applicable state law for the protection of employees engaged in the construction and operation of the Project;
- c) Those permits issued under a federally delegated or approved environmental permitting program.

NG Response 8: *National Grid will comply.*

CONDITION 9. The Certificate Holder shall construct the Project in accordance with the then-current Building Code of New York State, all applicable standards of the American National Standards Institute ("ANSI") and the National Fire Protection Association ("NFPA"), the National Electrical Safety Code ("NESC"), the Association of Edison Illuminating Companies ("AEIC"), and any stricter standards adopted by the Certificate Holder.

NG Response 9: *National Grid will comply.*

CONDITION 10. The Certificate Holder shall coordinate all work performed on State and municipal roads and highways with the appropriate State and municipal officials, including public emergency response organizations, such as local fire departments and police departments having jurisdiction over the area where such work is being actively performed (collectively “Emergency Services”), shall provide information regarding the planned activities and scope of work, and shall obtain the required authorization for such work, subject to the Commission’s continuing jurisdiction as appropriate. A copy of each such authorization shall be provided to the Secretary by the Certificate Holder before commencement of construction across the affected municipal road or highway.

NG Response 10: National Grid will comply.

CONDITION 11. The Certificate Holder shall coordinate with the appropriate municipal agencies, including Emergency Services for traffic management of roads under their respective jurisdictions.

NG Response 11: National Grid will comply. National Grid will coordinate all work activities within highway boundaries with the appropriate state and municipal agencies and police departments.

CONDITION 12. The Certificate Holder shall obtain any necessary Highway Work Permits, Utility Work Permits (“UWP”), and Use and Occupancy Permits (“U&O Permits”) from the New York State Department of Transportation (“NYSDOT”) for Project-related construction and work within the NYSDOT Highway Right-of-Way as specified in the Project’s EM&CP. The Certificate Holder must obtain any such UWP, U&O Permits, and Highway Work Permits prior to commencing pre-construction or construction activities within the NYSDOT Highway Right-of-Way. Other provisions of this Certificate notwithstanding, the Certificate Holder shall design and construct the portions of the Project within the NYSDOT Highway ROW in accordance with such permits and all applicable statutes and regulations.

NG Response 12: National Grid will comply. National Grid will obtain any necessary Utility Work Permits and Use and Occupancy Permits from NYSDOT, Onondaga County Highway Department, Oswego County Highway Department, Jefferson County Highway Department. All Town Highway Departments within the Project have indicated that they will not require Highway Work Permits, Utility Work Permits (“UWP”), and Use and Occupancy Permits (“U&O Permits”) for Town Roads. The only Municipal roads along the Project route are in the Village of Central Square. The Village of Central Square does not require Highway Work Permits, Utility Work Permits (“UWP”), and Use and Occupancy Permits (“U&O Permits”) for Village Streets. Copies of such permits and approvals are provided in Appendix J or will otherwise be filed with the Secretary once received.

CONDITION 13. A copy of each permit or approval received by the Certificate Holder for this Project from the issuing agencies, including all necessary U.S. Army Corps of Engineers (“USACE”) permits for construction in federal wetlands affected by the Project

pursuant to Section 404 of the Federal Clean Water Act, the State Pollutant Discharge Elimination System ("SPDES") General Permit for Stormwater Discharges from Construction Activities (Permit No. GP-0-25-001 or the then-effective general permit number) ("SPDES General Permit"), the NYSDEC Letter of Authorization for the SPDES General Permit, and NYSDOT Highway or U&O permits shall be provided to the Secretary by the Certificate Holder before commencement of any Project construction that requires such permit or approval.

NG Response 13: *National Grid will comply. Correspondence and copies of federal permits and approvals issued by the USACE and other such environmental agencies are provided in Appendix H or will otherwise be filed with the Secretary once received after the EM&CP is approved.*

CONDITION 14. The Certificate Holder's maintenance of the Project Right of Way ("ROW") will be in accordance with the Certificate Holder's Commission-approved Transmission Right-of-Way Management Plan ("TROWMP") pursuant to 16 NYCRR Part 84, as amended from time to time. The currently effective TROWMP is on file with the Commission in Case 10-E-0155.

NG Response 14: *National Grid will comply.*

CONDITION 15. If, after attempting to resolve any issues with the appropriate State or municipal agency, the Certificate Holder believes that any action taken, or determination made, by a State or municipal agency in connection with this Certificate is unreasonable or unreasonably delayed, it may petition the Commission, upon reasonable notice to that agency, to seek a resolution of any such unreasonable or unreasonably delayed determination. Such agency may respond to the petition within five (5) days to address the reasonableness and requirement of the delayed.

NG Response 15: *National Grid acknowledges this Certificate Condition.*

D. PUBLIC HEALTH AND SAFETY

CONDITION 16. The Certificate Holder shall design, engineer, and construct the Project such that its operation shall comply with the electric and magnetic field standard established by the Commission in Opinion No. 78-13, issued June 19, 1978, and the Statement of Interim Policy on Magnetic Fields of Major Electric Transmission Facilities, issued September 11, 1990.

NG Response 16: *National Grid will comply.*

CONDITION 17. The Certificate Holder shall keep local fire department and emergency management teams apprised of on-site hazardous chemicals and waste. All such chemicals and waste shall be secured in a locked and controlled area.

NG Response 17: *National Grid will comply. A list of typical chemicals and waste anticipated for the Project as well as National Grid's spill reporting and cleanup procedures are provided in Appendix V. A list of emergency contact personnel and local hospitals along with a map showing the location of the nearest hospitals are provided in Appendix K.*

CONDITION 18. The Certificate Holder shall take appropriate measures to minimize fugitive dust and airborne debris from construction activity. Exposed soils and roadways shall be wetted as needed during extended dry periods to minimize dust generation. To the extent practicable, water for dust control shall come from municipal water supplies or sources, but shall not be taken from fire hydrants without prior written consent from the local fire department. No dust control substances other than water will be allowed during Project construction without prior Department of Public Service ("DPS") Staff permission.

NG Response 18: *National Grid will comply.*

CONDITION 19. The Certificate Holder shall ensure that parking for the Project construction, including workers' personal vehicles shall be in designated areas where the parking of such vehicles does not interfere with normal traffic or cause a safety hazard and will minimize impacts to existing land uses to the extent practicable. These parking areas shall be designated in the EM&CP, and parking shall be limited to parking areas in the approved EM&CP.

NG Response 19: *National Grid will comply. Construction worker parking has been designated at the Project marshalling yards and substation yard. Drawings showing the location of the substation yard and parking improvements to be made within the proximity of the Project ROW are provided in Appendix A and are shown on the Staplin Creek Substation EM&CP, filed on May 27, 2026. Beyond what is described in Certificate Condition 33 and Appendix H of the Joint Proposal, it is not currently anticipated that any additional off-site marshaling yards are required. However, if the need arises, National Grid will work with DPS Staff to gain approval for the proposed site.*

CONDITION 20. The Certificate Holder or its supplier, as the case may be, shall obtain any permits from applicable agencies required for the delivery of oversized components for the Project.

NG Response 20: *National Grid will comply.*

CONDITION 21. The Certificate Holder shall have the right to require that any person, except for Emergency Services in their official duties, seeking to access the Project area, unescorted, first be appropriately trained in environmental protection and safety. This training shall be made available at the Project's preconstruction meeting. DPS Staff, New York State Department of Environmental Conservation ("NYSDEC") and NYS Department of Agriculture and Markets ("NYSAGM") staff who are present at the Project site are appropriately trained for the purposes of this Condition. New York State Department of Transportation ("NYSDOT") personnel present at the Project site(s)

located within the NYSDOT Highway Right-of-way are appropriately trained for the purposes of this Condition.

NG Response 21: *National Grid acknowledges this Certificate Condition. See also response to Condition 110.*

CONDITION 22. The Certificate Holder shall engineer and construct the Project to be compatible with the operation and maintenance of public utility infrastructure within Certificate Holder's ROW including, but not limited to, electric, gas and petroleum products, telecommunication, water, sewer, and related facilities. For each of the Project's crossings of or co-locations with third-party public utility infrastructure, the Certificate Holder shall demonstrate in the EM&CP that it has engineered the Project and will construct the Project to be compatible with such third-party infrastructure. Such demonstrations may include crossing agreements or letters of no objection. If the Certificate Holder demonstrates compatibility with crossing agreements or letters of no objection, copies shall be filed with the Secretary prior to commencement of construction activities within the affected area.

NG Response 22: *National Grid acknowledges this Certificate Condition and will file any necessary documentation as required under this Condition with the Secretary prior to commencing construction activities within the area of such co-located infrastructure .*

E. ENVIRONMENTAL MANAGEMENT AND CONSTRUCTION PLAN PROCESS

CONDITION 23. The EM&CP shall be developed in accordance with these Certificate Conditions and, except where this Certificate requires otherwise, environmental protection measures contained in the Application shall be incorporated into the EM&CP. Where there is a conflict between the Certificate Conditions and those environmental protection measures contained in the Application, these Certificate Conditions shall prevail. Applicable provisions of the Certificate, EM&CP, and Commission Order(s) approving the EM&CP shall be accommodated in any design or construction contracts associated with the Project. The EM&CP shall be prepared in accordance with the Specifications for the Development of Environmental Management and Construction Plan, attached as Appendix E to the Joint Proposal ("EM&CP Specifications").

NG Response 23: *National Grid will comply with the Specifications in Appendix E to the Joint Proposal. Further detail can be found in EM&CP Section III and the Appendices to this EM&CP.*

CONDITION 24. Prior to filing the EM&CP, the Certificate Holder shall contact NYSDEC and New York State Natural Heritage Program and the United States Fish and Wildlife Service ("USFWS") to check for any updates or changes of known protected plant or animal species applicable habitat or Significant Natural Communities in the Project area, including any known offsite areas to be utilized for construction, such as marshalling yards. Should the Certificate Holder learn of any relevant updates, it will inform DPS Staff of such updates by including them in the EM&CP.

NG Response 24: *National Grid has complied. Copies of pertinent agency correspondence are provided within Appendix H. Any subsequent updates will be provided to DPS Staff in a timely manner prior to construction of a given EM&CP Phase.*

CONDITION 25. The Certificate Holder shall provide as part of the EM&CP:

- a) A final design plan that conforms to the Project design set forth in the Certificate and to applicable Federal, State, and local requirements;
- b) A discussion of the status of the Certificate Holder's efforts to obtain permits necessary for construction of the Project from Federal agencies and State agencies with Federally delegated authority;
- c) The URL address for the Certificate Holder's website containing Project information; and
- d) The location of document repositories.

NG Response 25: *National Grid will comply.*

CONDITION 26. The Certificate Holder shall file an electronic copy of its proposed EM&CP with the Secretary and contemporaneously inform all parties to this proceeding of such filing and of the DPS website page(s) where the proposed EM&CP is available. Additionally, unless otherwise directed by the Secretary, the Certificate Holder shall serve one electronic copy on each of: the assigned Project Manager in the Bureau of Energy Project Management of NYSDEC Central Office in Albany; Natural Resources Supervisors of Regions 6 and 7 office of the NYSDEC; the staff of NYSAGM; the Regional Directors of Regions 3 and 7 offices of the NYSDOT; any other New York State agency that requests the document; and any party on the service list who requests the document. Within seven days after the Certificate Holder files the proposed EM&CP with the Secretary, it shall deliver two hard copies to DPS Staff. The Certificate Holder also shall place one electronic copy or one hard copy for inspection in a convenient location in each municipality in which construction will take place, which location for a given municipality may be a library or town hall in such municipality identified in the Service List for the Application. The Certificate Holder will also make the EM&CP accessible on its Project website by way of either direct PDF download(s) or a web link to the DPS website page(s) where the EM&CP is available.

NG Response 26: *National Grid will comply.*

CONDITION 27. Contemporaneously with filing and serving the proposed EM&CP, the Certificate Holder shall disseminate, in the manner specified below, a written notice, in language reasonably understandable to the average person, that the proposed EM&CP has been filed (the "EM&CP Filing Notice"):

- a) The Certificate Holder shall serve a copy of the EM&CP Filing Notice on all parties to this proceeding (except those upon whom the foregoing paragraph requires the Certificate Holder to serve a copy of the proposed EM&CP) and on all persons required to be served with the Application by statute or regulation.
- b) The Certificate Holder shall deliver by first class mail a copy of the EM&CP Filing Notice to the owners and residents (if different from the owners) of all properties that abut the Project route and all properties on which new property rights are required for the Project. The EM&CP Filing Notice delivered to the owner and residents (if different from the owner) of each property on which property rights are to be acquired shall include a description of the type of property rights to be acquired for that property.
- c) The Certificate Holder shall include a copy of the EM&CP Filing Notice in the EM&CP.
- d) The Certificate Holder shall publish a copy of the EM&CP Filing Notice in a newspaper or newspapers of general circulation near the proposed Project, including a free newspaper where available in the vicinity of the Project.

NG Response 27: *National Grid will comply. A copy of the typical written notice of National Grid's filing of the EM&CP with the Commission (the "EM&CP Filing Notice") is provided in Appendix I.*

CONDITION 28. The EM&CP Filing Notice shall contain, at a minimum, the following:

- a) A statement that the proposed Project EM&CP has been filed with the Secretary to the Commission in Case 25-T-0184;
- b) A general description of the certified Project, the need for the Project, and the contents of the proposed EM&CP;
- c) A listing of the locations and website URL where the Certificate Holder and DPS have made the proposed EM&CP available for public inspection, including a description of how to access the EM&CP on DMM;
- d) A statement that any person desiring additional information about a specific geographical location or specific subject may request it from the Certificate Holder;
- e) The name, address, and telephone numbers of an appropriate Certificate Holder representative;
- f) The postal address of the Secretary and the DPS website; and
- g) A statement that any person may be heard by the Commission on any matter or objection regarding the proposed EM&CP by filing written comments with the

Secretary and the Certificate Holder within 30 days of the date the proposed EM&CP was filed with the Commission, or within 30 days of the date of the newspaper publication of a copy of the EM&CP Filing Notice, whichever is later. Notwithstanding the foregoing, a statement that any person may be heard by the Commission on any matter or objection regarding the proposed Staplin Creek Substation EM&CP by filing written comments with the Secretary and the Certificate Holder within 21 days of the date the proposed EM&CP was filed with the Commission, or within 21 days of the date of the newspaper publication of a copy of the Staplin Creek Substation EM&CP Filing Notice, whichever is later.

NG Response 28: *National Grid will comply. Please refer to Response to Condition 27.*

CONDITION 29. A certificate of service evidencing service of the EM&CP Filing Notice as required above shall be filed with the Secretary within three (3) business days after the time the proposed EM&CP is filed, and shall be a condition precedent to approval of the EM&CP. When available, proof of publication of the newspaper notice(s) of filing the proposed EM&CP, including a copy of such notice, shall be filed with the Secretary.

NG Response 29: *National Grid will comply.*

CONDITION 30. After the EM&CP has been approved by the Commission, the Certificate Holder shall employ the following procedures for any proposed changes to the Commission approved EM&CP:

- a) The Certificate Holder shall submit a written report of any proposed changes (each a "Notice of Change") to the approved EM&CP to DPS Staff. DPS Staff will refer any Notice of Change that will not result in any increase in adverse environmental impacts or are not directly related to contested issues decided during the proceeding to the Chief of the Transmission Siting ("Transmission Siting") Section of the Office of Renewable Energy Siting and Electric Transmission, or equivalent position, or their designee ("Chief of Transmission Siting") for approval (each a "Minor EM&CP Change"). At the option of the DPS Staff representative, a Minor EM&CP Change may be verbally approved in the field prior to receiving written confirmation and approval by the Chief of Transmission Siting or their designee. DPS Staff will refer all other Notices of Change to the Commission for approval.
- b) Upon being advised that DPS Staff will refer a proposed change to the Commission, the Certificate Holder shall notify all parties electronically and all property owners, residents (if different from owners), or lessees whose property is affected by the proposed change by first class mail. The notice shall: (1) describe the original conditions and the requested change; (2) state that documents supporting the request are available for inspection at specified locations; (3) state that the persons may comment by writing or calling (followed by written confirmation) to the Commission within twenty-one (21) days of the notification date; and (4) provide the Secretary's phone number, mailing address and

instructions for electronic filing of comments. Any delay in receipt of written confirmation will not delay Commission action on the proposed change.

- c) The Certificate Holder shall not execute any proposed change until it receives written approval from the Chief of Transmission Siting or the Commission in accordance with paragraph (a) of this condition, except in emergency situations threatening personal injury, property damage, or severe adverse environmental impact, or as specified in the approved EM&CP. Any oral approval from DPS Staff will be followed by written approval from the Chief of Transmission Siting, or the Commission, in accordance with Certificate Condition 30(a).

NG Response 30: *National Grid will comply. A sample copy of the EM&CP Change Notice Form is provided in Appendix P.*

CONDITION 31. Deviations from the certificated centerline, design height, location, number of structures, and structure types shall be allowed for appropriate environmental or engineering reasons, except where a conflict with an explicit provision of the Certificate would be created. An explanation for the proposed deviation and supporting documentation shall be provided in the EM&CP.

NG Response 31: *National Grid will comply. Please refer to Section III.B.1 for additional detail.*

CONDITION 32. The Certificate Holder shall not commence construction of any portion of the Project, the preparation of the site for the construction of any portion of the Project, or any proceedings under the Eminent Domain Procedure Law ("EDPL") to acquire property rights with respect to any portion of the Project until the Commission has approved the EM&CP for such portion of the Project. To calculate the three-year period for acquisition of property pursuant to the EDPL, the date of Commission approval of the EM&CP covering the affected parcel shall be regarded as the date on which this Article VII proceeding was completed. Surveying, soils testing, and other such activities as are necessary for preparation of the final design plans for the Project do not constitute the construction of any portion of the Project or the preparation of the site for construction of any portion of the Project.

NG Response 32: *National Grid will comply. If and to the extent National Grid needs to acquire permanent ROW, temporary ROW, or off-ROW access for the Project and cannot secure such property rights through voluntary negotiations with property owners, National Grid will seek such rights pursuant to the Eminent Domain Procedure Law. National Grid will not commence such proceeding(s) until the Commission has approved the EM&CP for the relevant portion of the Project.*

CONDITION 33. The Certificate Holder is hereby authorized upon approval of these Certificate Conditions by the Commission to improve and utilize the laydown or marshalling yards described in Appendix H of the Joint Proposal. The Certificate Holder shall provide DPS Staff five (5) days' notice of its commencement of preparation of each

marshalling yard. In Appendix H to the Joint Proposal, National Grid has identified two (2) marshalling yards, which are proposed for use immediately following approval of these Certificate Conditions: (i) 35 Bert Howard Road, Hastings, Oswego County, New York, and (ii) County Route 48, Sandy Creek, Oswego County, New York.

NG Response 33: *National Grid acknowledges this Condition and will comply with the notice requirement therein. In addition to the two marshalling yards mentioned in Certificate Condition 33 (Bert Howard Marshalling Yard and Coffin I Marshalling Yard), National Grid also proposes the use of the Coffin II Marshalling Yard for the Project, which was referenced in Appendix H to the Joint Proposal.*

CONDITION 34: The Certificate Holder is hereby authorized upon approval of these Certificate Conditions to conduct demolition site work on the properties identified and as described in Appendix F to the Joint Proposal, including installation of site security measures, investigatory work, demolition, and environmental protection measures (“Demolition Work”). Prior to commencing Demolition Work on any property identified in Appendix F, the Certificate Holder shall provide to DPS Staff confirmation that the Certificate Holder has received all real property rights, as well as any necessary municipal or State authorizations. The Certificate Holder shall provide DPS Staff five (5) days’ notice of its commencement of the Demolition Work at any identified property. At least ten (10) days prior to commencing Demolition Work on a property identified in Appendix F to the Joint Proposal, the Certificate Holder shall provide notice to the owners and residents (if different from the owners) of all properties that abut the property, and to the applicable municipality.

NG Response 34: *National Grid acknowledges this condition and will comply with the notice requirements therein.*

F. NOTICE AND PUBLIC COMPLAINTS

CONDITION 35. The Certificate Holder shall make available to the public a toll-free or local phone number of an agent or employee who will, for the duration of the construction of the Project, be available to receive complaints, if any, from the public about the construction of the Project. That number shall include a recorded outgoing message that will, when a call is not answered by a person, provide the caller with: (i) the number to be called at any time in case of emergency; (ii) the phone number of the Secretary; (iii) the phone number of the Commission’s Transmission Siting Section.

NG Response 35: *National Grid will comply. Please refer to Response to Condition 36.*

CONDITION 36. The Certificate Holder’s Project website shall provide a means for the public to communicate to the Certificate Holder about the Project (e.g., to register complaints or ask questions) through either a direct link to a complaint form or email or by providing the contact information (phone and email address) of a representative of the Certificate Holder who can respond to communications that include questions and

concerns about the Project from members of the public. The Certificate Holder shall post construction notices and other publicly relevant information to the Project website.

NG Response 36: *National Grid will comply. Please also refer to Response to Condition 37.*

CONDITION 37. The Certificate Holder shall report to DPS Staff every complaint that cannot be resolved, and describe the actions taken to address the complaint, within ten (10) business days after the receipt of the complaint. The Certificate Holder shall retain a record of complaints received, which record shall be made available to DPS Staff upon request.

NG Response 37: *National Grid will comply. National Grid will respond to complaints in a timely manner. The Project Engagement Specialist will be the point of contact for public inquiries and complaints. Construction crews working along the ROW will be supplied with Project field cards, and/or door hangers, all of which will include contact information for the Project Team (i.e., the Project hotline number and Project website URL). Public concerns or complaints regarding the construction of the Project can be conveyed to National Grid via the toll-free telephone number 844-236-5977. In addition, public concerns or complaints can be submitted to National Grid via the Project website: <https://upstateupgrade.nationalgrid.com/project-hub/black-river-clay> and via the following email address: UpstateUpgradeCNY@nationalgrid.com.*

A Project Contacts List is provided in Appendix K. The EM&CP which is filed with the Commission will be made available for public review at each of the public libraries and other locations listed in the EM&CP Filing Notice (Appendix I).

National Grid will report all inquiries from the public that cannot be resolved within 10 business days to DPS Staff as complaints. Inquiries that are resolved prior to 10 business days will be reported upon during the monthly site-compliance audit along with their disposition. Other significant comments, suggestions, and communications from or with the public, local governments, and other agencies will also be reviewed during the monthly audit.

CONDITION 38.

- a) No less than two (2) weeks before commencing site preparation, the Certificate Holder shall prepare and disseminate a Construction Commencement Notice to notify the public of the anticipated date that Project construction will commence, as follows:
 - i. Provide the Construction Commencement Notice to all parties to the proceeding and to all local officials, school districts, and emergency personnel along the entire Project route;

- ii. Provide the Construction Commencement Notice to local media for dissemination, including local newspaper of general circulation and a free publication (if available);
 - iii. Provide the Construction Commencement Notice for display in the libraries identified on the Service List of the Application, the Certificate Holder's Project website, and other public places (such as general stores, post offices, community centers and conspicuous community bulletin boards); and
 - iv. Provide the Construction Commencement Notice to property owners and residents of properties (if different from the owner) that are in or adjacent to the Project Right-of-Way ("ROW") by first class mail or by affixing it to the doors of the residences. If the Certificate Holder knows that the residential structure on the property is an apartment building with multiple separate dwelling units, then the notice may be affixed to the main publicly accessible door of such apartment building or prominently posted in another common area as permitted by the owner.
- b) The Construction Commencement Notice shall be written in language reasonably understandable to the average person and shall contain:
- i. A map of the Project;
 - ii. A brief description of the Project;
 - iii. A description of where to get more information about the Project, including the Project website address and the location of the document repositories;
 - iv. The anticipated date for start of site preparation and estimated date for Project completion (inclusive of restoration);
 - v. The name, mailing address, local or toll-free telephone number, and email address of an employee or agent of the Certificate Holder who will, for the duration of construction of the Project, be available to receive complaints, if any, from the public about the construction of the Project; and
 - vi. A statement that the Project is under the jurisdiction of the New York State Public Service Commission, which is responsible for enforcing compliance with environmental and construction conditions, and which may be contacted at an address, email, and telephone number to be provided in the notice.
- c) Upon distribution, and prior to the commencement of construction, a copy of the form of the notice or notices under this paragraph shall be submitted to the Secretary.

- d) The Certificate Holder shall notify all landowners who own properties that are on or abut the certified Project route of the planned construction activities and anticipated schedule affecting the abutting properties at least seven (7) days, but no more than 45 days (or longer on the specific request of the Certificate Holder agreed to by DPS Staff), prior to the commencement of such construction. The Certificate Holder shall deliver such notice by first class mail or, at its option, may instead affix the notices to the doors of the residences. The Certificate Holder shall provide a copy of the generic form of such notice to the Secretary prior to the commencement of construction.

NG Response 38: *National Grid will comply. Please refer to Appendix K for additional details.*

CONDITION 39. For the duration of Project construction, the Certificate Holder shall post and maintain on its Project website a schedule that includes at least general-level information for the public about Project activities scheduled to occur during the upcoming two-week period.

NG Response 39: *National Grid will comply. The Certificate Holder's website is available at: <https://upstateupgrade.nationalgrid.com/project-hub/black-river-clay>*

CONDITION 40. The Certificate Holder shall provide all contractors providing services for construction of the Project ("Contractors") with the complete copies of the Certificate, the approved EM&CP, the order(s) approving the EM&CP, updated construction drawings, any site-specific plans, the SPDES General Permit, NYSDOT Highway Work Permits, any permit issued pursuant to Section 404 of the Federal Clean Water Act and any Section 401 Water Quality Certification. To the extent that the listed documents are available before contracts for construction services are executed, such copies shall be provided by the Certificate Holder to its Contractors prior to execution of such contracts.

NG Response 40: *National Grid will comply.*

CONDITION 41. The Certificate Holder shall notify all Contractors that the Commission may seek to recover penalties for violation of the Certificate and other orders issued in this proceeding, not only from the Certificate Holder, but also from its contractors, and that Contractors also may be liable for other fines, penalties, and environmental damage.

NG Response 41: *National Grid will comply.*

CONDITION 42. The Certificate Holder shall inform the Secretary in writing at least five (5) days before commencing construction of the Project.

NG Response 42: *National Grid will comply.*

CONDITION 43. Each month after providing notice to the Secretary of the commencement of construction, the Certificate Holder shall provide DPS Staff, NYSAGM, NYSDEC, and Emergency Services with weekly status reports summarizing construction and indicating construction activities and locations, including NYSDEC-regulated wetlands, adjacent areas, and streams scheduled for the next month.

NG Response 43: *National Grid will comply. A copy of the proposed Monthly Status Report Form is provided in Appendix Q.*

CONDITION 44. Within ten (10) days after the Project is fully constructed and placed in service, the Certificate Holder shall notify the Secretary in writing of that fact.

NG Response 44: *National Grid will comply. For the purposes of this notification, National Grid defines in-service as any line or lines fully operational at their final operating voltage over the full design length of the circuit for a given Phase of construction.*

CONDITION 45. Within ten (10) days after the completion of final restoration of the Project, the Certificate Holder shall notify the Secretary in writing that all restoration has been completed in compliance with this Certificate and the order(s) approving the EM&CP.

NG Response 45: *National Grid will comply. Final restoration will be deemed complete upon the SWPPP inspector's determination that a uniform perennial vegetative cover with a density of 80% has been achieved over all disturbed areas, unless otherwise specified in Appendix AE.*

CONDITION 46. The Certificate Holder shall electronically file (such as a pdf) with the Secretary as-built plan and profile drawings within six (6) months of Project completion. All final drawings shall be reviewed and stamped by a licensed professional engineer.

NG Response 46: *National Grid will comply.*

G. CONSTRUCTION, OPERATION, MAINTENANCE, AND RESTORATION

CONDITION 47. The Certificate Holder shall not proceed with construction until it has received a "Notice to Proceed with Construction" from the Chief of Transmission Siting. Construction means the beginning of tree clearing, site clearing, ground disturbance, site preparation, and grading activities related to installation of the Project. Commencement of Construction does not include:

- a) Preconstruction activities, which are activities to determine the adequacy of the site for construction and to prepare filings (including final design plans for the EM&CP) pursuant to this Certificate, including soils or groundwater testing (such as geotechnical drilling), surveying, ROW staking, limited staging, and limited tree cutting, mowing, clearing, and matting that are required to perform such activities;

- b) Receiving Project construction materials or construction equipment at a pre-existing storage location that is not specific to the Project (provided that the Certificate Holder provides notice to DPS Staff prior to EM&CP approval and then notes such storage locations in the EM&CP) or receiving project construction materials or construction equipment at the marshalling yard(s) described in Certificate Condition 33 and Appendix H of the Joint Proposal. The Applicant has identified two (2) marshalling yards, which are described in Certificate Condition 33: (i) 35 Bert Howard Road, Hastings, Oswego County, New York, and (ii) County Route 48, Sandy Creek, Oswego County, New York; and
- c) Routine maintenance of the existing ROW prior to construction.

NG Response 47: *National Grid will comply. Note that additional marshalling yards are contained in Appendix AH.*

CONDITION 48.

- a) At least two (2) weeks prior to the start of construction of the Project, the Certificate Holder shall hold a preconstruction meeting to which it shall invite its Contractors, DPS Staff, NYSAGM, NYSDOT, and the NYSDEC. An agenda, the location and an invitee list shall be agreed upon between DPS Staff and the Certificate Holder. The meeting invitation shall be distributed at least ten (10) days prior to the meeting date.
- b) Maps showing designated travel routes, construction worker parking and access road locations and a general Project schedule will be available at the meeting for the attendees.
- c) The Certificate Holder shall supply draft minutes from this meeting to a representative of DPS Staff for corrections or comments, and thereafter the Certificate Holder shall issue the finalized meeting minutes to all attendees.
- d) If, for any reason, the Contractors cannot finish the construction of the Project, and one or more new Contractors are needed, there shall be another preconstruction meeting with the same format as outlined above.

NG Response 48: *National Grid will comply.*

CONDITION 49. The Certificate Holder shall confine construction and subsequent maintenance to the Project ROW or as otherwise certified and to additional work areas as detailed in the EM&CP.

NG Response 49: *National Grid will comply. The facility ROW and all proposed additional work areas are shown on the EM&CP Plan and Profile drawings provided in Appendix A. To the extent that additional work area or soil disposal locations are identified during the course of construction, these areas shall be reviewed for RTE species, natural resources, cultural resources and against the design of the Project to ensure no adverse impact will*

be created prior to filing an EM&CP Change Notice as outlined in National Grid's Response to Condition 30.

CONDITON 50. At least two (2) weeks prior to the commencement of construction in any area, the Certificate Holder shall: (a) delineate both edges of the Project ROW; (b) mark out or delineate all access roads and all work areas; (c) mark out or delineate all sensitive resources, including known archeological, T&E habitat, wetlands, state-regulated adjacent area boundaries; and (d) notify DPS Staff when the above-described field mark outs and delineations are completed. After the ROW is initially cleared, all then-known danger trees on land adjacent to either edge of the ROW as certified will be marked out for removal.

NG Response 50: *National Grid will comply.*

CONDITION 51. Construction activities on the Project shall be confined to the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday, except that unless otherwise approved by DPS Staff, no construction activities shall be permitted for the following holidays: Independence Day, Labor Day, Thanksgiving Day, Christmas Day, and New Year's Day. If, due to safety or continuous construction requirements, construction activities are required to occur on Sundays, before 7:00 a.m. or after 7:00 p.m. Monday through Saturday, the Certificate Holder shall notify the affected municipality and County and request DPS Staff approval. Such notice and request for approval shall be given at least 24 hours in advance unless the construction activities are required for safety reasons that arise less than 24 hours in advance.

NG Response 51: *National Grid will comply.*

CONDITION 52. Each construction activity shall be described in detail in the EM&CP, including if those activities will take place outside of the time window specified in Condition 51.

NG Response 52: *Several distinct construction activities will progress in a coordinated and orderly manner from one point to another along the entire length of the Project. A description of these activities follows.*

Surveying and Staking

Prior to conducting any construction activities, surveying activities will be conducted to identify and delineate both edges of the Project ROW, on and off-ROW access, work pads and wire pulling sites and wetland boundaries. The limits of the above mentioned features and all other areas of disturbance are shown on the EM&CP Plan and Profile Drawings in Appendix A.

Installation of Erosion and Sediment Control Measures

Erosion and sediment control measures (silt fence, stabilized construction entrances, silt sock, etc.) will be installed prior to conducting any activities that result in ground disturbance. All erosion and sediment control measures are shown

on the EM&CP Plan and Profile Drawings in Appendix A and in the proposed SWPPP document in Appendix G.

Preparation of Marshalling Yards and Delivery of Materials

National Grid has identified three (3) sites to serve as the primary marshalling yards for the Project. The sites are the following: Bert Howard Marshalling Yard located at 35 Bert Howard Road, Town of Hastings, Oswego County, New York; Coffin I Marshalling Yard located on County Route 48, Town of Sandy Creek, Oswego County, New York; and Coffin II Marshalling Yard located at 100 Cobb Drive, Village of Lacona, Oswego County, New York. All are shown on drawings in Appendix AH. All of the sites were formerly used for commercial operations and require no significant improvements prior to receiving materials. A site-specific SWPPP will be prepared and filed for approval with NYSDEC for each site prior to the start of any site preparation. Erosion and sediment controls will be installed onsite as needed and otherwise directed by the SWPPP. Erosion and sediment controls will be maintained throughout the duration of the yard's use and regularly monitored by the Environmental Inspector.

ROW Clearing / Vegetation Management

Within the existing ROW and any newly acquired Operational (Gross) Easement, trees and shrubs will be mowed or cleared to provide unimpeded and safe access to proposed structure work sites. Shrubs and low growing vegetation will be retained if they do not interfere with construction activities or the operational integrity of the line. Certain trees located adjacent to the existing ROW and any newly acquired Operational Easements that are determined to pose a reliability hazard to the transmission line facility (danger trees) will be side trimmed or removed. In areas where residential landscape plantings occur, each tree has been evaluated for removal based on species, growth rate and location on the ROW and trees to be removed are shown on the EM&CP Drawings. All cut material will be either chipped or removed from the Project ROW except in some wetland areas where vegetation may be dropped and lopped to minimize disturbance. No cut or chipped material will be left on the Project ROW in residential or commercial areas.

The specific clearing and vegetation management techniques as well as the slash disposal techniques to be used are shown on a site-by-site basis on the EM&CP Plan and Profile Drawings in Appendix A.

Upon the completion of construction, the existing ROW together with any newly acquired Operational Easements will be maintained under the Company's ROW management policies and the then-effective TROWMP adopted by the Commission pursuant to 16 NYCRR Part 84 except where a conflict with a provision of the Certificate would be created. Management of the ROW will result in the same herbaceous and shrub cover type that presently occurs on the existing ROW. Additionally, National Grid's Forestry Practices are included in Appendix F.

Access Roads

Beginning at the point of entry at each public highway, access roads allow for the movement of men and equipment to work locations along the Project ROW. In order to construct this Project, it will be necessary to gain access with heavy equipment to all of the proposed structure locations as well as to existing structures that are scheduled for removal. The type of heavy equipment necessary to install steel pole structures with concrete foundations makes it necessary to have a stable improved road surface to every structure location. This will be accomplished by improving existing gravel access roads (Work Area-Existing Permanent needs improvement), constructing new permanent gravel access roads (Work Area- New Permanent Install), constructing new permanent porous pavement roads (Porous Pavement or "Geoweb") or using temporary timber mats (Work Area- Matting).

There are currently no permanent gravel or porous pavement roads prescribed for this Project. Gravel and Porous Pavement roads are typically prescribed for upland, nonagricultural areas where a permanent road is desired for future inspection and maintenance of the new transmission facility. Porous Pavement roads are prescribed where the construction of traditional gravel roads creates runoff concerns. The use of a "geoweb" in the Porous Pavement design allows for the transfer of vehicle weight thereby minimizing soil compaction and creating an underlying gravel reservoir that will provide storage of water reducing runoff rates and volumes.

Temporary timber mat roads will be used primarily in sensitive areas such as wetlands, residential areas and areas of active agriculture. The Contractor may choose to use temporary timber mat roads for other applications based on time of year, site conditions and cost. In some instances, such as where a long stretch of road crosses a small protrusion or finger of a federal wetland, National Grid may choose to construct a permanent road instead of temporary matting and conduct wetland mitigation to compensate for any loss of wetland function and benefit. In addition, in some limited instances where construction activities are minimal, the number of trips across a sensitive area can be minimized and construction can be limited to times of dry or frozen soil conditions, the use of Low Ground Pressure Equipment may be prescribed in-lieu of temporary timber mat roads.

In areas where the existing lines traverse commercial/industrial areas, existing paved and gravel surfaces, parking lots and travel lanes that offer good access to the structure locations will be used to the fullest extent practicable to minimize disturbance during construction. Minor improvements to the existing surfaces will be made as necessary and all areas will be restored to pre-existing conditions.

In areas designated as "Improve As Necessary", temporary gravel access may be used by the Contractor on an as-needed basis. Upon completion of construction, all temporary gravel access roads will be removed or restored to a permeable condition.

Significant environmental impacts to existing vegetation, water, and soil resources will be avoided by using and/or improving existing access roads or paths to the

maximum extent possible and by properly locating any new access roads that may be required. The siting of new access roads will be based primarily on factors such as the avoidance of environmentally sensitive resource areas (i.e., wetlands and agricultural fields); facilitation of future maintenance work; minimization of potential erosion problems; and maximization of the use of existing roadways. In addition, with permission from affected landowners, off-ROW access may be prescribed in certain locations to avoid or minimize impact to sensitive site conditions such as steep slopes, streams, wetlands and agricultural operations.

Mitigation measures such as the use of temporary timber mats or low ground pressure equipment will be prescribed on a site-by-site basis in environmentally sensitive areas such as wetlands, streams, areas of active agriculture and residential areas. In addition, erosion and sediment control measures designed to maintain and protect soil and water resources both during and after construction, including during restoration, will be prescribed for all areas where soil disturbance occurs.

The location and type of all access roads, both on and off-ROW, and all mitigation measures and erosion and sediment control measures are shown on the EM&CP Plan and Profile Drawings in Appendix A.

Culvert Installations and Drainage Improvements

Temporary culverts may be installed, existing culverts replaced, and drainage improvements will be made as necessary along all segments of the Project. The locations of all installations and improvements are shown on the EM&CP Drawings in Appendix A and references to said improvements are contained in Appendix G (SWPPP).

Direct Embedded Foundations

The Project proposes to employ two (2) types of foundations for the transmission line structures. Typical tangent, single circuit steel pole suspension structures are proposed to have direct embed foundations. The direct embedded foundation consists of placing a steel pole directly into a 12-gauge CMP (commonly referred to as a culvert), to a specified depth determined in final design, typically 10% of the structure height plus six additional feet. Upon setting the pole within the culvert, crushed stone backfill will be placed in the space remaining between the pole and the inside area of the culvert and tamped at no greater than twelve-inch intervals. The purpose of the culvert is to provide a grounding system for the structure as well as to provide a foundation of suitable character to support the structure loadings. Diameters of these culverts will range from four (4) to five (5) feet depending upon the diameter of the steel pole. Steel pole structures designed for line angles, relatively long spans, wire pulling locations, and deadend locations will be self-supporting and will typically be set on reinforced concrete caisson foundations. These concrete foundations will range from six (6) to ten (10) feet in diameter and set to a depth of fifteen (15) to forty (40) feet depending upon structure loading and soil conditions. However, should existing soil conditions, structure loading, and costs dictate the need, alternate foundation types, such as,

vibratory caissons, micropiles, helical piles, rock anchors, will be used. This will be detailed in the EM&CP. Culvert diameters are listed for each direct embed structure, as appropriate, in Appendix A.

Structure Installation

Additional details regarding structure installation are provided in Section I.C above and in the drawings in Appendix AA. Several structure types will be used for the Project. The primary structure type for the proposed Lines will be LD Steel Pole Davit Arm Suspension Single Circuit and Engineered Steel Davit Arm Deadend Single Circuit. The galvanized steel will have a grayish finish. In instances where an existing tap needs to be re-established from the proposed lines, single circuit phase over phase galvanized steel single pole structures will be utilized. New structures which will be installed to support switches will be galvanized steel, single circuit single poles with the phases configured in a vertical arrangement. Typically, it is assumed that replacement structures will generally be located between 10 to 15 feet ahead or back of the existing structure locations (1:1 replacement, offset, and one new circuit typically offset 50 feet from the existing centerline), resulting in the average span length of approximately 525 feet.

Wire Stringing

All wire stringing sites are identified on the EM&CP Plan and Profile Drawings in Appendix A and listed in Appendix N. The aerial ground wire type proposed to be utilized on the rebuilt lines will be a 0.661" 96 count DNO-13121 all corning glass OPGW for the full length of the Project. In select locations, an additional 19#5 aerial ground wire may be utilized where additional protection is required. In locations where the rebuilt lines cross under existing overhead electric transmission lines, the aerial ground wire may be terminated at the structures on either side of the crossing to ensure that proper clearances to the crossing circuits are maintained. In these instances, the Applicant may elect to install either an underslung span of OPGW or ADSS cable or buried ADSS cable in conduit to ensure the continuity of the fiber optic cable.

During wire stringing, temporary guard structures will be placed at all highway, railroad, hiking trail, navigable waterway crossings, and near existing utility lines to ensure public safety and the continued operation of other utility equipment. Wire stringing sites will be designated at selected structure locations on the Project ROW. In some areas it may be necessary to acquire temporary property rights beyond the Project ROW in order to allow for the proper set-up and operation of the mechanized pulling equipment and conductor reels. Wetlands and other sensitive environmental areas will be avoided to the extent possible. If avoidance is not possible, temporary timber mats or other appropriate protective measures will be implemented. All wire stringing sites are identified on the EM&CP Plan and Profile Drawings in Appendix A and listed in Appendix N.

Structure Removal

The removal of existing wood pole structures will take place on all of the Project segments. Wood pole structures will be pulled from the ground and transported to

the nearest road crossing that is accessible by truck for subsequent pick up and transport for disposal to a licensed landfill or incinerator. In sensitive areas such as wetlands or near stream banks where pulling the pole would cause significant ground disturbance, the pole butt may be cut flush with the ground and left in place. All steel or metal components, including conductor, cable, wire, etc., as well as the old insulators will be collected for reuse or recycling as directed by National Grid's Investment Recovery department. For structure removal, existing access roads will be utilized wherever possible and will be improved only as necessary to provide safe and effective equipment access to each structure location where removal is scheduled. For the most part, access for structure removal will be on the same access used for the installation of the new structures. Where necessary, timber matting or other lighter matting will be prescribed to prevent significant rutting and soil disturbance. Except in wetlands, all holes or cavities created by the removal of old facilities will be filled to the same level as the adjacent area plus six (6) to twelve (12) inches of additional soil to allow for settling and all disturbed areas will be seeded and mulched.

Clean-up and Restoration

Clean-up and restoration activities will be conducted as required along the entire Project ROW. Clean-up and restoration activities include, but are not limited to, the removal of all equipment and construction debris from the Project ROW; removal of temporary erosion controls and matting; the restoration of wetlands and stream banks; re-grading of disturbed areas; temporary or permanent seeding and mulching; reseeding or restoration of agricultural fields; and removal of temporary access roads and stream or wetland crossings. The specific restoration measures to be implemented will depend on the location and site-specific condition of the Project ROW.

CONDITION 53. In connection with ROW vegetation clearing for the Project, the Certificate Holder shall:

- a) Comply with the provisions of 6 NYCRR Part 192, "Forest Insect and Disease Control," and Environmental Conservation Law ("ECL") § 9-1303, with any quarantine orders issued thereunder.
- b) Note on the EM&CP drawings the clearing and disposal techniques;
- c) Not create a maximum wood chip depth greater than three (3) inches, except for wood chip roads or for invasive species control;
- d) Utilize the wood resource generated by the clearing in accordance with sound environmental techniques;
- e) Not store or dispose of wood chips in wetlands, floodways, agricultural fields, or within 50 feet of regulated streams.

- f) Limit clearing of natural vegetation during construction to that material which poses a hazard or hinderance to the construction, operation or maintenance of the Facility. Snags which provide shelter in streams for fish shall not be disturbed unless they cause serious obstructions, scouring or erosion;
- g) During construction, after the initial phase of tree clearing, except as part of a storm response, the Certificate Holder shall not remove any identified danger trees until it has received authorization from DPS Staff. The Certificate Holder shall report any additional danger trees it identified to DPS Staff as soon as practicable. The Certificate Holder shall allow for a site inspection and provide materials DPS Staff requires to support authorization for removal, such as photographic demonstration.
- h) Not remove or grind stumps within 50 feet of streams unless construction necessitates removal below grade; and
- i) Not fell any trees into any stream or onto the immediate stream bank.

NG Response 53: *National Grid will comply. National Grid intends to 1) delineate ROW boundaries 2) identify, mark, and document apparent danger trees 3) provide danger tree documentation to DPS staff for approval 4) conduct clearing after all certificate conditions have been satisfied 5) while clearing is in process identify and document any additional danger trees that become apparent 6) document and notify DPS staff of the additional danger trees identified 7) upon approval by DPS staff, remove the additional danger trees. Approval and removal will be expedited to avoid unnecessary operational costs. National Grid's Forestry Practices are included in Appendix F.*

CONDITION 54. Neither the Certificate Holder, nor any Contractors in its employ, shall construct any new, or improve any existing, access road unless such road is described in the EM&CP. Should the need arise for additional off-ROW access, the Certificate Holder shall follow the EM&CP change procedures recited in Certificate Condition 30.

NG Response 54: *National Grid will comply.*

CONDITION 55. The following stormwater, erosion, and sedimentation conditions shall be applicable to the Project:

- a) The Certificate Holder shall include in the EM&CP a draft Storm Water Pollution Prevention Plan ("SWPPP") and, a copy of the electronic Notice of Intent ("eNOI") it intends to file requesting coverage under NYSDEC's then-current SPDES General Permit for Stormwater Discharges associated with Construction Activity ("CGP") and with respect to the SPDES. If obtained by the time the EM&CP is filed, the EM&CP shall also include any required municipal separate storm sewer system ("MS4") acceptance form. Once the EM&CP is approved, the final SWPPP, filed eNOI, and NYSDEC Letter of Authorization shall be provided to DPS Staff and NYSDEC.

- b) The Certificate Holder shall adhere to the NYSDEC's current NYS Standards and Specifications for Erosion and Sediment Control ("NYSSESC"), also known as the "Blue Book" as well as the New York State Stormwater Management Design Manual ("DM").
- c) To the maximum extent practical prior to construction at a location requiring the installation of temporary erosion and sediment control practices (e.g., silt fences, straw bales, and structural diversions) as indicated in the EM&CP, the Certificate Holder shall install such measures, which shall be installed by no later than the end of the workday in which site disturbance occurs.
- d) Use of hay bales is prohibited.
- e) Special conditions and erosion and sediment controls shall be prescribed on the EM&CP Plan & Profile drawings.
- f) All erosion control fabric or netting must be 100% biodegradable natural product, excluding geotextiles used for road construction and temporary erosion control devices such as silt fence and silt sock.

NG Response 55: *National Grid will comply. The proposed SWPPP associated with this Project, including all pertinent signoffs, is provided in Appendix G. Appendix Z captures those special conditions and erosion and sediment controls at each location requiring a grading plan necessary to construct the Project in accordance with the proposed SWPPP. The Project will be subject to the requirements of a MS4 review and approval in the Village of Central Square and the Towns of Clay, Cicero, Hastings, and Rodman. As such, National Grid will seek to have the SWPPP reviewed and the MS4 SWPPP Acceptance form signed by each of the respective municipalities.*

CONDITION 56. The Certificate Holder shall restore disturbed construction areas to original grades and conditions with permanent vegetation and erosion controls appropriate for those locations unless the EM&CP specifies otherwise.

- a. Disturbed pavement, curbs, and sidewalks shall be restored to their original preconstruction condition or better.
- b. Areas that are in a stable unvegetated state at the time of filing (including but not limited to natural unvegetated states such as thin soils, gravels soils, rock outcrops, sand dunes) will be identified in the EM&CP and will not be required to reach 80% cover regrowth so long as the Certificate Holder can show the area has been adequately stabilized without vegetative cover.

NG Response 56: *National Grid will comply. The proposed SWPPP associated with this Project, including the kind of erosion control fabric to be used, is provided in Appendix G. The Grading Plans are also included in Appendix Z. Appendix AE includes details for*

areas identified as previously unvegetated areas within the Project. All other areas will be restored to 80% vegetative cover.

CONDITION 57. Prior to the start of construction, the Certificate Holder shall be required to inspect, document, and photograph existing conditions of culverts. Certificate Holder shall not be responsible for repairing culverts that have been damaged prior to the start of construction. The Certificate Holder shall be responsible for checking all culverts and assuring that they are not crushed, blocked, or otherwise damaged during construction and restoration of the Project. If a culvert is crushed, blocked or otherwise damaged and nonfunctional, the Certificate Holder shall repair the culvert or replace it with alternative measures appropriate to maintaining proper drainage, aquatic connectivity and stream flow, as applicable. Culvert repairs or replacements shall follow specifications in the EM&CP. These photographs and documents will be made available to Staff upon request.

NG Response 57: *National Grid will comply. Existing culverts will be replaced if damaged and any temporary culverts will be removed post construction to ensure the proper drainage is maintained. Existing culvert locations are depicted in Appendices G and Z of the EM&CP.*

CONDITION 58. The Certificate Holder shall, upon completion of construction of the Project:

- a. Conduct an assessment of the need for additional restoration work, and landscape improvements, including vegetation planting, earthwork or installed features to screen or landscape the Facility with respect to road crossings, residential areas or substations;
- b. Prepare plans for any visual mitigation found necessary, and, in connection therewith, removal, rearrangement and supplementation of existing landscape improvements or plantings should be considered, as appropriate except where such mitigation would be in direct violation of the Certificate Holder's TROWMP;
- c. Consult with DPS Staff on content and execution of its assessment, resultant landscaping plan specifications and material list; details shall include measures for third party or wildlife damage or other causes of damages to any landscape and vegetation plantings; and
- d. Present draft assessments and plans to DPS Staff for acceptance and file a final plan with the Secretary within one year after the completion of construction of the facility.

NG Response 58: *National Grid will comply.*

CONDITION 59. The EM&CP shall include plans to prevent unauthorized access to and along the Project ROW. Plans may include the following:

- a) Posting signs at the ROW edges in those locations where the ROW intersects public roads;
- b) Performing outreach to educate and inform the public concerning the risks and impacts of unauthorized access;
- c) Working with local law enforcement officials in an effort to prevent future trespassing;
- d) Identifying construction and material details of gates and berms; and/or
- e) Identifying existing and proposed gate locations on the Plan and Profile drawings. Final determination of locations of gates and berms shall be made during a post-construction assessment of the Facility, in consultation with DPS Staff.

NG Response 59: *National Grid will comply. The plan to prevent unauthorized access to and along the facility ROW is as follows:*

NG Response 59a: *National Grid will place signs at the intersection of the Facility ROW edges and all public roads to inform the public that unauthorized access is prohibited and that trespassers will be prosecuted.*

NG Response 59b: *National Grid will notify abutting landowners and residents on the commencement of construction within the utility ROW. Additional details regarding public outreach can be found within Appendix K.*

NG Response 59c: *Upon the completion of construction, National Grid will inform local law enforcement that the Project has been completed and that signs have been placed to inform the public that unauthorized access is prohibited and that trespassers will be prosecuted. National Grid will provide local law enforcement its full cooperation in prosecuting non authorized users and trespassers on the Facility ROW.*

NG Response 59d and 59e: *The location of all existing fences and gates and the location of all proposed fences, gates, and barriers to be initially installed on the Facility ROW are shown on the EM&CP Plan and Profile Drawings in Appendix A. Construction and material details for those installations are shown in Appendix AC.*

CONDITION 60. The EM&CP shall include a plan for removal, re-use, recycling and disposal of all existing equipment (e.g., transformers, wood poles, conductors, etc.) and respective work areas, including guying wire assembly and disassembly sites, shall be thoroughly cleared of debris such as nuts, bolts, spikes, wire, pieces of steel, and other assorted items. Existing transmission facility components removed or replaced as part of the Project shall be removed from the ROW to appropriate destinations and handled appropriately for re-use as available based on conditions. To the extent allowed by easements or lease agreements, non-Project debris found in the ROW that will interfere

with maintenance of the ROW is to be removed during construction. The Certificate Holder shall not bury construction debris in the ROW.

NG Response 60: *National Grid will comply. National Grid plans to transport used wood poles to the nearest ROW street crossing location that is accessible by truck for subsequent pick up and disposal to a licensed landfill or incinerator. The steel structures that are to be replaced will be cut and stub angles will be left in place and cut off at least 48 inches below grade in agricultural areas, at least eighteen (18) inches below grade in all other areas unless otherwise directed by National Grid's Construction Field Supervisor. The scrap steel will be transported to the nearest ROW street crossing location that is accessible by truck for pickup. To the extent the scrap steel does not contain interior concrete, the scrap steel will be tested for lead paint in accordance with standard National Grid procedures. Steel with excessive levels of metal-containing paints will be placed in open roll-offs and delivered to an approved recycling facility. Special precautions and/or special handling are not required; however, the recycling facility will be notified in writing that the steel is coated with metal-containing paint. National Grid's Investment Recovery department will facilitate the reuse or recycling of all steel or metal components to be removed, including conductor, cable, wire, etc., as well as the old insulators. Any old concrete foundations will be removed to a minimum of eighteen (18) inches below ground level (except in agricultural areas, where they will be removed to at least forty-eight (48) inches below grade). Any other concrete waste will be removed from the ROW and transported to a concrete salvage facility, if available, or it will be transported to a licensed construction and demolition (C&D) disposal facility or solid waste landfill.*

CONDITION 61. Unless described otherwise in the EM&CP, all trees over four inches in diameter breast height or shrubs over four feet in height damaged or destroyed by activities during construction, shall be replaced maintaining species diversity of those removed (unless otherwise requested by the property owner as long as no invasive plants are requested) within one year, weather permitting, after completion of Project construction by the Certificate Holder with the equivalent type of native trees or shrubs (though not necessarily the same size), except if:

- a) DPS Staff and the Certificate Holder determine that equivalent type replacement trees or shrubs would be contrary to the Certificate Holder's TROWMP, or would interfere with the proper clearing, construction, operation or maintenance of the certified Project;
- b) replacement would be contrary to sound ROW management practices, the Certificate Holder's TROWMP, or any approved long-range ROW management plan applicable to the Facility; or,
- c) after consultation with the owner, the owner (or other recorded easement or license holder with the right to control replacement of land where the damaged or destroyed trees or shrubs were located) declines replacement as described above.

NG Response 61: *National Grid will comply. National Grid's Forestry Practices are included in Appendix F.*

CONDITION 62. The EM&CP shall: (a) identify plans for tree protection; and (b) indicate on the drawings where tree protection measures will be applied (if any are known at the time of EM&CP preparation).

NG Response 62: *National Grid will comply. Tree protection plans and tree protection measures are identified in the EM&CP drawings in Appendix A. Additionally, National Grid's Forestry Practices are included in Appendix F.*

H. OVERSIGHT AND SUPERVISION

CONDITION 63. The Certificate Holder shall use at least five (5) inspectors (or fewer if the Certificate Holder elects to use the same individual in more than one (1) role): (a) one environmental inspector employed full-time on the Project; (b) one (1) construction inspector employed full-time on the project; (c) one (1) safety inspector who will inspect the work site from time to time; (d) one (1) quality assurance inspector who will inspect the work site from time to time; and (e) one (1) agricultural inspector employed part-time on the Project. The environmental inspector shall have stop work authority over all aspects of the Project that would create an adverse impact on the environment. If the Certificate Holder elects to use the same individual for multiple inspection roles, the Certificate Holder must consult with DPS Staff, and NYSDEC or NYSAGM staff as appropriate and such individual must be qualified and have sufficient time and resources to adequately fulfill each role.

NG Response 63: *National Grid will comply. Information regarding the qualifications and responsibilities of the Environmental Monitor, Construction Inspector, Safety Inspector, Quality Assurance Inspector, and Agricultural Inspector can be found in Appendix W.*

CONDITION 64. During periods of relative inactivity on the Project, after consultation with and acceptance from DPS Staff, the Certificate Holder may temporarily decrease the number of hours worked by Project oversight personnel and the extent of their presence at the Project site commensurate with the decline in Project activity. Likewise, during periods of relatively high activity on the Facility, the number of inspectors and the extent of their presence at the Project site may be temporarily increased commensurate with the increase in activity levels. The Certificate Holder shall describe in the EM&CP how it will ensure adequate coverage by inspectors. Construction inspections must be performed in accordance with the applicable SPDES General Permit for Stormwater Discharges from Construction Activity (currently GP-0-25-001).

NG Response 64: *National Grid will comply. National Grid proposes to have full-time personnel in these roles and will continually monitor workload to ensure there is not a need for additional personnel on site in any of these roles. Any addition of personnel in one of these roles will be cleared with DPS Staff prior to arrival on site.*

CONDITION 65. The environmental inspector(s) and the construction inspector(s) shall be equipped with sufficient documentation and transportation and communication equipment to effectively monitor each Contractor's compliance with the provisions of every order issued in this proceeding and applicable sections of the Public Service Law, the ECL and regulations issued thereunder, any Section 401 Water Quality Certification, and the EM&CP.

NG Response 65: *National Grid will comply.*

CONDITION 66. The names, qualifications, and contact information of the environmental inspector(s) and the construction inspector(s) shall be submitted to DPS Staff and NYSDEC at least two (2) weeks prior to the start of construction. The environmental inspector's qualifications shall satisfy those of a "Qualified Inspector" pursuant to the applicable SPDES General Permit for Stormwater Discharges from Construction Activity (currently GP-0-25-001).

NG Response 66: *National Grid will comply. Information regarding the qualifications and responsibilities of the Environmental Monitor, Construction Inspector, Safety Inspector, Quality Assurance Inspector, and Agriculture Inspector can be found in Appendix W.*

CONDITION 67. The Certificate Holder shall provide DPS Staff and NYSDEC with the environmental inspector's daily reports within two (2) business days of completion.

NG Response 67: *National Grid will comply.*

CONDITION 68. The Certificate Holder shall provide DPS Staff, NYSAGM, NYSDOT, NYSDEC, and Emergency Services, the cell phone numbers of the Certificate Holder's environmental monitor(s) and construction inspector(s). The environmental monitor(s) and construction inspector(s) may have direct communication with DPS Staff, NYSAGM, NYSDOT, and NYSDEC throughout the duration of construction, with the understanding that DPS will serve as the primary point of contact.

NG Response 68: *National Grid will comply. National Grid will provide the contact information (inclusive of cell phone numbers) for the Environmental Inspector(s), Agricultural Inspector(s), and Construction Supervisor(s) to DPS Staff, NYSAGM, NYSDEC, and Emergency Services, no later than two (2) weeks prior to the commencement of construction and will update as necessary over the life of the Project.*

CONDITION 69. The authority granted in the Certificate and any subsequent order(s) in this proceeding is subject to the following conditions necessary to ensure compliance with such order(s):

- a) The Certificate Holder shall regard DPS Staff representatives (authorized pursuant to PSL §§ 8 and 66(8)) as the Commission's designated representatives in the field. In the event of any emergency resulting from specific construction or maintenance activities that violate or may violate the terms of the Certificate or any other order

in this proceeding, such DPS Staff representatives may issue a stop work order for that location or activity.

- b) A stop work order shall expire twenty-four (24) hours after issued unless confirmed by a single Commissioner. If a stop work order is so confirmed, the Certificate Holder may seek reconsideration from the confirming Commissioner or the whole Commission.
- c) Before exercising such authority, DPS staff representatives will consult (wherever practicable) with the Certificate Holder's representatives possessing comparable authority. Within reasonable time constraints, all attempts will be made to address any issue and resolve any dispute in the field. In the event the dispute cannot be resolved, the matter will be brought immediately to the attention of the Certificate Holder's Project Manager and the DPS Chief of Transmission Siting. In the event that a DPS Staff representative issues a stop work order, neither the Certificate Holder nor the Contractor will be prevented from undertaking any safety-related activities as they deem necessary and appropriate under the circumstances. The issuance of a stop work order or implementation of measures as described below may be directed at the sole discretion of the DPS Staff representative during these discussions.
- d) If a DPS Staff representative discovers a specific activity that represents a significant environmental threat that is or immediately may become a violation of the Certificate or any other order in this proceeding, the DPS Staff representative may, in the absence of responsible Certificate Holder supervisory personnel, or in the presence of such personnel who, after consultation with the DPS Staff representative, refuse to take appropriate action, direct the field crews to stop the specific potentially harmful activity immediately. If responsible Certificate Holder personnel are not on site, the DPS Staff representative will immediately thereafter inform the Construction Inspector or Environmental Monitor of the action taken. The stop work order may be lifted by the DPS Staff Representative if the situation prompting its issuance is resolved.
- e) If the DPS Staff representative determines that a significant threat exists such that protection of the public or the environment at a particular location requires the immediate implementation of specific corrective measures, the DPS Staff representative may, in the absence of responsible Certificate Holder supervisory personnel, or in the presence of such personnel, who, after consultation with the DPS Staff representative, refuse to take appropriate action, direct the Certificate Holder or its contractors to implement the corrective measures identified in the approved EM&CP. The field crews shall comply with the DPS Staff immediately thereafter inform the Certificate Holder's Construction Inspector or Environmental Monitor of the action taken.

NG Response 69: National Grid will comply.

CONDITION 70. The Certificate Holder shall organize and conduct site-compliance audit inspections for DPS Staff as needed during construction of the Project, but not less frequently than once per month during the site preparation, construction, and restoration phases or as otherwise agreed between the Certificate Holder and DPS Staff. Such inspections shall conclude upon the final sign-off of the SWPPP by the SWPPP Inspector or as agreed to by the Certificate Holder and DPS Staff.

- a) The monthly inspections shall include a review of the status of compliance with all conditions contained in the Certificate and any other order issued in this proceeding and with all other legal requirements and commitments, as well as a field review of the Facility site, if necessary. The inspections also may include:
 - i. Review of all complaints received, and their proposed or actual resolutions;
 - ii. Review of any significant comments, concerns or suggestions made by the public, local governments, or other agencies, and the Certificate Holder's response(s);
 - iii. Review of the status of the Project in relation to the overall schedule established prior to the commencement of construction; and,
 - iv. other items the Certificate Holder or DPS Staff considers appropriate.
- b) The Certificate Holder shall provide a written record of the results of the inspection, including resolution of issues and additional measures to be taken, to all agencies involved in the inspection audit and as part of its scheduled construction update.

NG Response 70: *National Grid will comply. Refer to Appendix Q of the EM&CP for a sample monthly Weekly Status Report Form.*

CONDITION 71. The Certificate Holder shall within two calendar days notify DPS Staff of any activity that involves a violation of the Certificate. The Certificate Holder shall also notify NYSDEC for NYSDEC-jurisdictional areas or SWPPP violations, and NYSAGM for NYSAGM-jurisdictional areas within the same timeframe.

NG Response 71: *National Grid will comply.*

I. PESTICIDE USE

CONDITION 72. The Certificate Holder shall not perform aquatic application of pesticides (which includes herbicides) on the ROW. For all other pesticides, the Certificate Holder shall (i) consult with NYSDEC to determine the applicable applicator license(s) or DEC guidance letter regarding the application, and if any federally delegated permits are required and (ii) apply the pesticide consistent with its label. The supervising certified applicator shall be familiar with and understand the applicable provisions of this Certificate and the most recent version of the Certificate Holder's

Transmission Right of Way Management Plan (TROWMP) and ROW Maintenance Procedures, as applicable.

NG Response 72: *National Grid will comply. All pesticide applications will be made in accordance with these requirements and in accordance with the Certificate.*

CONDITION 73. If the Certificate Holder proposes to apply herbicides during or in preparation of construction on agricultural lands operated under or in pursuit of the National Organic Program according to 7 CFR Part 205, the Certificate Holder shall determine the location of such organic producers, and determine the Certificate Holder's rights to apply herbicides on such lands, and provide notification of the intended application providing ample time for the organic producer's preparation required defined boundaries and buffer zones as describe in 7 CFR Part 205.

NG Response 73: *National Grid will comply. All herbicide applications will be made in accordance with these requirements and in accordance with the Certificate and Appendix L.*

J. ROADS AND HIGHWAYS

CONDITION 74. The Certificate Holder shall delineate on the EM&CP drawings, the location of proposed temporary roads, proposed permanent roads and existing access roads. Proposed road improvements and measures for impact minimization and access control shall be in the EM&CP. The Certificate Holder shall obtain all required NYSDOT Highway Work Permits and/or NYSDOT approvals prior to construction of any proposed temporary roads, proposed permanent roads, and/or alteration of existing access roads affecting State Highways ROWs.

NG Response 74: *National Grid will comply.*

CONDITION 75. The Certificate Holder shall minimize the impact of the construction of the Project on traffic circulation. The Certificate Holder shall ensure that traffic control personnel and safety signage are employed to ensure safe and adequate traffic flow when roadways are affected by Project construction.

NG Response 75: *National Grid will comply.*

CONDITION 76. The Certificate Holder shall coordinate all work on the Project during construction at federal, state and municipal road and highway crossings with the appropriate state and municipal officials including Emergency Services and shall obtain the required authorization for such work, subject to the Commission's continuing jurisdiction as appropriate.

NG Response 76: *National Grid will comply. Highway Work Permits for local, county and NYSDOT jurisdictional road crossings will be obtained as needed, and copies of all such work permits will be provided to DPS staff prior to working within the respective highway*

boundary. Table J-1 in Appendix J provides a list of all highway permits required for this Project.

CONDITION 77. The Certificate Holder shall coordinate with the appropriate municipal agencies, including local school districts, and Emergency Services for traffic management of roads under municipal jurisdiction.

NG Response 77: *National Grid will comply. National Grid will coordinate all work activities within highway boundaries with the appropriate state and municipal agencies, school districts and police departments.*

CONDITION 78. The Certificate Holder shall consult periodically with municipal highway transportation agencies about traffic conditions near the Project site and shall notify each such transportation agency of the approximate date work will begin in its jurisdiction, using access points that take direct access from the highways in that jurisdiction. The Certificate Holder shall consult with the local fire department on a bi-weekly basis, and at least one (1) week before to notify the fire departments about traffic conditions near the Project site.

NG Response 78: *National Grid will comply.*

CONDITION 79. The Certificate Holder shall minimize direct vehicular disturbance to properties by accessing the Project ROW from existing roadways or approved off-ROW access roads identified in the EM&CP. For each road crossing and location where construction vehicles will access the Project ROW from local roadways, the Certificate Holders shall implement a Maintenance and Protection of Traffic (“MPT”) plan that identifies procedures to be used to maintain traffic and to provide a safe construction zone for those activities within the roadway ROW. The MPT plan shall address temporary signage, lane closures, placement of temporary barriers, and traffic diversion, and the transportation needs of emergency and school vehicles. The Certificate Holders shall ensure that:

- a) All signage utilized shall comply with the Federal Highway Administration (“FHWA”) Manual on Uniform Traffic Control Devices and the NYSDOT Supplement to the Manual on Uniform Traffic Control Devices. Placement of signs shall be determined in consultation with the jurisdictional agency. At a minimum, signs shall be placed at distances in accordance with the NYSDOT Sheets and Specifications, Section 619; and
- b) Flagmen shall be present at all times when equipment is crossing any public road, when equipment is being loaded or unloaded from a vehicle parked on a public road, and where two-lane traffic has been reduced to one lane. All flagging operations shall comply with 17 NYCRR Part 131 and NYSDOT Standards Sheets and Specifications, Section 619.

NG Response 79: *National Grid will comply. Maintenance and Protection of Traffic Plans (MPT plans) developed in accordance with the FHWA and NYSDOT MUTCD Manual for each road crossing are provided in Appendix J.*

CONDITION 80. In preparing the proposed EM&CP, the Certificate Holder shall consult with each transportation department or agency normally having jurisdiction over any roads in the Project vicinity that will be affected by Project construction.

NG Response 80: *National Grid has consulted with applicable transportation departments and will continue to do so.*

CONDITION 81. The Certificate Holder shall ensure that:

- a) All Project-related work within State highway rights-of-way shall be designed and performed according to the traffic and safety standards and other substantive requirements contained in 17 NYCRR Part 131, entitled *Accommodation of Utilities Within State Highway Right-of-Way*, and the NYSDOT Highway Design Manual including applicable design standards required by law or governmental regulations; and
- b) For work within roads other than state highways, if any, the EM&CP shall provide details, including provisions for minimizing the duration and extent of open excavation, if any, traffic disruptions, and work within adjoining public streets and right-of-way.

NG Response 81: *National Grid will comply. See National Grid response to Condition 79. Further detail regarding the minimization of impacts to traffic can be found in the Traffic Management Plans in Appendix X.*

K. CULTURAL RESOURCES

CONDITION 82. The Certificate Holder shall not undertake construction in previously undisturbed areas where archeological surveys have not been completed until such time as the appropriate authorities, including New York State Office of Parks, Recreation and Historic Preservation ("OPRHP") and DPS Staff, have reviewed the results of any additional historic properties and archeological surveys that are required.

NG Response 82: *National Grid will comply.*

CONDITION 83. Should archeological materials be encountered during construction, the Certificate Holder shall stabilize the area and cease all construction activities in the immediate vicinity (i.e., 164 feet) of the find and protect the find from further damage. Within 24 hours of such discovery, the Certificate Holder shall notify and seek to consult with DPS Staff and the OPRHP Field Services Bureau to determine the best course of action. No construction activities shall be permitted in the immediate vicinity of the archeological materials, except in situations threatening human life or in an emergency

situation for the protection of property, until such time as the significance of the resource has been evaluated and the need for and scope of impact mitigation has been determined.

NG Response 83: *National Grid will comply. If any unanticipated discovery is to occur, National Grid will immediately stop work as soon as safely practicable and notify and consult with DPS Staff and OPRHP Field Services Bureau to determine the best course of action.*

CONDITION 84. Should human remains or evidence of human burial(s) be encountered during the conduct of archeological data recovery fieldwork or during construction, all work in the vicinity (i.e., 164 feet) of the find shall be halted immediately and the remains shall be protected from further disturbance. Within 24 hours of any such discovery, the Certificate Holder shall notify and consult with DPS Staff and the OPRHP Field Services Bureau. Treatment and disposition of any human remains that may be discovered shall be managed in a manner consistent with the OPRHP's Human Remains Discovery Protocol. All archeological or remains-related encounters and their handling shall be reported in the status reports summarizing construction activities and reviewed in the site-compliance audit inspections.

NG Response 84: *National Grid will comply. See Appendix AD and Section III.C.13. of this EM&CP for more information.*

CONDITION 85. The Certificate Holder shall avoid creating adverse impacts on heritage resource sites, archeological sites, and historic structures in the vicinity of the Project by implementing specific Project location, design, vegetation management, resource protection, and construction scheduling measures described in the EM&CP.

NG Response 85: *National Grid will comply.*

CONDITION 86. The Certificate Holder shall have a continuing obligation during the duration of Project construction to respond promptly to complaints of negative archeological impacts and to mitigate any negative archeological impacts through on-site design modifications and off-site mitigation techniques developed in consultation with DPS Staff and the OPRHP Field Services Bureau.

NG Response 86: *National Grid will comply.*

L. TERRESTRIAL AND WILDLIFE RESOURCES

CONDITION 87: Prior to the commencement of preconstruction or construction activities, the Certificate Holder shall provide all authorized on-site personnel with information on any protected plant or animal species, or applicable habitat, identified within or contiguous to the Project Area, including marshalling yards and laydown areas, and indicate measures to avoid and minimize risks to said species during construction, operation, and maintenance. The Certificate Holder shall refer to 6 NYCRR Part 182 for lists of protected

animal species and Part 193 for plant species that are protected by State law, and any applicable federal statute, regulation, or other requirement as well as any additional species identified in Condition 88.

NG Response 87: *National Grid will comply. The USFWS IPaC system was reviewed to determine whether any federally listed T&E occurs within the Project area. The IPaC review noted the presence of three endangered species, Indiana bat (*Myotis sodalis*), northern long-eared bat (*Myotis septentrionalis*), and bog buck moth (*Hemileuca maia menyanthevora*); one proposed endangered species, tricolored bat (*Perimyotis subflavus*); two threatened species, eastern massasauga (*Sistrurus catenatus*) and American hart's-tongue fern (*Asplenium scolopendrium* var. *americanum*); and one proposed threatened species, monarch butterfly (*Danaus plexippus*), within the Project area. Consultation with the NYNHP was also performed for compliance with state-level regulations. This consultation noted the presence of six threatened species, blanding's turtle (*Emydoidea blandingii*), pie-billed grebe (*Podilymbus Podiceps*), sedge wren (*Cistothorus stellaris*), bald eagle (*Haliaeetus leucocephalus*), northern harrier (*Circus hudsonius*), and lake sturgeon (*Acipenser fulvescens*), within the Project area. Additionally Appendix I to the Joint Proposal noted the presence of two species of special concern, spotted turtle (*Clemmys guttata*) and wood turtle (*Glyptemys insculpta*), within the Project area. The Certificate Holder will refer to 6 NYCRR Parts 182 and 193 for protected animal and plant species, respectively, to determine whether any plants or animals protected by the State are within the Project area. Results of the consultation and any minimization efforts are identified within Appendix S.*

CONDITION 88: Except as may be otherwise specified in Conditions 90 to 95 herein, if any (1) threatened or endangered ("T&E") animal species identified in 6 NYCRR Part 182; (2) protected plant species identified in 6 NYCRR Part 193; or (3) any federally listed T&E species (i) is observed by the Certificate Holder in an area where there is active preconstruction, construction, or restoration activities for the Certificated Facility, including access roads and laydown yards or (ii) is identified by NYSDEC or DPS Staff as being in proximity to any facility components such that occupied habitat is likely to be present within the Project ROW or other work areas, the Certificate Holder or its designee shall:

- i. Immediately cease activities in the approximate location of the observed species until DPS Staff, in consultation with NYSDEC staff, authorizes recommencement of activities, unless such activities are necessary for protection of human life or property necessary to maintain electric reliability; and
- ii. Notify NYSDEC and DPS Staff within twenty-four (24) hours during preconstruction or construction activities and within forty-eight (48) hours during operation or maintenance activities, unless DPS Staff, in consultation with NYSDEC staff, directs otherwise; and

- iii. In addition, and as is related to any federally protected species, notify USFWS and the United States Army Corps of Engineers ("USACE") within twenty-four (24) hours during preconstruction or construction activities and within forty-eight (48) hours during operation or maintenance activities, or as otherwise directed by the applicable federal agency; and
- iv. Prior to the recommencement of activities in the secured area, provide all authorized on-site personnel with pertinent information on the species encountered and indicate measures to minimize risks to the T&E animal or plant species.

NG Response 88: *National Grid will comply. Additional information regarding T&E species can be located in Appendix S.*

CONDITION 89: The Certificate Holder shall maintain a record of all observations of State T&E or federally protected species during preconstruction, construction, or maintenance of the Project. All such observation records of T&E species, including any dead, injured, or damaged protected animal species, their eggs, or nest shall include the following information, to the greatest extent practicable: species name; number of individuals; age and sex of individuals (if known); observation date(s) and time(s); GPS coordinates (as property rights allow) of each individual observed (if a GPS is not available, the report should include the nearest road or cross road location); a photo of the species if one is taken; behavior(s) observed; a photo of the species if one is available; identification and contact number of the observer(s); the nature of and distance to any Project preconstruction, construction, restoration, or maintenance activity; and whether the death, injury, or damage to the protected species, their eggs, or nest was caused by the Certificate Holder. The Certificate Holder shall, at a minimum, provide these reports to NYSDEC and DPS Staff within 30 days of such an observation.

NG Response 89: *National Grid will comply. Additional information regarding T&E species can be located in Appendix S.*

CONDITION 90: For the avoidance and protection of bald eagles, the Certificate Holder shall implement the following measures during construction:

- a. No more than two weeks prior to the commencement of construction activities in any Project area, the Certificate Holder shall conduct a visual inspection in the area to determine if any bald eagle nests are present and consult with NYSDEC to determine if NYSDEC has records of any nests within one mile of the project area that may not have been detected by visual inspection.
- b. To avoid impacts to bald eagles from construction during breeding season, the Certificate Holder shall maintain the following buffers from nests during the period of January 1- August 31: (i) no blasting shall occur within 0.5 miles of a nest; (ii) no aircraft or drones shall be operated within 1,000 feet of a nest; and (iii) no construction activities shall occur within 330 feet of a nest. In the event that full

avoidance of impacts outlined here are not practicable and construction must occur the Certificate Holder shall follow the protocol in Condition 96.

- c. To avoid impacts to bald eagles from construction during the nonbreeding season from September 1 to December 31, no construction activities shall occur within 50 feet of a nest.
- d. If a Federal Permit requires a larger buffer than those noted in subsection b or c of this condition, that shall be noted in the EM&CP.
- e. In the event that implementing the above setback areas is impracticable, Certificate Holder shall comply with Condition 96.

NG Response 90: *National Grid will comply.*

CONDITION 91: To avoid impacts to the Northern Long-eared Bat ("NLEB") and Indiana bat as well as its hibernaculum and tree roosts, the Certificate Holder shall consult with DPS Staff and NYSDEC to comply with the substantive requirements of the ECL, and its regulations, or other guidance as then applicable, should such species be identified on or near the Project ROW. In order to ensure that the Project complies with the requirements of 6 NYCRR Part 182 for the NLEB the Certificate Holder shall implement the following measures:

- a. During preconstruction and construction, subject to clause (b) below, to fully avoid impacts to individual species and their occupied habitats, the Certificate Holder shall not conduct tree clearing activities at any time within one hundred fifty (150) feet of any known NLEB roosts, three hundred and thirty (330) feet of any known Indiana bat roost, or one quarter (0.25) mile of any NLEB or Indiana bat hibernacula unless such tree clearing activities are necessary to protect human life or property necessary to maintain electric reliability. All tree clearing activities occurring greater than these distances but within one and a half (1.5) miles of a known NLEB maternity roost site, two and a half (2.5) miles of a known Indiana bat maternity roost site or five (5) miles of a NLEB or Indiana bat hibernaculum site shall be conducted between November 1 and March 31 unless such tree clearing activities are necessary to protect human life or property necessary to maintain electric reliability.
- b. During preconstruction and construction, in the event that full avoidance of impacts to individual species and their occupied habitats as specified in clause (a) above cannot be achieved, the Certificate Holder shall consult with DPS Staff, NYSDEC, and, if applicable, USFWS, to determine what, if any, permits and/or additional authorizations are required.
- c. During preconstruction and construction, in addition to subsections (a) and (b), above, from April 1 to October 30, the Certificate Holder shall not fell any snag or cavity trees as defined under NYSDEC Program Policy ONRDLF-2 Retention on

State Forests, within the Project area unless their removal is necessary for the protection of human life or property necessary to maintain electric reliability. When necessary, snag and cavity trees may be removed after being cleared by the Environmental Monitor, who shall conduct a survey for bats exiting the tree. This survey shall begin thirty (30) minutes before sunset and continue until at least one (1) hour after sunset or until it is otherwise too dark to see emerging bats. Unoccupied snag and cavity trees in the approved clearing areas shall be removed within twenty-four (24) hours of the exit-count survey.

- d. During operations and maintenance, the Certificate Holder shall consult with DPS Staff and NYSDEC to determine the appropriate measures to implement to ensure compliance with the substantive requirements of the ECL and its regulations or other guidance as then applicable.

NG Response 91: *National Grid will comply.*

CONDITION 92: For the protection of species of special concern, the Certificate Holder shall implement the best management practices contained in Appendix I to the Joint Proposal to the maximum extent practicable. To the extent the Certificate Holder cannot follow the best management practices, the EM&CP shall provide justification and demonstrate that impacts have been avoided or minimized to the maximum extent practicable.

NG Response 92: *Appendix I to the Joint Proposal identified the occurrences of spotted turtle (*Clemmys guttata*) and wood turtle (*Glyptemys insculpta*), state-listed species of special concern, in proximity to the Project within Oswego County along with BMPs for conservation of these species of special concern. A Wood and Spotted Turtle Overwintering Habitat Assessment Report dated June 17, 2026 was prepared to identify potentially suitable overwintering habitat at the Project. A copy of this report is presented in Attachment D of Appendix S. Where potentially suitable overwintering habitat is present, BMPs similar to those implemented for Blanding's turtles, will be utilized to avoid and minimize impacts to potentially overwintering spotted and wood turtles during Project construction. Wood and spotted turtle BMPs to be utilized during construction a/k/a minimization monitoring plan as well as education and encounter plans are provided in Attachment D of Appendix S.*

CONDITION 93: For the avoidance of impacts to nesting sedge wrens, construction during the active season (April 23 and August 15) within grassland fields greater than 25 acres in size included within the area of the element occurrence, shall be conducted under the supervision of a bird monitor whose qualifications have been approved by DPS and NYSDEC staff. If a sedge wren nest is observed during construction activities, the protocol outlined in Certificate Condition 88 shall be followed. Bird monitors are not required if the area is currently in row crop or was in row crop for four of the last five years.

NG Response 93: *National Grid will comply. Sedge wren was documented in the vicinity of the Project in the Town of Clay. Based on consultation with the NYSDEC, a Grassland*

Breeding Bird Survey Report dated September 23, 2025 was prepared to investigate the presence and site use by New York threatened or endangered or special concern grassland breeding birds, including the sedge wren. A copy of this report is presented in Attachment B of Appendix S. No federally or state-threatened or endangered species including sedge wren were documented during the 2025 grassland breeding bird surveys. National Grid will have environmental inspectors or consultants available to act as bird monitors for construction during the active season (April 23 and August 15) within grassland fields greater than 25 acres in size included within the area of the element occurrence.

CONDITION 94: For the avoidance of impacts to nesting pied-billed grebes, construction within wetland areas of occupied habitat during the active season (April 15-August 15) shall be conducted under the supervision of a bird monitor whose qualifications have been approved by DPS and NYSDEC staff. If a pied-billed grebe nest is observed during construction activities, the protocol outlined in Certificate Condition 88 shall be followed.

NG Response 94: *National Grid will comply. Pied-billed grebe was documented in the vicinity of the Project in the Town of Orwell. Based on consultation with the NYSDEC, a Marsh Bird Survey Report dated September 23, 2025 was prepared to investigate six primary focal species, including pied-billed grebe. A copy of this report is presented in Attachment A of Appendix S. No federally or state-threatened or endangered species including pied-billed grebe were documented during the 2025 marsh bird surveys. National Grid will have environmental inspectors or consultants available to act as bird monitors for construction within wetland areas of occupied habitat during the active season (April 15-August 15).*

CONDITION 95: To avoid impacts to Blanding's turtle the Certificate Holder shall not conduct construction activities: (i) within any existing occupied habitat during the Blanding's turtle active season (April 1-October 31) or (ii) within any existing occupied habitat containing wetlands that are 30 cm or greater in depth year round. In the event that full avoidance of impacts outlined above, is not practicable, and construction must occur the Certificate Holder shall follow the protocol in Condition 96.

NG Response 95: *National Grid will comply. Per the NYSDEC's recommendation a Blanding's turtle habitat assessment was completed for the Project extents located within Jefferson County during the Blanding's turtle active season and concluded on October 24, 2024. Potentially suitable habitat was assessed, and the results of this field study are summarized in Attachment C of Appendix S. The Blanding's Turtle Habitat Assessment Report was provided to the NYSDEC on March 12, 2026. Based on the results of this assessment and Certificate Condition 95, National Grid will implement the BMPs outlined in Appendix S during construction and minimize potential impacts to this species and their habitat where potentially suitable habitat has been identified based on the results the habitat assessment. Construction personnel will be provided a copy of the Blanding's turtle BMPs and will be made aware of the potentially suitable habitat areas for this species within the Project extents. Additionally, a designated Blanding's turtle monitor will maintain a logbook to document any field observations of the Blanding's turtle*

species during construction. Any species encounters will be handled in accordance with Appendix S.

CONDITION 96: In the event that full avoidance of impacts to any individual T&E animal species or its habitat is impracticable, Certificate Holder shall propose a Minimization and Monitoring Plan as part of the corresponding EM&CP. At a minimum, this Plan shall detail: (1) why avoidance is impracticable; (2) proposed minimization measures; and (3) mitigation, as applicable. If NYSDEC determines and informs DPS Staff and the Certificate Holder that a take will occur, then Certificate Holder shall prepare a Net Conservation Benefit Plan (“NCBP”), which, in addition to the details set forth in the Minimization and Monitoring Plan, must also include any proposed mitigation with a discussion as to how a net conservation benefit will result to the impacted species. Said Plans shall be developed in consultation with and accepted by DPS Staff and NYSDEC. Any required NCBP must satisfy the requirements of 6 NYCRR Part 182 and shall be submitted within six months of completion of construction of the Project except as otherwise extended by the Secretary under Certificate Condition 5.

NG Response 96: *National Grid will comply.*

CONDITION 97: Should the Certificate Holder determine that blasting, helicopter, or drone use will be needed, an appropriate plan for such activity will be provided in the EM&CP consistent with the Specifications for the Development of Environmental Management and Construction Plan attached as Appendix E to the Certificate order (“Appendix E”). Each plan will detail avoidance and minimization measures for State and federally protected species during construction of the Project.

NG Response 97: *National Grid will comply.*

M. WATERBODIES AND WETLANDS

CONDITION 98. The Certificate Holder shall perform all construction activities in a manner that avoids, then minimizes to the extent practicable, any significant adverse environmental impacts to streams, waterbodies, wetlands, and the any regulated adjacent area (“Regulated Adjacent Area”). The Certificate Holder shall ensure the following provisions to protect wetlands, waterbodies, and Regulated Adjacent Areas are followed as specified in the EM&CP, as applicable:

- a) The Certificate Holder shall notify DPS Staff and NYSDEC within two (2) hours of observing or being made aware of a discharge to a wetland or waterbody resulting in a violation of New York State Water Quality Standards. In the event that construction results in an alteration (i.e., lowering) of wetland hydrology, then the breach shall be immediately sealed and no further activity shall take place until DPS Staff and NYSDEC staff are notified and a remediation plan to restore the wetland and prevent future dewatering of the wetland has been approved by DPS Staff in consultation with NYSDEC. For each such occurrence of discharge to a wetland or waterbody, the Certificate Holders shall as soon as practicable, but

within fourteen (14) calendar days, provide a follow-up report via email to DPS Staff and NYSDEC staff that includes a written description of the occurrence, photographs, and a summary of the corrective or remedial actions taken.

- b) Wetlands Regulated Adjacent Areas located within the Project ROW or crossed by the Project ROW or any off-Project ROW access road for the Project, shall be delineated in the field prior to construction in those areas and indicated in the approved EM&CP.
- c) Unless otherwise specified in the approved EM&CP, all work in protected streams (class C(T) or higher and/or navigable), as defined in 6 NYCRR Part 608.1(u) and Part 608.1(aa), is prohibited from September 15 through May 31 in cold water fisheries, and from March 15 through July 15 in warm water fisheries. The Certificate Holder shall consult with the NYSDEC during the development of the EM&CP to verify cold water and warm water fisheries that may be affected by the Project.
- d) Concrete washout areas shall be located a minimum of 100 feet away from any drainage swale, storm drain inlet, wetland or waterbody. If the minimum setback cannot be achieved, the approved EM&CP shall provide demonstrable justification that impacts to wetlands and waterbodies from concrete washout areas shall be avoided or minimized to the maximum extent practicable and, if appropriate, secondary containment measures will be installed.
- e) Unless otherwise specified in the EM&CP, construction vehicle access across protected streams and waterbodies (streams classified as C(T) or higher) shall be limited to existing or temporary bridges, culverts or crossings installed in accordance with the EM&CP.
- f) Where impacts to streams are unavoidable or otherwise approved, all work in regulated streams shall be conducted in the dry, using appropriate water handling measures to isolate work areas and direct stream flow around the work area, unless approved otherwise specified in the EM&CP.
- g) The Certificate Holder shall use measures to minimize soil compaction in wetlands and waterbodies, including the use of temporary matting, low-ground pressure equipment, and constructing when soils are frozen. The EM&CP shall include a plan to restore wetlands and waterbodies, including restoration of pre-construction site conditions and stabilization of disturbed wetlands and waterbodies. Such restoration should occur within 48 hours or as soon as practicable after final construction.
- h) Excavated soil material shall not be permanently stored in floodplains or within 100 feet of wetlands, streams or waterbodies; provided that if soil storage is required in wetlands, the soil is to be temporarily stored on construction mats and properly contained to prevent runoff.

- i) All excess fill materials and spoils shall be completely removed to upland areas greater than 100 feet from wetlands and waterbodies unless otherwise specified and justified in the approved EM&CP.
- j) Equipment shall not be washed in any stream, waterbody, wetland or Regulated Adjacent Area unless otherwise specified and justified in the EM&CP. No runoff resulting from washing operations shall directly enter into these areas. Equipment storage and stockpile areas shall be located outside of floodplains, unless otherwise specified in the approved EM&CP.
- k) Dewatering operations from any construction related activities must be discharged into an approved dewatering device (i.e., temporary sediment trap or filter bag) as detailed in the New York State Standards and Specifications for Erosion and Sediment Control ("Blue Book"). To the extent practicable, the dewatering device shall not be placed on or near the top of the bank of streams and shall be located a minimum of 50ft from all wetlands, streams, and waterbodies while remaining within the ROW. If discharge into a wetland or waterbody is necessary, the Certificate Holder must provide reasonable justification and appropriate mitigation for any unavoidable impacts, which must be established through consultation with NYSDEC and DPS. Return water from dewatering activities shall not be contaminated, as defined in NYSDEC regulations and guidance, and shall not cause a substantial visual contrast to natural conditions of any wetland or stream.
- l) There shall be no substantial increase in visible contrast in water clarity due to discharges from construction activities between upstream reaches of work areas and downstream reaches of work areas.
- m) Disturbed streams shall be restored to equal width, depth, gradient, length and character as the pre-existing stream channel and tie in smoothly to the profile of the stream channel upstream and downstream of the disturbance. All disturbed stream banks shall be mulched within two (2) days of final grading, stabilized with 100% natural/biodegradable fiber matting, and revegetated with an appropriate riparian plant species or seed mix specified in the approved EM&CP. In areas where vegetation has been uprooted or grubbed on stream banks, the vegetation shall be replaced with ROW compatible native plantings as site conditions and facility design allow, as appropriate and consistent with the use of the Facility. A minimum of 50 feet from the bed and banks (as defined in 6 NYCRR Part 608 of the DEC regulations) of DEC jurisdictional streams will be stabilized using natural or 100% biodegradable materials, mulched, and seeded. Photodegradable and synthetic materials including but not limited to polypropylene, nylon, polyethylene, and polyester are prohibited from use.
- n) No portion of a marshalling yard and staging area constructed on previously undisturbed lands shall be sited within floodplains, wetlands, state regulated wetland adjacent areas, or within fifty feet of waterbodies or streams.

- o) Construction through wetlands shall be done with low-ground pressure equipment or on temporary mats or geotextile/gravel access roads and shall be restricted to access roads and work areas set forth in the EM&CP. In the event that temporary matting will be placed in wetlands, those mats will be removed, and wetlands hydrology soils and vegetation will be restored to the extent practicable. Where new permanent access roads are to be constructed through wetlands, geotextile fabric or equivalent underlayment shall be used.
- p) Bridges shall be installed wherever a new permanent crossing is required for protected streams. The bridge shall span the bed and banks of the stream. If a bridge is not practicable, the EM&CP shall provide justification for a non-bridge crossing, or if the installation of a bridge would require major reconfiguration of the stream channel and banks, the permanent culvert shall be designed in accordance with the approved EM&CP
- q) When installation of a bridge to span a protected stream is either not practicable or would require major reconfiguration of the stream channel and banks, as justified by the approved EM&CP, and a culvert is the only practicable option, it shall be designed in accordance with the approved EM&CP as follows:
 - i. To safely pass the 1% annual (100-year return) chance storm event;
 - ii. To contain native streambed substrate or equivalent using an open bottom arch, three-sided box culvert, or round/elliptical culvert with at least 20% of the culvert height embedded beneath the existing grade of the stream channel at the downstream invert;
 - iii. Shall be a minimum width of 1.25 times the width of the stream bank full width;
 - iv. The slope shall remain consistent with the slope of the pre-existing channel (upstream and downstream). For slopes greater than 3%, an open bottom culvert shall be used, where practicable; and
 - v. Shall facilitate downstream and upstream passage of aquatic organisms.
- r) Temporary stream crossings. Any temporary stream crossing shall facilitate downstream and upstream passage of aquatic organisms.
 - i. Bridges. Temporary bridges should be installed without causing damage to the stream bed or banks. Fill may not be placed within the stream channel below top of bank elevation and placement of abutments or fill is authorized only above and outside top of bank boundaries, unless otherwise approved in the EM&CP.

- ii. Culverts. Temporary culverts should be appropriately sized to handle a ten-year design storm. Temporary culverts shall not be left in place for more than one hundred and eighty (180) calendar days unless otherwise approved in the EM&CP. For any installation of temporary culverts for more than 180 days proposed in the EM&CP, the Certificate Holder shall include a description of mitigation measures, if required, based on consultations with DPS Staff and NYSDEC.
- s) Non-invasive vegetation cut in wetlands areas may be left in place (drop and lop) or removed from wetlands to upland areas. Cut vegetation shall not be permanently piled in the wetland areas.
- t) If access roads or work pads in wetlands cannot be avoided, they shall be constructed with temporary construction mats, or with tracked equipment in dry or frozen conditions, in consultation with DPS and NYSDEC Staff. Such locations shall be as set forth on the EM&CP drawings; provided, however, if geotextile/gravel access roads are proposed, such proposal shall be justified in the EM&CP.

NG Response 98: *National Grid will comply. The EM&CP was developed to minimize impacts to waterbodies and wetlands. Measures to minimize disturbance and protect wetlands will be implemented throughout all parts of the Project.*

As part of the EM&CP preparation, all wetland resources, streams, and waterbodies, both on and off ROW that could be impacted by the Project, were delineated (flagged) in the field and identified on the EM&CP Plan and Profile Drawings (see Appendix A). All wetlands, streams and waterbodies will be reflagged prior to the start of construction to help ensure their protection.

A variety of wet meadows, marshes, scrub-shrub wetlands, and forested wetlands associated with rivers, perennial and intermittent streams, and depressions occur within and adjacent to the Project ROW. These consist of cover type components of palustrine emergent ("PEM"), palustrine scrub-shrub ("PSS"), and palustrine forested ("PFO") wetlands. Some of these wetlands are associated with mapped NYSDEC freshwater wetlands and thus are regulated under the NYS Freshwater Wetlands Act and its implementing regulations. Some of these wetlands are associated with mapped wetlands in the USFWS NWI dataset and depending on their hydrologic connection to Waters of the United States ("WOTUS"), may or may not be regulated by the USACE under the Navigable Waters Protection Rule which was revised in 2023 and Sections 401 and 404 of the Clean Water Act.

Field delineations were conducted within the transmission line corridor from June through December 2023. Field delineation of off-ROW access routes and marshaling yards were completed during several mobilizations between September 2024 and May 2026. The delineation efforts resulted in the identification of 359 wetlands within the Project ROW totaling 355 acres, 17 wetlands in the proposed marshaling yards and 33 wetlands along

proposed off-ROW access routes. The wetlands consisted of one (1) or more of the following cover types: palustrine emergent (PEM), palustrine scrub-shrub (PSS), palustrine forested (PFO), and palustrine unconsolidated bottom (PUB).

Based on the field and desktop observations, all wetlands presumed USACE jurisdictional under Section 404 of the Clean Water Act connect to WOTUS. Approximately 164 wetlands coincide with NYSDEC wetlands and fall under state jurisdiction pursuant to Article 24 of the ECL. Wetlands were also deemed NYSDEC jurisdictional if they meet the definitions described in 6 NYCRR Part 664 (under the 2025 NYSDEC wetland regulations).

On April 8, 2026, the Albany County Supreme Court issued a decision annulling the NYSDEC's 2025 Freshwater Regulations (6 NYCRR Part 664). Based on this court decision, National Grid will be re-evaluating wetlands previously determined to be NYSDEC jurisdictional and will be submitting an updated JD request to the NYSDEC in August 2026.

Best Management Practices (BMPs) such as the installation of erosion and sediment control devices to prevent the introduction of sediment into aquatic resources will be carried out from the beginning to the end of construction in accordance with the approved SWPPP provided in Appendix G. All erosion and sediment control devices prescribed by the SWPPP are shown on the EM&CP Plan and Profile Drawings. Upon the completion of construction, all disturbed areas will be restored and seeded and mulched with a conservation seed mix to restore bank stability, habitat and vegetative cover. SWPPP inspections will take place twice every seven days until construction is completed and all disturbed areas have been stabilized and will then continue every 30 days until all disturbed areas have achieved 80% vegetative cover

National Grid will submit a pre-construction notification and application package for authorization to proceed under a Nationwide Permit to the USACE. A conceptual wetland mitigation plan will also be submitted. After consultation with the USACE, National Grid assumes that wetland credits will be purchased to satisfy the USACE wetland mitigation requirements. National Grid is currently working with the DPS staff and the NYSDEC to prepare an acceptable on-site wetland mitigation plan to satisfy the NYSDEC wetland mitigation requirements. More information regarding the wetland mitigation plan can be found in National Grid's response III.C.7.

CONDITION 99. Disturbed wetlands, and regulated wetland adjacent areas, shall be (i) immediately stabilized and (ii) restored to pre-construction contours as soon as practicable. Immediately upon completion of grading, and as consistent with existing land uses, the area shall be seeded with a seed mix of native plants specified in the approved EM&CP that is appropriate for such areas. Overall vegetative cover shall consist of the plants with appropriate wetland indicator status over all portions of the restored area. Notification shall be provided to NYSDEC and DPS once 80% cover has been achieved. If 80% cover of plants with the appropriate wetland indicator status has not been achieved at the end of the second growing season of monitoring, the Certificate Holders shall

consult with NYSDEC and DPS and prepare a Wetland Planting Remedial Plan (“WPRP”) in accordance with the approved EM&CP and shall submit a minor change notice to DPS Staff in accordance with the procedures set forth in Condition 30(a). Once approved by DPS Staff, in consultation with NYSDEC, the change shall be implemented according to the approved schedule.

NG Response 99: *National Grid will comply. See Response to Condition 98.*

CONDITION 100. The Certificate Holder shall work with NYSDEC to develop a Wetland Mitigation Plan, if necessary, following the specifications set forth in Appendix E to the Joint Proposal and will submit the Plan within six months of the start of construction for DPS Staff and NYSDEC acceptance, subject to the Commission’s continuing jurisdiction as appropriate.

NG Response 100: *National Grid will comply. The Wetland Mitigation Plan is contained in Appendix R.*

CONDITION 101. The Certificate Holder shall take all necessary precautions to preclude contamination of any wetland or waterway by suspended solids, sediments, fuels, solvents, lubricants, epoxy coatings, paints, concrete, leachate, or any other environmentally deleterious materials associated with the Project.

NG Response 101: *National Grid will comply. In complying with the guidelines set forth within this Certificate and industry best practices, including but not limited to utilizing appropriate erosion and sediment control and appropriate spill control measures, National Grid intends to minimize its impact on contamination of wetlands and waterways.*

Further detail on precautions to be taken can be found in Response III.A.3, III.C.5, and III.C.8 of this document as well as the plan and profile drawings shown in Appendix A, the SWPPP found in Appendix G and spill procedures contained in Appendix V.

CONDITION 102. The Certificate Holder shall inform the USACE of any changes in the design of the Project that have the potential to impact any USACE-issued permit or authorization and shall file a copy of such correspondence with the Secretary.

NG Response 102: *National Grid will comply.*

N. PETROLEUM AND HAZARDOUS SUBSTANCES

CONDITION 103. The Certificate Holder shall notify NYSDEC and the fire department and emergency services organization having jurisdiction over the location of such spill of any fuel or chemical spill it is required to report in accordance with NYSDEC regulations and guidance, and it shall notify DPS Staff thereafter, as soon as practicable but not to exceed two hours thereafter.

NG Response 103: *National Grid will comply. A copy of National Grid's spill reporting and cleanup procedures are provided in Appendix V.*

CONDITION 104. The EM&CP shall include Fuel and Chemical Handling Procedures, and a spill response and route emergency plan, including the NYSDEC spill reporting contact number and the Certificate's reporting requirements. This plan shall provide proposed methods of handling spills of petroleum products and any hazardous or controlled substance which may be stored or utilized during construction, operation, or maintenance of the Project.

NG Response 104: *National Grid will comply. National Grid and its contractors will implement precautions during the storage, handling and transportation of fuels, oils, chemicals, and other potentially harmful substances to avoid spills and releases to the environment. National Grid and its contractors will take precautions to prevent spillage and will not store, mix, or load these materials beneath trees or in proximity to any wetlands, river, stream, or other body of water. Any hazardous substances will be transported, stored, and handled as recommended by suppliers and/or manufacturers and in compliance with all applicable federal or state regulations. Specific procedures for the handling of petroleum and chemicals are put forth in Response III.B.4 within Section III.B of this EM&CP.*

Typical chemicals and waste anticipated for the Project are identified in Table V-1 in Appendix V along with copies of National Grid's spill reporting and clean up procedures. A list of emergency contact personnel and area hospitals and a map showing the location of the nearest hospitals are provided in Appendix K.

CONDITION 105. All Certificate Holder and Contractor vehicles working on the Project shall have a spill kit that is appropriate for the volume of fuel carried by the vehicle.

NG Response 105: *National Grid will comply.*

CONDITION 106. The Certificate Holder's Contractor will retain a qualified spill response company for the duration of the Project and provide that company with maps showing access roads, marshalling yards, and other information that will facilitate response to a spill location.

NG Response 106: *National Grid will comply.*

CONDITION 107. Equipment refueling, maintenance, and repair shall be conducted a minimum of 100 feet away from any wetland or waterbody to the maximum extent practicable, unless otherwise specified in the EM&CP, which shall specify protective measures against spills.

NG Response 107: *National Grid will comply.*

CONDITION 108. Fuel tanks with storage capacities under 1,100 gallons and chemical storage shall be a minimum of 100 feet from any wetlands and waterbodies and shall include adequate secondary containment (containing at least 110% of the volume stored). Where possible from a constructability standpoint, fuel tanks with storage capacities under 1,100 gallons and chemical storage will be located farther than 100 feet from any wetlands or waterbodies. Fuel tanks with storage capacity over 1,100 gallons shall comply with the minimum setbacks under applicable regulations. If the minimum setback cannot be achieved, the approved EM&CP shall provide justification and demonstrate that impacts have been avoided or minimized to the maximum extent practicable.

NG Response 108: *National Grid will comply.*

CONDITION 109: If and when the Certificate Holder places an order with a supplier for Gas-insulated equipment (“GIE”) for the Project (“Project GIE”), the Certificate Holder shall comply with all applicable laws, regulations, and guidance relating to SF6 then in effect, which is currently 6 NYCRR Part 495. To the extent the installation of SF6 in GIE is prohibited by applicable law or regulation that comes into effect before the GIE is placed in service, the Certificate Holder may avail itself of any applicable exception, variance, or grandfathering provision provided for in such law or regulation relating to SF6 in GIE.

NG Response 109: *National Grid will comply.*

O. AGRICULTURAL RESOURCES

CONDITION 110. The Certificate Holder shall comply with the below guidelines for the Project ROW:

- a) The Certificate Holder shall retain a qualified agricultural inspector for each phase of Project development, including design, construction, initial restoration, post-construction monitoring and follow-up restoration. The agricultural inspector shall be available to provide site-specific agricultural information as necessary for EM&CP development through field review, as well as to have direct contact with affected farm operators, County Soil and Water Conservation Districts, NYSAGM and others. The requirement to have an agricultural inspector may be satisfied, if such individual qualified, by the environmental inspector, required under Condition 61. The agricultural inspector (if different from the environmental inspector) shall maintain regular contact with the environmental inspector and/or the construction inspector throughout the construction phase. This inspector also shall maintain regular contact with the affected farmers and County Soil and Water Conservation Districts concerning farm resources and management matters pertinent to the agricultural operations and the site-specific implementation of the EM&CP. Whenever the Certificate Holder submits a request for an EM&CP change concerning agriculture, it shall consult with NYSAGM.
- b) As part of the line-location surveys conducted during the preparation of the EM&CP, the Certificate Holder shall locate all commercial sugarbushes

maintained for maple syrup production within the ROW. The Certificate Holder shall attempt to adjust the centerline location within the ROW to avoid such operations.

- c) The Certificate Holder shall design the Project to the extent possible to avoid or limit the placement of structures on crop fields or on other active agricultural land where the structures may significantly interfere with normal agricultural operations or activities. Where the location of a structure on such agricultural land is unavoidable, the Certificate Holder shall attempt to site the structure in a location that minimizes impact to mechanized farming.
- d) During preparation of the EM&CP, a detailed drainage line repair procedure shall be developed, in consultation with NYSAGM, for the repair of crushed/severed clay tile and plastic drain lines. Drawings showing the generic technique to be implemented for drain line repairs shall be provided by the Certificate Holder. All new plastic drain tubing shall meet or exceed the American Association of State Highway Transportation Officials ("AASHTO") M252 specifications. The plan for the replacement of functional stone drainage systems severed during construction shall be prepared during the restoration phase, in consultation with NYSAGM, the County Soil & Water Conservation District and USDA-NRCS.
- e) Where construction entrances are required from public roadways to the ROW in agricultural fields, an underlayment of durable, geotextile fabric shall be placed over the exposed subsoil surface prior to the use of temporary gravel access fill material. Complete removal of the construction entrance upon completion of the Project and restoration of the affected site is required prior to topsoil replacement, except where retention of the construction entrance would be more conducive to the existing land use than removal, and is agreeable to the agricultural landowner.
- f) Segments of existing farm roads utilized for access shall be improved as required following consultation with the farm operator and NYSAGM prior to use. Such improvements shall include the installation of geotextile fabric and crushed stone.
- g) Farm drainage features, fences and gates affected by construction shall be rebuilt to like new condition upon completion of construction. The base of all new posts shall be secured to a reasonable depth below the surface to prevent frost heave.
- h) Mats may be installed as an alternative to topsoil stripping. If so, the mats shall be layered where necessary to provide a level access surface. Once access is no longer required across agricultural areas, the mats shall be removed and the agricultural inspector shall use a soil penetrometer to determine if soil compaction has occurred as a result of construction activities. All compacted areas shall be remediated as specified below.
- i) Where the installation of mats is not practical, such as access roads, work pads associated with pole structures, wire pulling sites, the topsoil shall be removed,

including all of the “A” horizon down to the beginning of the subsoil “B” horizon, generally not to exceed a maximum of 12 inches. Topsoil removal up to a depth of 16 inches may be required in specially designated soils encountered along the route and identified in the EM&CP. All topsoil shall be stockpiled directly adjacent to the travel way on the ROW and separated from other excavated materials. The agricultural inspector shall determine depth of topsoil stripping on each affected farm by means of the County Soil Survey and on-site soil augering, if necessary. All topsoil material shall be stripped, stockpiled, and uniformly returned to restore the original soil profile. During the clearing/construction phase, site specific depths of topsoil stripping shall be monitored by the agricultural inspector. Once topsoil stockpiles have been created they shall be marked in the field.

- j) If blasting is required in agricultural areas of till over bedrock, the blasting plan in the EM&CP shall require that: the Certificate Holder use matting or controlled blasting to limit the dispersion of blast rock fragments; all blasted rock not used as backfill shall be removed from croplands, haylands and improved pastures; the till and topsoil shall be returned in natural sequence to restore the soil profile; and the Certificate Holder give farm owners/operators timely notice prior to blasting on farm property.
- k) During the restoration phase of the Project, the Certificate holder shall remove the crushed stone and geotextile fabric, except at the landowner’s written preference. In all agricultural sections of the ROW disturbed during construction, the Certificate Holder shall break up the subsoil compaction with deep tillage by such devices as a deep-ripper (subsoiler). Soil compaction results should be no more than 250 pounds per square inch (“PSI”) as measured with a soil penetrometer. Following the deep ripping (with tractor drawn farming equipment), all stone and rock material 4 inches and larger in size which has been lifted to the surface shall be collected and taken off site for disposal. The topsoil that has been temporarily removed for the period of construction shall then be replaced. Finally, deep subsoil shattering shall be performed, if the decompaction requirements are not met, with a subsoiler tool having angled legs. Stone removal shall be completed, as necessary, to eliminate any additional rocks and stones brought to the surface as a result of the final subsoil shattering process. In the event that subsequent construction or clean-up activities result in additional compaction, additional deep tillage should be performed to alleviate such compaction.
- l) Soil compaction should be tested using an appropriate soil penetrometer or other soil compaction measuring device. Compaction tests will be made for each soil type identified on the affected agricultural fields. The soil compaction test results within the affected area will be compared with those of the adjacent unaffected portion of the farm field/soil unit. Where representative subsoil density of the affected area exceeds the representative soil density of the unaffected areas, additional shattering of the soil profile will be performed using the appropriate equipment. Deep shattering will be applied during periods of relatively low soil moisture to ensure the desired mitigation and to prevent additional soil compaction.

Oversized stone/rock material which is uplifted to the surface as a result of the deep shattering will be removed.

- m) After topsoil replacement and seedbed preparation, apply seed and soil amendments in accordance with the recommendations contained in NYSAGM's combined guidance entitled Construction Mitigation for Projects on Agricultural Lands (initially published July 2025) or as specified by the landowner.
- n) All structures and guy anchors removed from agricultural areas as part of the construction activities should be removed to a minimum depth of 48 inches below the soil surface. All holes or cavities created by the removal of the old facilities shall be filled to the same level as the adjacent area, plus 6 to 12 inches of additional soil to allow for settling. All material will be slightly mounded to accommodate for settling.
- o) Wherever existing structures are removed from agricultural fields, the immediate area will be restored to be compatible with agricultural production. Such restoration should include the removal of concrete foundations and steel structures down to a minimum of 48" below the ground surface, the removal of all vegetation from the structure area, and grading of the ground surface to match the adjacent field. All rocks 4 inches and greater in size shall be removed from the surface.
- p) At the end of all construction, the ROW and respective work areas, including guying wire assembly and disassembly sites, shall be thoroughly cleared of debris such as nuts, bolts, spikes, wire, pieces of steel, and other assorted items.
- q) The Certificate Holder shall provide a monitoring and remediation period of two growing seasons following completion of ROW restoration in active agricultural areas. The Certificate Holder shall retain the services of an agricultural inspector on at least a part-time basis through this period. The monitoring and remediation phase shall be used to identify any remaining agricultural impacts associated with ROW construction that are in need of mitigation and to implement the follow-up restoration.
- r) During the monitoring and remediation period, on site monitoring shall be conducted at least three (3) times during each growing season and shall include a comparison of growth and yield for crops on and off the ROW. When the subsequent crop productivity within the affected ROW is less than that of the adjacent unaffected agricultural land, the agricultural inspector, in conjunction with the Certificate Holder and other appropriate organizations, shall help to determine the appropriate rehabilitation measures for the Certificate Holder to implement (soil de-compaction, topsoil replacement, etc.). During the various stages of the Project, all affected farm operators shall be periodically apprised of the duration of remediation by the agricultural inspector. Because conditions which require remediation may not be noticeable at or shortly after the completion of construction, the end of the remediation period shall not obviate the Certificate

Holder's responsibility to fully redress all Project impacts, and the Certificate Holder shall continue to respond to the reasonable requests of the farmland owner/operators to correct Project related effects on the impacted agricultural resources after completion of the specific remediation period.

- s) The Certificate Holder shall provide all farm owners/operators with a telephone number to facilitate direct contact with the Certificate Holder and the agricultural inspector(s) through all of the stages of the Project. The farm owner/operators shall also be provided with a telephone number to facilitate direct contact with the Certificate Holder's Project Manager (or other representative of the Certificate Holder) for the Project during operation and maintenance of the transmission line.
- t) The agricultural inspector shall work with the farm operators during the planning phase to develop a plan to delay the pasturing of the ROW, following construction until pasture areas are adequately revegetated. The Certificate Holder shall be responsible for maintaining the temporary fencing on the ROW until the agricultural inspector determines that the vegetation on the ROW is established and able to accommodate grazing. At such time, the Certificate Holder shall be responsible for removal of the fences.
- u) On affected farmland, restoration practices shall be postponed until favorable (workable, relatively dry) topsoil/subsoil conditions exist. Restoration shall not be conducted while soils are in a wet or plastic state. Stockpiled topsoil shall not be regraded until plasticity, as determined by the Atterberg field test, is significantly reduced. No Project restoration activities shall occur in agricultural fields between the months of October through May unless favorable soil moisture conditions exist. The Certificate Holder shall monitor and advise NYSAGM and DPS Staff regarding tentative restoration planning. Potential schedules will be determined by conducting the Atterberg field test at appropriate depths into topsoil stockpiles, and below the traffic zone for a mutual determination of adequate field conditions for the restoration phase of the Project.
- v) Topsoil stockpiles on agricultural areas left in place prior to October 31 shall be seeded with Aroostook Winter Rye or equivalent at an application rate of 3 bushels (168 #) per acre and mulched with straw mulch at rate of 2 to 3 bales per 1000 sq. ft. Topsoil stockpiles left in place between October 31 and May 31 shall be mulched with straw mulch at a rate of 2 to 3 bales per 1000 sq. ft. Straw (not hay) mulch shall be used to prevent soil loss on stockpiled topsoil from October through May.

NG Response 110(a): *The Project ROW crosses Jefferson County Agricultural District 1, Onondaga County Agricultural District 3, and Oswego County Agricultural District 11. The Project is adjacent to and traverse active agricultural lands. During construction, agricultural operations within the ROW may be disrupted for one growing season, depending on the timing and duration of construction. If possible, structure removal and replacement will be timed for drier or frozen periods of the year to minimize rutting. If temporary construction mat access is not practicable or desirable, topsoil may be stripped*

and stockpiled from work areas within crop fields and then replaced following the completion of work. Should soil rutting occur, areas will be graded and restored to the farm operator's satisfaction

Agricultural fields are identified on the EM&CP Plan and Profile drawings in Appendix A and agricultural districts are identified in Appendix D.

National Grid will make every effort to coordinate construction activities with ongoing farming activities in order to minimize disruption and crop damage and will ensure that construction, initial restoration, post-construction monitoring and follow-up restoration is in accordance with all conditions of the Commission Order. In addition, prior to submitting a request for change, the Environmental Monitor will consult with the New York State Department of Agriculture and Markets ("NYSAGM") regarding any change to the approved EM&CP that might affect agricultural lands.

NG Response 110(b): *The Project does not cross any commercial sugarbushes within the Project ROW. However, three small-scale sugarbushes were identified within the ROW and are identified on the EM&CP Plan and Profile drawings in Appendix A.*

NG Response 110(c): *During the development of the EM&CP there were no commercial sugarbushes identified within the Project ROW.*

NG Responses 110(d), (e), (g), (h), (j), (o), (p), (q), (r), (s), (u), (v), and (w): *National Grid will comply.*

NG Response 110(f): *National Grid will comply. When working areas of active agriculture, the Agricultural Inspector will consult with the relevant farm owner or operator to determine if plans or recommendations exist for the future installation of drainage improvements in these areas. If so, construction and restoration activities will be conducted to accommodate the future plans.*

During construction, the Agricultural Inspector will mark any exposed or damaged tiles that are observed and repairs will be made in accordance with the typical drawings for drain tile repairs that are included in Appendix AC. If required, a site-specific plan will be prepared in consultation with the affected farm owner or operator, NYSAGM and the local Soil and Water Conservation District.

Plans for the replacement of any functional stone drainage systems that are damaged during construction will be prepared in consultation with the affected farm owner or operator, NYSAGM and the local Soil and Water Conservation District.

NG Response 110(i), (l), and (m): *National Grid will comply. All compacted areas will be restored as specified in Certificate Condition 110(l), and as described in Section III.A. and III.B.4.*

NG Response 110(k): *No blasting is anticipated at this time. National Grid will comply with this Certificate Condition and will provide timely notification if blasting becomes necessary.*

NG Response 110(n): *National Grid will comply. A copy of NYSAGM's most recent guidance, dated July 2025, Construction Mitigation for Projects on Agricultural Land, is provided in Appendix T.*

NG Response 110(t): *National Grid will comply. Contact numbers are provided in Appendix K of this EM&CP document for any inquiries during the timeframe of this Project. All farm owners/operators will also be provided with a post construction contact number for concerns during the future operation and maintenance of the transmission line.*

P. CONTRACTORS AND CONTRACTOR SUPPLIES/MATERIALS

CONDITION 111. If an OSHA Recordable accident occurs in connection with work on the Project, the Certificate Holder shall report any such accident to DPS Staff and, if necessary, the local emergency services organization as soon as possible. A copy of the accident report shall be provided to DPS Staff after it has been finalized.

NG Response 111: *National Grid will comply.*

CONDITION 112. The Certificate Holder shall conduct a field review to determine compliance with its design on a monthly basis and prepare a written report of the Company's findings on whether the Project is being constructed in accordance with the EM&CP design for the Project. The Certificate Holder shall provide a copy of each such report to DPS Staff within three (3) business days after the Certificate Holder receives the report. The Certificate Holder shall notify DPS Staff of when the field reviews will occur.

NG Response 112: *National Grid will comply.*

CONDITION 113. To better ensure a safe working environment for all persons at each Project work site, the Certificate Holder shall require its contractors or subcontractors, before any person who is authorized by the Certificate Holder to be present at the site that day, or any representative of a regulatory agency present on official business, commences performing or observing Project activities, to give such person an on-site tailboard safety briefing. The Certificate Holder shall ensure that: (a) any document that a person participating in tailboard safety briefing is required to sign at such briefing is legible; and (b) the person conducting the briefing shall use their best efforts to give accurate and complete responses to all requests by such persons for clarification of the scope of work, construction methodology, and other pertinent personal safety information. If a person participating in a tailboard safety briefing who signed such a document desires a copy thereof, they shall request it in writing and the Certificate Holder shall provide a copy thereof to the requester within 48 hours of the request. Such requirement shall not apply to Emergency Services personnel present at the site in performance of their official duties.

NG Response 113: National Grid will comply.

CONDITION 114. The Certificate Holder's employees, contractors and subcontractors assigned to the construction of the Project and inspection of such construction work shall be properly trained in their respective responsibilities. To ensure proper training related to safety rules and regulations, the Certificate Holder shall hold a site-specific documented tailboard meeting for site inspectors prior to entry onto the site for work on the Project. Separate training sessions are required for each job site. The Certificate Holder must ensure that: (a) the person conducting the briefing shall use their best efforts to give accurate and complete responses to all requests by such persons for clarification of the scope of work, construction methodology, and other pertinent personal safety information; (b) any document that a person participating in tailboard safety briefing is required to sign at such briefing is legible; (c) all necessary safety information is interpreted for non-English speaking and reading-impaired employees; and (d) that if a person participating in a tailboard safety briefing who signed such a document desires a copy thereof, they shall request it in writing and the Certificate Holder shall provide a copy thereof to the requester within 48 hours of the request. Such requirement shall not apply to Emergency Services personnel present at the site in the performance of their official duties.

NG Response 114: National Grid will comply.

CONDITION 115. The Certificate Holder shall provide DPS Staff with a copy of any police report and any insurance claim filed in connection with any theft of Project-related materials, as well as a list of stolen items. Subsequently, the Certificate Holder shall provide DPS Staff with an accounting of all replacement materials. The Certificate Holder's accounting of replacement materials shall include documentation of the insurance company's coverage and the contractor's cost for replacement.

NG Response 115: National Grid will comply.

CONDITION 116. If a Contractor installs materials, structures, or components that do not conform to those specified in the EM&CP, the Certificate Holder, after becoming aware of such incident, shall prepare and deliver to the Chief of EC&C a summary report detailing the incident and the steps to be taken to rectify the mistake, the material and labor costs associated with rectifying the incident, and the manner in which such costs will be accounted for separately from other Project costs.

NG Response 116: National Grid will comply.

CONDITION 117. The Certificate Holder shall develop a quality control plan ("Quality Control Plan") for the Project to be included in the EM&CP describing how it will ensure that the other components it purchases for the Project conform to the specification for such components described in the EM&CP. At a minimum, the Quality Control Plan shall include:

- a) the name(s) and qualifications of the individual(s) who will conduct audits under the Quality Control Plan (“Quality Control Audits”); and
- b) the frequency with which the Quality Control Audits will be performed.

NG Response 117: *National Grid will comply. National Grid has developed a Quality Control Plan which is provided in Appendix U.*

Q. INVASIVE SPECIES

CONDITION 118. The Certificate Holder shall prepare an Invasive Species Management Plan in accordance with Appendix E to the Joint Proposal and in consultation with and accepted by DPS Staff and NYSDEC. The Certificate Holder shall provide said Invasive Species Management Plan as part of the approved EM&CP.

NG Response 118: *National Grid will comply. National Grid performed an initial survey of wetland and upland areas in the Project ROW, access roads, existing and potential substations, and potential reroutes for the presence and abundance of invasive species listed on the NYSDEC Interim List of Invasive Species. It is anticipated that good construction practices such as ensuring that all equipment, tools, and materials are clean before entering and upon exiting the Project ROW will prevent the spread of invasive species to surrounding areas as a result of construction activities. National Grid has adopted and implemented the Environmental Energy Alliance of New York’s (EEANY) “New York Utility Company Best Management Practices for Preventing the Transportation of Invasive Plant Species,” a copy of which is included in Appendix M.*

R. WATER QUALITY CERTIFICATION

CONDITION 119. To obtain a Water Quality Certification from the Commission in connection with its application(s) for permit(s) under Section 404 of the Federal Water Pollution Control Act authorizing construction work in federal-jurisdictional waters and wetlands, the Certificate Holder shall comply with applicable federal and state regulations and complete any then applicable forms and preapplication requirements for submittal to the Commission and the Chief of Transmission Siting, their equivalent, or their designee, pursuant to Section 401 of the Federal Water Pollution Control Act.

NG Response 119: *National Grid acknowledges this Certificate Condition. No response is required.*

III. SPECIFICATIONS FOR THE DEVELOPMENT OF ENVIRONMENTAL MANAGEMENT & CONSTRUCTION PLAN

1. Section A of the Environmental Management and Construction Plan (EM&CP) shall include a narrative addressing the location of the route, description and statement of objectives, techniques, procedures, requirements, and impacts avoidance,

minimization, and mitigation. A table of contents will be included for the EM&CP and each section, appendix or exhibit containing ten or more pages.

2. Section B of the EM&CP shall include the project's plans and profiles, details, sections and design drawings, and maps. Each drawing or figure shall be clearly titled, numbered, and dated to its version. Department of Public Service (DPS) Staff will be provided access to drawings maintained in a construction management database by the Certificate Holder. All final design drawings and figures are to be stamped and signed by a Professional Engineer.

3. Section C of the EM&CP shall include additional plans and appendices required by the Certificate or otherwise proposed by the Certificate Holder.

4. If any particular requirement of the EM&CP requirements is not applicable, not provided, inconsistent with the conditions of the Certificate, or otherwise not addressed, so indicate and include supporting justification.

A. DESCRIPTION AND STATEMENT OF OBJECTIVES, TECHNIQUES, PROCEDURES AND REQUIREMENTS

Section A of the EM&CP shall include a narrative addressing the location of the route; description and statement of objectives, techniques, procedures and requirements; and impacts avoidance, minimization, and mitigation. A table of contents will be included for the EM&CP, as well as each section, appendix or exhibit containing ten or more pages. The textual portion of the EM&CP shall include, but need not be limited to, all of the following information:

1. Facility Location and Description

- i. Describe the location and limits of the project's Temporary ROW, Limits of Disturbance (LOD), and Permanent ROW, and explain the need for any additional property or access rights. Describe how the final facility design and location addresses any concerns raised by any Federal, State, or local agencies, and other stakeholders. Provide a rationale for the inclusion of any mid-span splice locations proposed.

NG Response III.A.1: Section IA and IB of this EM&CP document provides a description of the location of the Project and the various Project components. Appendix A provides the EM&CP Drawings which show the location and limits of the Project ROW which is a combination of fee and easement holdings as well as facility locations and areas where additional permanent or temporary rights are required. The table in Appendix B identifies the property rights that are to be acquired for the Project. New easements of the following types will be required as necessary:

Operational (Gross) Easement: The perpetual right, privilege and easement to construct, reconstruct, relocate, extend, repair, maintain, operate, inspect, patrol,

and, at its pleasure, abandon or remove underground electric facilities including a line or lines of wires or cables (either direct-buried or installed in underground conduits), handholes, manholes, conduit, vaults, junction boxes, pad-mount transformers, housings, connectors, switches and switching equipment, pipes, pedestals, closures, ducts and duct work, markers, cables, connections to overhead and underground wires, any poles or lines of poles, supporting structures, cables, crossarms, overhead and underground wires, guys, guy stubs, insulators, transformers, braces, fittings, foundations, anchors, lateral service lines, communications facilities, and other fixtures and appurtenances, with rights for ingress and egress, clearing and trimming.

Railroad, pipeline, and other overhead utility Encroachment Agreements: *The conditional rights necessary to install, occupy, operate, access, and maintain the Project facilities upon and under railroad, petroleum pipeline, and other overhead utility in accordance with the Project design plans and specifications as approved by the entities, and with all applicable requirements and provisions.*

Additional ROW in the form of Operational (Gross) Easements will be required as described in Appendix B.

2. Vegetation Clearing and Disposal Methods

- i. Describe the methods and rationale for the type and manner of cutting and disposition or disposal methods and locations for cut vegetation.
- ii. Detail measures that will be employed to avoid damage to desirable vegetation, rare, threatened and endangered (RTE) species, important screening trees, and hedgerows.
- iii. Describe any landowner agreements for retention of timber or other cut vegetation.
- iv. Describe methods of compliance with 6 NYCRR Part 192 – Forest Insect and Disease Control, applicable New York State Department of Environmental Conservation (NYSDEC) quarantine orders, and New York State Department of Agriculture and Markets (NYSAGM) regulations.

NG Response III.A.2.i: *All areas that require trimming, clearing or mowing of vegetation as well as the prescribed slash disposal types are shown on the EM&CP Drawings in Appendix A. In general, the right-of-way will be cleared fifty feet (50') on each side of the proposed outermost centerline, all work areas and access roads will be mowed, and danger trees, if any, will be removed along the entire length of the Project. The definitions of each clearing and slash disposal method as well as the rationale for using each of the respective methods can be found in Appendix F and on the Notes Pages for the EM&CP Drawings in Appendix A.*

The off-site disposal of woody material, chips and stumps will be on an as-needed basis. The off-site disposal of any material will require prior approval by National Grid and DPS Staff.

NG Response III.A.2.ii: *Desirable species consists of typical shrub and low-growing tree species which may be considered to be compatible with the operation of the line (albeit not over the center line). These species will be retained, to the extent practicable, as they occur along the ROW.*

The appropriate clearing and slash disposal techniques will be selected to maximize the retention of these compatible species. The personnel employed for the clearing operation will be fully informed of these vegetation-retention requirements, and directly supervised by a person or persons capable of identifying all compatible species native to the area of the ROW. Lists of desirable low growing tree and shrub species that may, depending on site specific characteristics and location, be compatible with the Facility can be found in Appendix F.

NG Response III.A.2.iii: *Factors that are considered in identifying areas of merchantable timber along the Project ROW are described in Definition of Wood Disposal Methods in Appendix F. Tree clearing activities will be performed by the landowner in all cases. As such, there will be no third party assessment for merchantable timber.*

NG Response III.A.2.iv: *Removal of any wood from the ROW will be pursuant to the NYSDEC's firewood regulations to protect forests from invasive species found in 6 NYCRR Part 192, and any applicable NYSDEC quarantine orders and/or NYSDAM quarantine regulations. The clearing contractor and crews will be made aware of all applicable rules and regulations at the pre- construction meeting. In addition, clearing crews will be trained to identify the Asian Long Horned Beetle, the Emerald Ash Borer, and any other insects that the NYSDEC identifies as a potential problem. If evidence of the existence of these insects is found, they will be reported immediately to the appropriate NYSDEC regional forester.*

3. Soil, Sediment, and Stone Handling

- i. Describe the methods and rationale for contaminated soils testing, as applicable, including field observations for visual or olfactory indicators of contamination, and laboratory analysis.
- ii. Provide disposal locations for excess materials.
- iii. Describe any landowner agreements or commercial facility agreements to receive such materials.
 1. Where testing confirms the presence of hazardous material, provide confirmation that the facility is licensed to accept such material.
- iv. Describe methods of compliance with 6 NYCRR Part 360-366 and applicable New York State Department of Environmental Conservation (NYSDEC), New York State Department of Agriculture and Markets (NYSAGM) and any other federal state or local requirements.

NG Response III.A.3.i: *National Grid does not anticipate coming into contact with contaminated soils during Project construction. However, in the event of a field observation for visual or olfactory indicators of contamination, National Grid will follow*

perform sampling, regulatory reporting, and disposal, in accordance with applicable federal, state, and local requirements. Analytical testing will be performed by a New York State Department of Health Environmental Laboratory Approval Program Certified Laboratory.

NG Response III.A.3 ii: *Off-site disposal of excess material will not occur prior to review and approval from DPS Staff. All excess material generated during this project will be properly managed and disposed of off-site at the following locations:*

- *A 6 NYCRR Part 360 registered or permitted Construction and Demolition Debris Handling and Recovery facility (CDDHRF); and/or*
- *A 6 NYCRR Part 360 permitted landfill; and/or*
- *Distributed to a third party as beneficial reuse fill in accordance with 6 NYCRR 360.13 – Special Requirements for Pre-determined Beneficial Reuse.*

NG Response III.A.3.iii: *For material recycled at a CDDHRF or disposed of at a 6 NYCRR Part 360 permitted landfill, the material will be accepted under the facility's Part 360 registration or permit. For material distributed to a third party, National Grid requires the third party to accept a Distribution of Beneficial Use Fill Material agreement regarding their intended reuse purpose and location.*

NG Response III.A.3.iii.1: *Hazardous waste generated by National Grid shall be disposed of at USEPA permitted Subtitle C facilities which are authorized to accept the material, and that have been approved by National Grid.*

NG Response III.A.3. iv: *National Grid performs classification and characterization of material, recordkeeping and reporting, and transportation and disposal in compliance with 6 NYCRR Part 360-366 and NYSDEC requirements. The Project traverses land that is used for active agricultural purposes as shown on the EM&CP drawings. National Grid will comply with the New York State Department of Agriculture and Markets' (NYSDAM) Applicable Guidelines, Construction Mitigation for Projects on Agricultural Lands (July 2025) on any portions of the Project deemed to require the use of these standards, but it is not anticipated at this time.*

4. Wetlands, Streams and Other Waterbodies

- i. Develop a summary table of wetlands, streams and other waterbodies within the project's Temporary Right-of-Way (ROW):
 1. For each stream and other waterbody, provide a table summarizing the following:
 - a. Municipality;
 - b. Facility location (mileposts);
 - c. GPS coordinates;
 - d. Stream name;
 - e. Field/Map identification name;

- f. Stream flow designation (perennial, intermittent, or ephemeral);
 - g. NYSDEC stream classification;
 - h. Water index number;
 - i. Fishery type; and
 - j. Crossing method and length.
- 2. For each Freshwater Wetland within the project LOD, provide a table summarizing the following:
 - a. Municipality;
 - b. Facility location (milepost);
 - c. GPS coordinates;
 - d. Wetland field designation;
 - e. NYSDEC and NWI Cowardin classification code;
 - f. Wetland cover type;
 - g. Wetland functions and values;
 - h. Crossing method and length;
 - i. Amount of excavation;
 - j. Amount and source of fill (if applicable);
 - k. Proposed structures located within wetland and regulated Adjacent Area;
 - l. Total area (square feet and acres) of temporary and permanent disturbance in wetland and regulated Adjacent Area; and
 - m. Total area (square feet and acres) of conversion of Forested and Scrub-Shrub Wetlands.
- 3. For each Tidal Wetland within the project LOD, provide a table summarizing the following:
 - a. Municipality;
 - b. Facility location (milepost);
 - c. GPS coordinates;
 - d. Wetland type;
 - e. Crossing method and length;
 - f. Amount of excavation;
 - g. Amount and source of fill (if applicable);
 - h. Proposed structures located within wetland a regulated Adjacent Area;
 - i. Total area (square feet and acres) of temporary and permanent disturbance in wetland and regulated Adjacent Area; and
 - j. Existing and proposed lot coverage.
- ii. Provide a narrative description of construction activities within wetlands, State-regulated wetland Adjacent Areas, streams and other waterbodies that includes:

1. A description of the measures to be taken to protect stream bank stability, stream habitat, and water quality including:
 - a. Crossing techniques;
 - b. Crossing structure types;
 - c. Timing restrictions for in-stream work;
 - d. Stream bed and bank restoration measures;
 - e. Vegetation restoration measures; and
 - f. Any site-specific measures to minimize impacts, protect resources, and manage facility construction.
2. A description of all activities that will occur within wetlands or State-regulated Adjacent Areas. Describe how impacts to wetlands, State-regulated adjacent areas, associated drainage patterns, and wetland functions will be avoided and minimized. For State-regulated wetlands and adjacent area this requires an assurance that the proposed activities are consistent with the weighing standards set forth in 6 NYCRR 663.5(e) and (f) and standards for issuance of permits set forth in 6 NYCRR 661.9.
3. A statement that, where new temporary and permanent access roads are to be constructed through wetlands, a layer of geotextile fabric or equivalent underlayment shall be used.
4. A statement that, in the event that construction results in an alteration to wetland hydrology, the breach must be immediately sealed, and no further activity may take place until DPS and NYSDEC staff are notified and a remediation plan to restore the wetland and prevent future dewatering of the wetland has been agreed upon by DPS and NYSDEC.
5. Measures to minimize soil compaction, including the use of temporary matting, low weight to surface area equipment, or constructing when soils are frozen.
6. Measures and details demonstrating how work areas will be isolated from flowing streams and standing water in wetlands, including the use of water handling methods such as sandbags, cofferdam, piping and pumping. The details shall include a discussion of:
 - a. Management of waters accumulated in the isolated work area to ensure settling and filtering of solids and sediments before water is returned to a wetland or waterbody;
 - b. Restoration measures for the isolated work area in streams including the complete removal of the temporary measures, reestablishment of pre-construction contours, and stabilization and seeding immediately following the completion of work; and

- c. The manner by which low flow conditions will be maintained and water depths and velocities similar to undisturbed upstream and downstream reaches will be preserved so that the movement of native aquatic organisms is sustained;
- 7. Measures to minimize impacts to fish and wildlife during construction, including actions to prevent entrapment of fish and wildlife in the work area and, if entrapment occurs, actions to timely and safely move the animals to appropriate undisturbed locations outside the work area.
- 8. Procedures for the removal of all excess fill materials to upland areas at least 50 feet from waterbodies and outside of the State-regulated Adjacent Area, including protocols for documentation of such removal.

NG Response III.A.4.i.1 through III.A.4.i.3: A total of 409 wetlands and 198 waterbodies were identified within the Project area, 164 of which were also NYSDEC regulated wetlands. Table C-1 in Appendix C provides the requested information for all the wetlands traversed by the Project. Table C-4 puts forth a summary of all the temporary and permanent wetland impacts associated with State regulated wetlands and adjacent areas.

Field-verified waterbodies traversed by the Project are shown on the EM&CP Drawings in Appendix A and listed in Table C-3 in Appendix C where the municipality, facility location (mileposts), GPS coordinates, stream name, field/map identification name, stream flow designation (perennial, intermittent, or ephemeral), NYSDEC stream classification, water index number, fishery type and crossing method and length are provided in tabular form.

There are no tidal wetlands associated with the Project.

NG Response III.A.4.ii.1: The protection of stream bank stability, stream habitat, and water quality are of high priority during the development of the EM&CP and measures to protect and minimize disturbance to streams and waterbodies will be implemented throughout all phases of construction. As part of the EM&CP preparation, all streams and waterbodies, both on and off ROW, were delineated in the field and identified on the EM&CP Drawings. All streams and waterbodies will be re-flagged prior to the start of construction to help ensure their protection. Protection measures and “Restricted Activities” within proximity of streams and waterbodies are identified below in National Grid’s Response to Section III.B.4.v. Additional protection measures are described in Certificate Conditions 98a-t. The measures identified above will be implemented throughout all phases of construction.

Best Management Practices (BMPs) such as the installation of erosion and sediment control devices to prevent the introduction of sediment into aquatic resources will be carried out from the beginning to the end of construction in accordance with the Project SWPPP (Appendix G). All erosion and sediment control devices prescribed by the

SWPPP are shown on the EM&CP Drawings in Appendix A. SWPPP inspections will take place every seven (7) days to minimize the risk of any water quality violations or stormwater discharges to streams or wetlands as identified in GP-0-25-001. Upon the completion of construction, all disturbed areas will be restored and seeded and mulched with a conservation seed mix to restore bank stability and establish vegetative cover. SWPPP inspections will occur until construction is completed and all disturbed areas have been stabilized and will then continue on a monthly basis until all disturbed areas have achieved 80% vegetative cover.

NG Response III.A.4.ii.2: *A description of the activities that will occur in wetlands is set forth above. To the extent there are temporary impacts to wetlands, the BMPs identified in the response to Section III.A.4.ii.1 provides the means to minimize such impacts. To the extent that there will be permanent wetland impacts, including wetland conversion, these will be addressed as part of the wetland mitigation that will be provided as a means to address the functions and values of those wetlands impacted.*

NG Response III.A.4.ii.3: *See response to Section III.A.4.ii.2.*

NG Response III.A.4.ii.4: *No permanent access roads are anticipated to be constructed in wetlands as a part of the Project. If this changes, National Grid will consult with NYSDEC, DPS Staff and any other pertinent jurisdictional agency, this may require a change to the EM&CP to comply with Condition 30.*

NG Response III.A.4.ii.5: *National Grid will comply. If any construction results in a breach of hydrology of a wetland feature, work will be ceased until further consultation and approval of a remediation plan with DPS Staff and the NYSDEC has occurred.*

NG Response III.A.4.ii.6: *National Grid intends to utilize matting in any area of temporary disturbance that is delineated as wetland in order to provide access to work areas of the project while minimizing surface compaction and impact to the resource.*

NG Response III.A.4.ii.7: *See the Response to Section III.A.4.ii.1. Due to the nature of the wetlands and streams crossed by the Project, it is not anticipated that there will be impacts to fish and wildlife during construction. If entrapment occurs, National Grid will remove all fish or wildlife to the downstream side of the excavation to allow for free movement outside of the work zone.*

NG Response III.A.4.ii.8: *Excess fill disposed on site will be spoiled in upland areas at least 100 feet from identified waterbodies and outside of the State-regulated adjacent area in accordance with Condition 98(i). Some spoils excavated from wetland areas may be staged, dewatered and re-used as backfill within the wetland area. In that event, the upper horizon of backfill will be wetland soils that have been temporarily stockpiled on site for reuse. Any off-site disposal of spoils will be approved for disposal with DPS Staff.*

5. Wetland & Waterbody Restoration

- i. Include the following measures and details:
 1. Restoration of pre-construction site conditions and stabilization of disturbed wetlands and waterbodies, as site conditions and facility design allow, within 48 hours or as soon as practicable after completion of construction, not to exceed seven (7) days.
 2. Restoration of disturbed streams as follows:
 - a. Stabilization of stream banks above ordinary high-water elevation with natural fiber matting, seeded with appropriate perennial native riparian species, and mulched with straw, or other required stabilization measures, within two (2) days of final grading;
 - b. Unless otherwise designed as part of a site-specific grading plan stamped by a professional engineer and developed in consultation with NYSDEC and DPS Staff, streams must be equal in width, depth, gradient, length, and character as the pre-existing conditions and tie in smoothly to the profile of the stream channel upstream and downstream of the project area. The planform of any stream must not be changed; and
 - c. Woody stream bank vegetation must be replaced with ROW compatible native plantings as site conditions and facility design allow.
 3. Plans for revegetation of disturbed wetlands and State-regulated Adjacent Areas with native plants. Appropriate native wetland species mixes must be described.
 4. Plans for monitoring of restoration areas until an 80% cover of native plant species with the appropriate wetland indicator status has been reestablished over all portions of the restored area.

NG Response III.A.5.i.1: National Grid will restore all portions of the ROW to conditions and contours in line with pre-existing conditions. Restoration and stabilization will begin as prescribed, within 48 hours of completion of construction or as soon as practicable pending site conditions.

NG Response III.A.5.i.2a through II.A.5.i.2c: Any disturbed streams will be stabilized with appropriate erosion control product, seed and straw, as prescribed by the Blue Book and will be seeded with the seed mixes proposed on the notes sheets of the Plan and Profile drawings in Appendix A. Areas of a stream bank within wetland will utilize the defined wetland seed mix. All grading will be restored to pre-existing conditions where possible. Woody vegetation on the banks of the streams will be replaced as practicable, pending restoration and will be identified in coordination with the Environmental Monitor and DPS Staff.

NG Response III.A.5.i.3: *Wetland seed mixes and seeding rates to be utilized on the Project are found on Sheet 8 of the Plan and Profile drawings in Appendix A.*

NG Response III.A.5.i.4: *Monitoring of the restoration of the project will continue until 80% revegetation occurs. This will be completed concurrently with the SWPPP inspection requirements and monitored over time to maintain compliance with the SPDES permit. During this monitoring period, National Grid will confirm wetland indicator status and will report to DPS Staff when this is reached for review and approval.*

6. Stream Crossings

- i. Bridges shall be utilized for each new permanent protected stream crossing and shall span the stream bed and banks. Detailed description of all proposed stream crossing locations and methods, with reference to the Stream Crossing Plan, plans, details, profile, etc.
- ii. If a bridge is not practicable for a new permanent stream crossing, an alternatives analysis must be provided, including written justification for why a bridge is not practicable.
- iii. For stream channels with slopes greater than 3% an open bottom culvert must be used, unless otherwise agreed upon by DPS Staff and NSYDEC. All culverts shall be designed to:
 1. Contain native streambed substrate or equivalent;
 2. Be a minimum width of 1.25 times the width of the stream bed. The stream bed is measured bank to bank at the ordinary high-water level or edges of terrestrial, rooted vegetation;
 3. Include a slope that remains consistent with the slope of the upstream and downstream channel; and
 4. Facilitate downstream and upstream passage of aquatic organisms.
- ii. For any proposed culverts, protocols for maintaining adequate function, including plans for maintenance, repair, and replacement.

NG Response III.A.6: *No permanent stream crossings are anticipated as part of the Project. If a stream crossing becomes necessary, National Grid will comply with this provision and use a bridge.*

7. Agricultural Areas

- i. Describe programs, policies, and procedures to mitigate agricultural impacts such as soil compaction.
- ii. Explain how construction plans either avoid or minimize crop production losses and impacts to vulnerable soils, including lands in active agricultural production and with particular consideration of lands located within NYS Certified Agricultural Districts and containing Mineral Soil Groups 1-4.
- iii. Indicate specific techniques and references to appropriate agricultural protection measures recommended by NYSAGM.

- iv. Describe measures for repair of any inadvertent damages to surface or sub-surface drainage features.

NG Response III.A.7: *The Project ROW crosses Jefferson County Agricultural District 1, Onondaga County Agricultural District 3, and Oswego County Agricultural District 11. During construction, agricultural operations within the ROW may be disrupted for at least one growing season, depending on the timing and duration of construction. If possible, structure removal and replacement will be timed for drier or frozen periods of the year to minimize rutting. If temporary construction mat access is not practicable or desirable, topsoil may be stripped and stockpiled from work areas within crop fields and then replaced following the completion of work. Should soil rutting occur, areas will be graded and restored to the farm operator's satisfaction*

Agricultural fields and districts are identified on the EM&CP Plan and Profile drawings in Appendix A and are shown in Appendix D. Agricultural districts and Mineral Soil Groups 1-4 are provided in Appendix D.

National Grid will make every effort to coordinate construction activities with ongoing farming activities in order to minimize disruption and crop damage and will ensure that construction, initial restoration, post-construction monitoring and follow-up restoration is in accordance with all conditions of the Commission Order. In addition, prior to submitting a request for change, the Environmental Monitor will consult with NYSDAM regarding any change to the approved EM&CP that might affect agricultural lands.

8. Sensitive Land Uses

- i. Describe the sensitive land uses (e.g., hospitals, emergency services, sanctuaries, schools, residential areas, parks/recreational areas, local businesses, etc.) that may be affected by construction of the facility, or by construction-related traffic, and specify measures to minimize the impacts on these land uses.

NG Response III.A.8: *The location of sensitive land uses and resources that may be affected by construction of the Project or by construction-related traffic (e.g., hospitals, emergency services, sanctuaries, schools, and residential areas) are shown and annotated on the EM&CP Drawings in Appendix A. The areas identified include the following:*

Sensitive Land Uses			
Structure Number	Segment	Land Use	Name
193 – Lines 7 & 27	6	Community Services	Valerie Meyers NP-Northern Family Care
194 – Lines 7 & 27	6	Community Services	Highland Animal Hospital
196 & 197 – Lines 7 & 27	6	Community Services	Central Square Little League Fields

Sensitive Land Uses			
Structure Number	Segment	Land Use	Name
200 – Lines 7 & 27	6	Community Services	CNY Chapter NRHS-Central Square Museum
246-270 – Lines 5 & 6	3	Recreation and Entertainment	Chateaugay State Forest
179-183 – Lines 5 & 6	3	Recreation and Entertainment	Little John Wildlife Management Area
283-305 – Lines 5 & 6 & 3-9 – Lines 17 & 27	3, 4 & 5	Recreation and Entertainment	Lower Salmon River State Forest
57-93 & 106-117 – Lines 5 & 6	1 & 3	Recreation and Entertainment	Tug Hill State Forest
179-183 – Lines 5 & 6	3	Recreation and Entertainment	Winona State Forest
Multiple	All Segments	Residential	See Appendix A and Appendix E, Table E-3 for Residences within 100 ft of the ROW

9. Cultural and Scenic Resources

- i. Describe the cultural and scenic resources that may be affected by construction of the facility or by construction-related traffic and specify measures to minimize impacts on these resources. For any areas where the Certificate Holder could not obtain access permissions prior to application filing, provide:
 1. Copies of completed Phase IB, Phase II and Phase III studies, if applicable;
 2. A description and documentation of the Certificate Holder's consultation with OPRHP, local historic preservation groups, and Consulting Indigenous Nations related to such studies; and
 3. Final OPRHP effect or impact determination letter(s) for any applicable areas.

NG Response III.A.9: *National Grid has filed with the Commission copies of all Phase IA/IB studies and addendums for the Project with the exception of an additional Phase 1A and Phase 1B archaeological evaluation, which was recently conducted along several additional work areas and access routes not covered by previous surveys in May 2026. The results of these evaluations were submitted to SHPO in July 2026 in order to receive concurrence that no further study is necessary and the project will have no effect on archaeological resources. With the exception of the recent July 2026 OPRHP submission, National Grid has filed descriptions and documentation related to its consultations with OPRHP, local historic preservation groups, and Consulting Indigenous Nations related to such studies. All final OPRHP effect or impact determination letter(s) have been filed with*

the Commission with the exception of the pending OPRHP determination letter for the July 2026 submission.

10. Access Roads, Lay-down Areas and Workpads

- i. Discuss the proposed access to the project ROW, including the areas where temporary or permanent access is required; the nature of access improvements based on natural features, equipment constraints; and vehicles to be used for construction and maintenance, and the duration of access needs through restoration and the maintenance of the facility.
- ii. Discuss the types of access which will be used and the rationale for employing that type of access, including consideration of:
 1. Temporary installations;
 2. Permanent installations;
 3. Use of existing roads, driveways, farm lanes, rail beds, etc., and a description of any improvements required to meet applicable standards or otherwise needed for construction of the project; and
 4. Other proposed access.
- iii. Indicate the associated drainage and erosion control features to be used for access road construction and maintenance.
- iv. Indicate the type(s) of stream crossing method to be used in conjunction with temporary and permanent access road construction, including rationale for each proposed crossing method.
- v. All diagrams and specifications should include material type and size to be placed in streams and at stream approaches.
- vi. If access and workpad areas cannot be limited to upland areas, provide justification for any access and workpad areas which are proposed to be located in a wetland, stream or waterbody.
- vii. Indicate any required temporary or permanent grading associated with accesses roads, work areas and any other grade alterations.

NG Response III.A.10: *For the construction of this Project, National Grid will need to gain access with heavy equipment to the Project ROW. Providing reliable and readily available permanent access for future maintenance of the Facility is also a consideration in determining the location and type of access roads to be constructed.*

Temporary construction matting will be used primarily in sensitive areas such as wetlands, residential areas and areas of active agriculture. The Contractor may choose to use temporary timber mat roads for other applications based on time of year, site conditions and cost. In addition, in some limited instances where construction activities are minimal, the number of trips across a sensitive area can be minimized and construction can be limited to times of dry or frozen soil conditions, the use of low ground pressure equipment may be prescribed in-lieu of temporary timber mat roads, and otherwise designated as "Work Area, Minimal Impact."

In areas where existing gravel or paved road surfaces and travel lanes offer good access to the facility locations, they will be used to the fullest extent practicable to minimize disturbance during construction. Minor improvements to the existing surfaces will be made as necessary and all areas will be restored to pre-existing conditions.

In areas designated as “Improve as Necessary”, temporary gravel access may be used by the Contractor on an as-needed basis. Upon completion of construction, all temporary gravel access roads will be removed or restored to a permeable condition.

Significant environmental impacts to existing vegetation, water, and soil resources will be avoided by using and/or improving existing access roads or paths to the maximum extent possible and by properly locating any new access roads that may be required. The siting of access roads will be based primarily on factors such as the avoidance of environmentally sensitive resource areas (i.e., wetlands and agricultural fields); minimization of potential erosion problems; and maximization of the use of existing roadways. In addition, with permission from affected landowners, off-ROW access may be prescribed in certain locations to avoid or minimize impact to sensitive site conditions such as steep slopes, streams, and wetlands.

Mitigation measures such as the use of temporary timber mats or low ground pressure equipment (only as approved and directed by the Environmental Monitor) will be prescribed on a site-by-site basis in environmentally sensitive areas such as wetlands, streams, and residential areas. In addition, erosion and sediment control measures designed to maintain and protect soil and water resources both during and after construction will be prescribed for all areas where soil disturbance occurs.

The location and type of all limits of disturbance as well as the areas where improvements to existing access roads will be made are shown on the EM&CP Drawings in Appendix A. Areas where off-ROW access is proposed are also shown on the drawings and are identified in Table N-1 in Appendix N. Diagrams and specifications for all types of roads and stream crossing devices are also provided as part of the EM&CP Drawing set in Appendix A. Any proposed permanent access roads to be installed as part of the Project will be approved by the Environmental Monitor and DPS Staff. If the need for any permanent roads is identified, the road will be reviewed and designed in accordance with the Blue Book Stormwater Design Manual and the Project SWPPP will be updated accordingly.

Stormwater treatment using erosion and sedimentation (E&S) controls will be utilized to control stormwater runoff and to stabilize soil disturbed during the construction of the access roads, laydown areas and work areas. Stormwater runoff will be managed primarily by the use of perimeter erosion controls, water bars or diversion ditches, level spreaders and infiltrating vegetated buffer strips. Once constructed, the ROW will be maintained under a detailed vegetation management plan that encourages the growth of herbaceous plant communities, and vegetated buffer strips are ideally suited for infiltrating stormwater back into the groundwater table.

Stormwater E&S controls will also be installed to prevent soil erosion and sediments from leaving the controlled work area and Project ROW. E&S controls such as staked silt fencing, erosion control socks (coir logs, straw wattles), rolled erosion control products (RECP), turf reinforcement mats (TRM), hydro-seeding, and hydro-mulching will be extensively used throughout the site. Gravel road locations including horizontal and vertical alignments have been engineered to minimize soil disturbance to the extent practicable thus further reducing the risk of erosion and sediment pollution.

All erosion and sediment control practices have been designed in conformance with the technical standards found in NYS Standards and Specifications for Erosion and Sediment Control (Blue Book) the most recent of which is dated November 2016. All stormwater management measures and E&S controls are shown on the EM&CP Drawings in Appendix A and the details and specifications for each of the prescribed erosion control features are provided in the proposed SWPPP document in Appendix G.

To the extent possible, access roads and work areas have been laid out to avoid wetlands, adjacent areas, streams and waterbodies. Work areas and the majority of access in wetlands will be matted and will have only a temporary impact to the resource.

The location and type of all access roads, both on and off-ROW, and all mitigation measures and erosion and sediment control measures are shown on the EM&CP Plan and Profile Drawings in Appendix A.

11. Construction Noise

- i. Specify procedures to be followed to minimize noise impacts related to ROW clearing, and construction and operation of the Facility.
- ii. Describe notifications and noise impact avoidance and minimization measures to be implemented for potentially impacted sensitive sound receptors during extended work hours, as defined in the Certificate.
- iii. Indicate the types of major equipment to be used in construction or Facility operation; sound levels at which that equipment operates; days of the week and hours of the day during which that equipment will normally be operated; any exceptions to these schedules; and any measures to be taken to reduce audible noise levels caused by either construction equipment or Facility operation.

NG Response III.A.11: *Noise-sensitive areas are generally considered to be residential dwellings, residential developments, commercial businesses and institutional establishments (schools, churches, hospitals) located near the Project ROW. All such areas can be seen on the EM&CP Drawings in Appendix A. In addition, Table E_3 in Appendix E provides a list of all residences/buildings within 100 feet of the Project ROW. Information regarding noise mitigation can be found in Appendix E and in Response III.B.9 of this EM&CP. Notes regarding normal work hours (7:00 am to 7:00 pm Monday through Saturday) have been placed on the plan and profile drawings.*

12. Ecological and Environmentally Sensitive Sites

- i. Indicate the procedures that were followed to identify ecological and environmental resources and specify the measures that will be taken to avoid and minimize impacts to these resources. Include any survey reports or other reports prepared to identify and analyze such sites.
- ii. Provide a list of all RTE plant or animal species potentially located within the facility corridor and any other areas where construction-related activities may occur.
- iii. Describe methods for training contractors and other on-site personnel on identifying those RTE species indicated as potentially located within the facility corridor, or evidence of the presence of those species.
- iv. Describe measures that will be taken in the event that RTE species are known to exist in the project area or are otherwise observed, including avoidance and minimization measures that will be implemented.
- v. Provide an updated list of protected native plant species, including confirmation of the locations of protected native plants listed in 6 NYCRR 193.3 that have been previously observed to occur within the facility corridor.

NG Response III.A.12: *Appendix S provides a list of all RTE species potentially located within the Project ROW. Certificate Condition 87 requires National Grid to provide all authorized on-site personnel with information on any protected T&E plant or animal species and their associated occupied habitat, as applicable, identified by the New York State Natural Heritage Program or as documented and substantiated by the NYSDEC, located within or contiguous to the Project limits of disturbance and indicate measures to avoid and minimize risks to said species. Certificate Condition 96 requires National Grid to prepare and submit for approval to NYSDEC a NCBP in the event that full avoidance of impacts to individual T&E animal species or its habitat is impracticable.*

13. Invasive Species

- i. Summarize the invasive species known to exist within the facility corridor based on publicly available information or the results of pre-construction invasive species surveys.
- ii. Summarize the methods that will be used to minimize the spread and prevent the introduction of invasives species during construction of the project.
- iii. Describe measures to be taken if project activities are observed to cause a spread of invasives species.
- iv. Where applicable, provide cross references to the project's Invasive Species Management Plan.

NG Response III.A.13: *The Project's Invasive Species Management Plan (ISMP) can be found in Appendix M. This plan contains summaries of the invasive species noted in pre-construction surveys. In addition to the ISMP, National Grid will work in accordance with the "New York Utility Company Best Management Practices for Preventing the*

Transportation of Invasive Species” developed by the Environmental Energy Alliance of New York, in 2015.

14. Herbicides

- i. Specify the locations where herbicides are to be applied. Provide a general discussion of the site conditions (e.g., land use, target and non-target vegetation species composition, height, and density) and the choice of herbicide, formulation, application method, and timing.
- ii. Confirm that all herbicides that will be used have valid registrations under applicable State and federal laws and regulations.
- iii. Describe the procedures that will be followed during application to protect non-target vegetation, streams, wetlands, potable waters and other water bodies, and residential areas and recreational users on or near the ROW.

NG Response III.A.14.i: *Herbicide applications will be determined by the National Grid Transmission Forester on a site-by-site basis during the construction phase of the project. Site selection for herbicide application will be in accordance with the DPS approved TROWMP and the Certificate Conditions. The TROWMP discusses herbicide application; prescriptions, process, procedures, and protocols in consideration of land use considerations, target and non target species, height, and density of target and non-target vegetation. The herbicide formulation will be prescribed by the National Grid Forester based on the site attributes, application prescription and any special considerations – the list of herbicides that may be utilized during clearing, construction, and foliar follow up can be found in Appendix L. The application methods and timing will be as follows: 1) Where practicable and safe – cut stumps that have the ability to resprout from the stump or roots will be immediately treated with herbicide. 2) A selective foliar follow up will be completed in the impacted portion of the ROW as part of the project requirements. This will occur two growing seasons after the initial cutting. Certificate Condition 73 also includes additional restrictions regarding the use of herbicides. See Appendix L.*

NG Response III.A.14.ii: *All herbicides to be used during clearing, construction, and foliar follow up can be found in Appendix L. All herbicides on the National Grid approved list are vetted for compliance with all state and federal laws and regulations.*

NG Response III.A.14.iii: *The procedures for herbicide application to protect non-target vegetation are addressed in the TROWMP and National Grid operating Specifications. Buffers for protecting water sources, residential areas and recreational users are detailed in the TROWMP. In addition, notification of adjacent landowners will be administered in accordance with NYSDEC Regulations and Certificate Conditions.*

15. Fugitive Dust Control

- i. Specify appropriate measures that will be used to minimize fugitive dust and airborne debris from construction activity.

NG Response III.A.15: *National Grid will take appropriate measures to minimize fugitive dust and airborne debris from construction activity. Exposed soils and roadways will be wetted as needed during extended dry periods to minimize dust generation. To the extent practicable, water for dust control shall come from municipal water supplies/sources. If surface waters are used, equipment shall be disinfected afterwards. Dust control will conform to the NYSSESC Standards and Specifications for Dust Control.*

16. Terrestrial Blasting

- i. Describe and identify on maps the proposed locations of blasting, including a characterization of the subsurface conditions at each proposed blast site and provide an explanation for why other, mechanical excavation methods are not feasible.
 1. Identify any nearby receptors that may be adversely affected by blasting operations and describe any pre-blast surveys completed and/or planned.
 2. Provide the results of any geotechnical investigations completed at proposed blasting locations.

NG Response III.A.16: *There are present no plans for blasting on this project. Should it be determined that blasting is necessary, National Grid will prepare and submit a blasting plan for approval prior to conducting any blasting on the project.*

17. Environmental Supervision

- i. Describe protocols for supervising demolition, vegetation clearing, use of herbicides, construction, and site restoration activities to ensure minimization of environmental impact and compliance with the environmental protection provisions specified by the Certificate.
- ii. Specify the titles and qualifications of personnel proposed to be responsible for ensuring minimization of environmental impact throughout the demolition, clearing, construction, and restoration phases, and for enforcing compliance with environmental protection provisions of the Certificate, Stormwater Pollution Prevention Plan (SWPPP), and the EM&CP. Indicate the amount of time each supervisor is expected to devote to the project.
- iii. Specify responsibilities for personnel monitoring all construction activities, such as clearing, sensitive resource protection, site compliance, EM&CP change notices, etc.
- iv. Explain how all environmental protection provisions will be incorporated into contractual specifications, and communicated to those employees or contractors engaged in demolition, clearing, construction, and restoration.
- v. Describe the procedures to “stop work” in the event of a Certificate violation.
- vi. Identify the Certificate Holder’s designated contact, including 24/7 emergency phone number, for assuring overall compliance with Certificate conditions.

NG Response III.A.17.i through III.A.17(iii): *Supervision of demolition, vegetation clearing, use of herbicides, SWPPP compliance, and construction, and site restoration*

activities will be done by the Environmental Monitor, Construction Inspector, and National Grid's Central Division Forester, each in their respective roles. The responsibilities and qualifications for the Environmental Monitor, Construction Inspector and Agricultural Monitor are provided in Appendix W.

The name and qualifications of the Environmental Monitor and Construction Inspector will be submitted to DPS Staff at least two (2) weeks prior to the start of construction.

NG Response III.A.17.iv: *All contract work that has been awarded and will be awarded in the future is with the understanding that the Certificate and the approved EM&CP, including the EM&CP Drawings, are the guiding documents for the management of construction on this Project and will be reviewed in detail at a pre- construction meeting with all contractors working on the Project.*

NG Response III.A.17.v: *The Environmental Monitor, as well as the Construction Inspector, Safety Inspector and Division Forester will have "stop work" authority over all aspects of the Project. Protocol for "stop work" directives are described in Certificate Conditions 63 and 69.*

NG Response III.A.17.vi: *The Company's designated contact for assuring overall compliance with Certificate conditions will be the Project Manager assigned to this Project. The name and 24/7 contact number for the Project Manager will be provided to DPS staff at least two (2) weeks prior to starting construction.*

18. Clean-up and Restoration

- i. Describe the Certificate Holder's program for ROW clean-up and restoration, including:
 1. Removal of any temporary roads; restoration of lay-down or staging areas; the finish grading of any scarified or rutted areas; and the removal of waste, scrap metals, surplus or extraneous materials or equipment used.
 2. Plans, standards, and a schedule for the restoration of vegetative cover, including, but not limited to, specifications to address:
 - a. Design standards for ground cover, including:
 1. Species mixes and application rates by site;
 2. Site preparation requirements (soil amendments, stone removal, subsoil treatment, or drainage measures, etc.); and
 3. Acceptable final cover percentage by cover type.
 - b. Planting installation specifications and follow-up responsibilities.
 - c. A schedule or projected dates of any seeding and/or planting.
 - d. Plans to prevent unauthorized access to and along the ROW.
 3. Roadway and Guiderail restoration (if not addressed elsewhere).
 4. Plans for post-construction site restoration inspections and reporting.
 5. Name, office, and title of person(s) responsible for project site restoration.

NG Response III.A.18: *All temporary roadways, whether gravel or timber mat, will be removed as part of final restoration after all construction for which they served has been completed. All disturbed areas, including temporary roadways, lay-down areas and scarified or rutted areas will be restored, seeded and mulched within fourteen (14) days from the time construction in that area has ended.*

During construction, the ROW will be kept free of construction debris and to the extent possible. As construction continues, each section of the ROW will be thoroughly cleaned within one week after construction is completed on that particular section. All debris resulting from construction such as piping, fencing, wiring, concrete and any other materials generated will be disposed of at an approved disposal site in compliance with all appropriate environmental regulations. Under no circumstances will any debris be burned or buried either on or off the ROW.

The plans, standards and schedule for restoration of the ROW are provided in the SWPPP in Appendix G. SWPPP inspections will take place on a weekly basis until construction is completed and all disturbed areas have been stabilized and will then continue on a monthly basis until all disturbed areas have achieved 80% revegetation, unless identified as in an unvegetated state prior to construction in the EM&CP and Appendix AH. DPS staff will be copied on all SWPPP inspection reports. National Grid's plans for preventing unauthorized access to and along the ROW are provided in Response 58 of this EM&CP. A post construction assessment of the Facility, in consultation with DPS Staff, shall be conducted to determine if any additional fences, gates or berms are necessary to prevent unauthorized access on the facility ROW. The person responsible for restoration of the ROW and full compliance with all Certificate Conditions will be the Project Manager assigned to this Project. The name and contact number of the Project Manager will be provided to DPS staff at least two weeks prior to starting construction.

19. Visual Impact Mitigation

- i. Provide a proposal to address visual mitigation, for impacts including but not limited to road crossings, adjacent property owners, and visually sensitive areas including visually sensitive historic properties.
- ii. Discuss the use of existing vegetation or proposed landscape plantings as screening, earthwork, or site-specific requisites to provide the maximum extent of visual mitigation of facility components practicable.
- iii. Provide plant lists comprised of appropriate native plants based on site characteristics and a reconnaissance of the native plants found within the facility corridor.
- iv. Provide details comprised of landscape plans and specifications and an inspection and maintenance program for the life of the project, including plans for replacement of plantings where such visual screenings have failed.

NG Response III.A.19: *There are no screening or landscape plans presently proposed for the Project. In accordance with Certificate Condition 58, within one year after completion of construction, National Grid will prepare a plan for any visual mitigation*

found necessary and will provide a draft of the plan to DPS staff for review subsequent to submittal of the final plan to the Secretary. The name and title of the preparer of said plan will be provided at that time.

20. Real Property

- i. Provide an attestation that all real property and access rights necessary for construction of the applicable phase or segment of the project have been obtained.
 - 1. If applicable, copies of approved occupancy rights for any railway properties, including all design and construction plans, and a copy of all specifications and engineering computations for the proposed occupancy.
 - 2. If applicable, copies of crossing agreements with owners of railroad tracks or beds crossed by the project, including all design and construction plans, and all specifications and engineering computations, for the proposed crossings.

NG Response III.A.20: *National Grid has obtained Danger Tree and Easement rights for all installations proposed within this EM&CP document. Temporary Construction, Off-ROW Access, and Staging/Marshalling Area rights are still in the process of being acquired. Attestations for real property and access rights acquired to date and remaining real property and access rights to be acquired are presented in Appendix B.*

21. ROW Encroachment Plan

- i. Provide detailed plans for identifying and resolving potential encroachments to the existing and proposed ROW.
- ii. Provide justification for any proposed acquisition, removal, or relocation of any buildings or structures.

NG Response III.A.21: *A ROW Encroachment Plan is provided in Appendix O.*

22. Safety and Security

- i. Describe plans to prevent unauthorized access to and along the ROW, including but not limited to:
 - 1. Posting signs at the edges of the project ROW in those locations where the ROW intersects public roads;
 - 2. Performing outreach to educate and inform the public concerning the risks and impacts of unauthorized access;
 - 3. Consulting with local law enforcement officials in an effort to prevent future trespassing;
 - 4. Identifying construction and material details of gates, berms and landscaping if any; and
 - 5. Conducting a post-construction assessment of the project, in consultation with DPS Staff, to provide a final determination of locations of any gates, berms and landscaping.

NG Response III.A.22: See National Grid's response to Condition 59.

23. Electric and Magnetic Fields

- i. Provide a certification from a Professional Engineer licensed by the State of New York stating that, if constructed in accordance with the final design plans, the Transmission facility will comply with the applicable electric and magnetic field ("EMF") standards, established by the Commission in Opinion No. 78-13 (issued on June 19, 1978), and the Statement of Interim Policy on Magnetic Fields of Major Electric Transmission Facilities (issued on September 11, 1990).

NG Response III.A.23: The EMF report for the Project was filed with the Commission on May 12, 2025. A certification that the Project will comply with applicable EMF standards is contained in that report.

24. In-Water Facilities

- i. For construction of in-water facilities, the EM&CP shall include:
 1. Details and manufacturers' specifications for any equipment that will be used for installation of the cable and associated facilities.
 2. A detailed description of the following construction practices for installation (as applicable):
 - a. Any site preparation activities along the installation route, including but not limited to, as applicable: pre-lay grapnel run, boulder removal/relocation, marine debris removal, unexploded ordinances (UXO) clearance, removal of existing infrastructure, pre-installation surveys, pre-sweeping, pre-lay mattress installation, utility crossing preparation, and/or pre-trenching, etc. Include a narrative and maps indicating the locations at which each method is expected to be employed.
 - b. Installation methods, including but not limited to: mechanical cutter, mechanical plow (which may include a jetting system), jet sled, jet trencher, vertical injector, hydraulic/suction hopper dredging, mechanical dredging, and/or mass flow excavator. Include a narrative and maps indicating the locations at which each method is expected to be employed.
 - c. The location(s) of any HDD exit pit(s).
 - d. Transition methods for HDD to in-water cable.
 - e. Cable pulling and splicing plans, including details associated with any proposed installation of spare conduits within the in-water ROW.
 - f. Cable-laying methods including barge positioning and midline buoys, if necessary.
 - g. How the use of anchoring, if any, during construction and maintenance activities will avoid and/or minimize impacts to sensitive benthic

habitats, Recognized Ecological Complexes, historic and archeological resources, and impacts to existing buried assets.

- h. The parameters for the use of anchors and spuds, the limits of the anchoring corridor, and identification of discrete “No Anchor” areas in the event anchoring is ultimately required.
 - i. Measures that will be employed to minimize sediment disturbance caused by anchoring during construction.
 - j. How the proposed construction equipment and methods avoid and/or minimize impacts related to the in-water environment and why the proposed construction equipment and methods are most suitable for construction of the facility. At a minimum, the EM&CP shall address the following:
 - 1. How the equipment first avoids, and if avoidance is not possible, minimizes impacts related to the sediment surface, shading, and submerged aquatic vegetation (SAV);
 - 2. How the chosen equipment is the minimum size practicable to conduct the work;
 - 3. Why the equipment is most suitable for the site, including the equipment’s ability to handle ice loads; wind and erosion; tidal flux; and existing uses, grades, and bathymetry;
 - 4. Why the equipment is suitable for the duration required to construction the Project;
 - 5. Provides a safe work area and how it reduces human safety hazards.
 - k. Details on the area and duration of any temporary in-water closures needed during project installation activities, including HDD and cable laying activities and a description of how these areas have been minimized to the maximum extent practicable.
 - l. Details on how mariners, including commercial, recreational, for-hire (charter) fishermen, and other recreational boaters, will be alerted to the presence of the in-water work area, including any Private Aids to Navigation that may be required in State waters, and identification of activities that will be the subject of United States Coast Guard’s Local Notice to Mariners.
- 3. A description of cable burial techniques and adjustments along the marine route, including:
 - a. A detailed graphical representation of anticipated minimum and maximum achievable burial depths based on sediment conditions at regular intervals that are appropriate for the scale of the project;
 - b. A written evaluation of the likelihood of achieving target burial depths based on the results of the study; and
 - c. A quantitative analysis of risks to the cable and coastal users along the marine route.
 - 4. A written evaluation of the efficacy of alternative cable protection measures that may be required along the in-water route and justification for why the

selected cable protection method is preferred at each site. The analysis shall:

- a. Include, to the extent available, technical documentation from cable protection manufacturers.
 - b. Evaluate a range of cable protection measures', including but not limited to concrete mattresses with taper edges, crushed rock, and rock bags or other appropriate protection method(s), with respect to their ability to maintain overtrawlability, minimize shifting over time, and avoid creating a discernable berm on the sediment surface.
5. A narrative discussion of any limiting factors to completing construction as proposed in the project schedule including but not limited to availability of any required vessel(s), equipment, material, specialized personnel, etc.

NG Response III.A.24: *There are no in-water cable installations associated with the Project.*

B. EM&CP PLAN AND PROFILE DRAWINGS AND MAPS

Section B of the EM&CP shall include the project's plans and profiles, details, sections and design drawings, and maps. Each drawing or figure shall be clearly titled, numbered, and dated to its version. All design drawings and figures are to be stamped and signed by a licensed Professional Engineer and shall reflect the final design of the facility.

1. Plan View Requirements

Plan drawings at a legible common engineering scale (recommended at a scale minimum 1 inch = 200 feet) showing or otherwise including:

- i. A drawing index and drawing index (key) map.
- ii. A legend identifying existing and proposed features shown on the plans.
- iii. Contour lines at a minimum of 5-foot intervals. Where contours are based on recently completed on-site surveys, contours shall be taken at two-foot intervals, completed by a licensed surveyor, and referenced to the National Geodetic Vertical Datum (NGVD) or North American Vertical Datum of 1988 (NAVD88).
- iv. Station numbering (stationing) along the centerline of proposed electric line(s) which shall be continuous along the entire length of the cable.
- v. Construction notes, including all appropriate information for the contractor.
- vi. A table showing property owner information and associated parcel number, stationing, and type of easements.
- vii. A table showing splice locations, methods, and associated stationing location.
- viii. A table showing co-located infrastructure information, including owner information, station location of proposed crossings, and agreement status.
- ix. The boundaries of any new, existing, and/or expanded ROW or road boundaries, and where conductors are to be constructed overhead, underground or in-water.
- x. Areas contiguous to the ROW or street within which the Certificate Holders will obtain additional property rights.

- xi. Host and adjacent property lines and associated landowner information.
- xii. Locations of each proposed structure related to the major electric transmission facility.
- xiii. Components of the major electric transmission facility complying with any applicable local setbacks, including fence, gate, down-guy anchor, any counterpoise required for the facility, conductors, insulators, location of mid-span splices, static wires, and any other components attached to facility structures.
- xiv. Unique symbols distinguishing proposed and existing overhead and underground conductors.
- xv. Proposed trenchless and in-water installation locations, including their approximate lengths.
- xvi. On- and off-ROW temporary and permanent access roads, parking areas, lay-down areas and work pads, including an indication of provisions for upgrading any existing access.
- xvii. Any required temporary or permanent grading associated with access roads, work areas and any other grade alterations.
- xviii. Construction contract limit lines, property lines, designated floodways and flood-hazard area limits, buildings, sheds, relocated structures, and any plans for water service, sewage and waste disposal.
- xix. Construction type, material, dimensions, and listing of any standards applied to construction of access roads.
- xx. Limits of Disturbance for the proposed major electric transmission facility, including areas requiring temporary clearing needed for construction, including language referencing danger tree provisions/rights.
- xxi. For existing utility and non-utility facilities that will be acquired or require removal or relocation, indicate methods of removal of existing facilities, and show the new locations, types and configurations of relocated facilities.
- xxii. Location of the major electric transmission facility relative to nearby fence lines, roads, trails, railways, airfields, hedgerows, surface waters, wetlands, streams, other water bodies, significant and unique habitats, associated facilities, nearby buildings or structures, areas assessed to contain cultural resources, major antennas, areas of known or suspected contamination or hazardous materials, oil, gas, and potable water wells, and major utility infrastructure.
- xxiii. The location and details of any proposed new or expanded switchyard, substation, converter station, or other terminal or associated utility or non-utility structure.
- xxiv. Type(s) of outdoor lighting, including design features to avoid off-site illumination and minimize glare, and the color and finish of all structures.
- xxv. The location and boundaries of any on- or off-ROW areas proposed to be used for fabrication, designated equipment parking, staging, access, lay-down, and conductor pulling.
- xxvi. Any planned fencing, surface improvements, and screening of storage and staging areas.
- xxvii. The location of any petroleum or chemical storage and secondary containment areas including those areas for fueling equipment and machinery.
- xxviii. The locations for ready-mix concrete or flowable fill chute washout and any other cleaning activities.

- xxix. Location of any proposed temporary concrete batch plant(s) related to facility construction.
- xxx. Location of any proposed marshalling yards.
- xxxi. Locations of all temporary and permanent stormwater management controls that are developed in accordance with the latest version of the New York State Stormwater Management Design Manual and required based on site-specific conditions or conditions of the Certificate. Include the dimensions, material specifications and installation details for each post-construction stormwater management practice.
- xxxii. Additional requirements for in-water cables:
 - 1. Federal navigation channel locations;
 - 2. Co-located infrastructure and crossing locations;
 - 3. Bridges, piers, and other marine infrastructure;
 - 4. Location of landfall and associated infrastructure (e.g., exit point, transition joint bay, etc.);
 - 5. Defined bathymetry contours within the facility siting corridor;
 - 6. Splice locations;
 - 7. Locations of known significant fish and wildlife habitat; RTE species or habitat; Recognized Ecological Complexes; cold-water corals; shellfish, and artificial reefs; and any other exclusion zones;
 - 8. Locations of Federal Aids to Navigation (ATONs);
 - 9. Locations of Unexploded Ordinances (UXOs);
 - 10. Locations of proposed cable protection measures;
 - 11. Anchorage areas and anchor avoidance areas;
 - 12. Areas of any temporary in-water closures needed during HDD and in-water preparation or construction; and
 - 13. Locations of any proposed sand wave leveling.

NG Response III.B.1.i. through III.B.1.iv: In creating the Plan and Profile drawings for this EM&CP, National Grid has included all applicable information as required by the Specifications for Development of Environmental Management and Construction Plan for Case 25-T-0184, included as Appendix E to the Joint Proposal, in the drawings presented in Appendix A. Appropriate indexes, legend, contour lines, and stationing are shown within the drawings. Contour lines are shown as one (1) foot intervals and each independent circuit has stationing depicted on the plan view that coincides with that circuit's respective profile view.

NG Response III.B.1.v: Sheets 4 through 9 of Appendix A contain pertinent construction notes that provide information to the contractor including, but not limited to, drawing set format, general construction notes, clearing and slash disposal procedures, off-ROW access roads, general erosion and sediment control, general agriculture, SWPPP notes, seeding and stabilization notes and soil restoration.

NG Response III.B.1.vi: The table in Appendix B identifies the property rights that are to be acquired for the Project. New easements of the following types can be found in NG Response III.A.1.

NG Response III.B.1.vii: No conductor splices are proposed for this Project. Pull pad locations are found in Appendix N.

NG Response III.B.1.viii: A table showing co-located infrastructure information, including owner information, station location of proposed crossings, and agreement status is included in Appendix B.

NG Response III.B.1.ix: The boundaries of any new, existing and/or expanded ROW or road boundaries and where cables are to be constructed overhead or underground plus areas contiguous to the ROW or street within which National Grid will obtain additional rights are shown on the EM&CP Drawings in Appendix A and discussed in Appendix B. A description of each Project segment and the additional rights required for that respective segment is provided in Response III.B.1 and in Appendix B.

NG Response III.B.1.x: See NG Response III.B.1.vi. All property rights to be acquired to support this project are described in Appendix B along with the status of acquisition.

NG Response III.B.1.xi: For all additional information on host and adjacent property lines and associate landowners, see NG Response III.B.1.vi.

NG Response III.B.1.xii through III.B.1.xiv: These are shown on the EM&CP Drawings in Appendix A. Locations where existing utility and non-utility structures will be removed or relocated are annotated accordingly.

NG Response III.B.1.xv: No trenchless and in-water installation locations are proposed for the Project.

NG Response III.B.1.xvi: The locations and dimensions of all temporary and permanent on and off- ROW access roads, parking areas, lay-down areas and work pads along with information regarding construction type, material and provisions for upgrading any existing access roads are shown on the EM&CP Drawings in Appendix A. The locations of all off-ROW access roads are provided in Table N-1 in Appendix N.

NG Response III.B.1.xvii: The locations and details of any required temporary or permanent grading associated with access roads, work areas and any other grade alterations are shown on the EM&CP Drawings in Appendix A, and Appendix Z, Grading Plans.

NG Response III.B.1.xviii: Construction contract limit lines and property lines are shown on the EM&CP Drawings in Appendix A. The Project ROW crosses “AE” flood zones associated with the Oneida River and Black River and “A” flood zones associated with the Salmon River, Little Bay Creek, Shanty Creek, Dykeman Creek, South and North Branches of Grindstone Creek, South and North Branches of the Little Salmon River, and several unnamed tributaries. “AE” flood zones are 100-year flood inundation areas for which Base Flood Elevations have been determined. “A” flood zones are 100-year flood

inundation areas for which Base Flood Elevations have not been determined. The remainder of the Project ROW is within Zone X, or minimal risk zone.

The new structures proposed to be constructed for the Project will not have an impact on the floodplain as they will not appreciably change elevation or significantly impact existing contours. Environmental protection measures such as the use of temporary timber mats will be used as necessary during construction to protect wetlands and associated floodplain areas. Protection measures will be determined on a site by site basis.

Information regarding construction contract limit lines, property lines, designated floodways and flood-hazard area limits, buildings, sheds, relocated structures, and any plans for water service, sewage and waste disposal is contained in Appendices A and G.

NG Response III.B.1.xix: See NG Response III.B.1.xvi.

NG Response III.B.1.xx: *The limits of disturbance (LOD) of the transmission line project are represented on the EM&CP Drawings in Appendix A. Any limits of disturbance of the substation portion of the project will fall within the LOD defined on the Plan and Profile drawings. Any areas to be cleared temporarily will be within the LOD as represented. Any additional rights required for danger trees will be so annotated.*

NG Response III.B.1.xxi: *Existing utility and non-utility facilities are shown on the EM&CP drawings in Appendix A.*

NG Response III.B.1.xxii: *The location of the Facility in relationship to nearby fence lines, roads, trails, railways, hedgerows, surface waters, wetlands, streams, other water bodies, significant and unique habitats, associated facilities, nearby buildings or structures, areas assessed to contain cultural resources, and major utility infrastructure is shown on the EM&CP Drawings in Appendix A. There are no oil or gas wells or blowdown valves, airfields, major antennas, or areas of known or suspected contamination or hazardous materials in the Project area.*

NG Response III.B.1.xxiii: *The location of substations, and associated terminals are shown on the EM&CP drawings in Appendix A.*

NG Response III.B.1.xxiv: *With the exception of temporary lighting proposed at the marshalling yards and outdoor lighting at the Staplin Creek Substation (substation lighting details are provided in the Staplin Creek Substation EM&CP), no type(s) of outdoor lighting is proposed for the transmission line.*

NG Response III.B.1.xxv and xxvi:

1. *The location and boundaries of any on- or off-ROW areas proposed to be used for fabrication, designated equipment parking, staging, access, lay-down, and conductor pulling is shown on the EM&CP Drawings in Appendix A.*

2. Any planned fencing, surface improvements, and staging areas is shown on the EM&CP Drawings in Appendix A, Appendix H of the Joint Proposal, and Appendix AH of this EM&CP (relating to marshalling yards). No additional screening of the marshalling or staging areas is planned.

NG Response III.B.1.xxvii: Details regarding fuel and chemical handling procedures are attached to this EM&CP. In addition, a spill response and emergency plan, including the NYSDEC spill reporting contact number are contain in Appendix V. This plan provides methods of handling spills of petroleum products and any hazardous or controlled substance which may be stored or utilized during construction, operation, or maintenance of the Project.

NG Response III.B.1.xxviii: Concrete washout locations will be in general locations where foundations are to be installed and installed per the Blue Book Standards. Concrete truck washout areas shall be located a minimum of 100 feet away from any wetland or waterbody.

NG Response III.B.1.xxix: No temporary concrete batch plant(s) related to facility construction are proposed.

NG Response III.B.1.xxxi: The locations of all temporary and permanent erosion and sediment controls designed for installation on the ROW are shown on the EM&CP Drawings in Appendix A. Typical details, conforming to Blue Book standards, for these controls are located on Sheets 10 through 16 of Appendix A and the Project SWPPP (Appendix G). While these controls are shown on the drawings, implementation and final location of the installation will be completed in consultation with the on-site Environmental Monitor and field conditions and may vary from what is shown on the drawings.

NG Response III.B.1.xxx: The location of additional marshalling yards is depicted in Appendix AH.

NG Response III.B.1.xxxi: Temporary and permanent stormwater management controls are contained in the Applicants SWPPP, which is contained in Appendix G.

NG Response III.B.xxxii: The installation of in-water cables is not anticipated as part of the Project.

2. Vegetation Clearing and Disposal Plans

Identify on the plan drawings:

- i. Locations of sites requiring clearing of vegetation related to the facility, including areas to be temporarily utilized during construction and the geographic limits of such clearing including danger trees;

- ii. Specific methods for the type and manner of cutting and disposition or disposal method for cut vegetation, including areas where property owners request specific methods;
- iii. Methods for management of vegetation to be cut or removed at each site;
- iv. Any geographical area bounded by distinctly different cover types requiring different cut-vegetation management methods including areas requiring distinctly different cut-vegetation methods due to site conditions such as land use differences, population density, habitat or site protection, soil or terrain conditions, fire hazards, or other factors; and
- v. Location of any areas where specific vegetation protection measures will be employed and the details of those measures to avoid damage to specimen tree stands of desirable species, important screening trees, or hedgerows.

NG Response III.B.2: *See Plan & Profile drawings contained in Appendix A for the information required above.*

3. Stormwater Management and Erosion Controls

Plan views shall show specific controls to divert stormwater, minimize erosion, and prevent sediment transport beyond the limits of the work area, in a manner that is consistent with the project SWPPP.

NG Response III.B.3: *All erosion and sediment control measures prescribed in the SWPPP are shown on the EM&CP Drawings in Appendix A. A copy of the SWPPP document is provided in Appendix G. All erosion and sediment control practices are in conformance with the technical standards found in the NYS Standards and Specifications for Erosion and Sediment Control (Blue Book) most recently dated November 2016. The Project will be subject to the requirements of a regulated, traditional land use control MS4 in the Village of Central Square and the Towns of Clay, Cicero, Hastings, Rodman, and LeRay. As such, National Grid will seek to have the SWPPP reviewed and the MS4 SWPPP Acceptance form signed by each of the respective municipalities.*

4. Wetlands, Waterbodies, and other Water Resources

On the plan view, indicate:

- i. Locations of wetlands, streams, and other water bodies.
- ii. The name, water quality classification, location, and flow regime of all rivers, streams, and drainages within or adjacent to the facility ROW.
- iii. The location and type of any wetland, delineated locations of wetland boundaries, and the extent of State-regulated wetland Adjacent Areas located within or adjacent to the facility ROW.
- iv. The location of all potable water sources and the precautionary measures to be taken to protect each water source, including springs and wells on the facility ROW or within: (i) 100 feet of the ROW or access roads; (ii) 500 feet of horizontal directional drilling locations; or (iii) 1,000 feet of blasting operations.

- v. The type(s) and location(s) of measures to be taken to protect wetlands and waterbodies.
- vi. The stream and wetland crossing method(s), with reference to the applicable crossing method details/typicals.
- vii. For each new crossing of a “protected stream” and/or “navigable waters of the state”, and streams with species protected under 6 NYCRR Part 182, provide:
 - 1. Detailed plan, profile, and cross-sectional view plans;
 - 2. Drainage area and flow calculations to ensure that the design will safely pass the 1% annual (100-year return) chance storm event; and
 - 3. Location, quantity, and type of fill.
- viii. Designated floodways or flood hazard areas to be traversed by the facility or access roads, or otherwise used for facility construction or the siting of associated facility components.

NG Response III.B.4.i through III.B.4.iii: *All wetlands, streams, and other water bodies (including their name, water quality classification, location, and flow regime), location and type of any wetland, delineated locations of wetland boundaries, and the extent of State-regulated wetland adjacent areas located within or adjacent to the facility ROW are shown on the EM&CP Drawings in Appendix A.*

Field-verified aquatic resources and waterbodies and available floodways data in the form of FEMA 100-year floodplains are shown on the EM&CP Drawings in Appendix A. It should be noted that digital FEMA Flood Hazard data is available for only select areas within Jefferson County, New York, and is not comprehensively depicted on the EM&CP Drawings in Appendix A. Copies of the applicable FIRM panels from non-digital sources were included in Appendix 4, Figure 4-3 of the Article VII application. Streams and waterbodies are keyed into Table C-2 in Appendix C where the waterbody name, water quality classification, water index number, GPS coordinates and proposed crossing method, if applicable, are provided in tabular form.

The location and type of all wetland resources delineated along the ROW and access roads, both on-ROW and off-ROW, are shown on the EM&CP Drawings in Appendix A. The mapped wetland resources are keyed into Table C-1 in Appendix C which summarize the wetland information and provide the details of all activities that will occur in wetlands.

NG Response III.B.4.iv: *National Grid reviewed resources published by the NYSDEC Bureau of Water Resource Management for known locations of potable water sources to obtain information regarding potable water sources on or near the Facility ROW.*

NG Response III.B.4.v: *All streams and wetlands are considered to have a 100 foot buffer zone on each side which will be marked in the field by the Environmental Monitor prior to construction. Activities restricted in wetlands, waterbodies and buffer zones “Restricted Activities” are as follows:*

- a) *Herbicide application within 100 feet of waterbodies and wetlands shall be performed via low volume foliar spray from backpack sprayer, cut stem and/or*

stump treatment, and basal bark treatment methods consistent with approved treatment methods in the most recent version of the Certificate Holder's vegetation management plan and in conformance with the Certificate.

- b) In general, concrete washout areas shall be located a minimum of 100 feet away from any waterbody or wetland. If the minimum setback is not practicable, siting of the washouts will be at the discretion of the Environmental Monitor.*
- c) Marshalling yards and staging areas constructed on previously undisturbed lands shall not be sited within floodplains, wetlands, state regulated wetland adjacent areas, or within fifty (50) feet of waterbodies or streams.*
- d) All excess fill materials and spoils shall be completely removed to upland areas greater than 100 feet from waterbodies and wetlands.*
- e) Excavated soil material resulting from excavation activities shall not be permanently stored in floodplains within 100 feet of streams, waterbodies or wetlands unless it is temporarily stored on construction mat(s) underlaid with geotextile fabric and surrounded by silt sock so the soil is properly contained to prevent runoff into such areas.*
- f) Stationary fuel tanks and hazardous chemical storage shall be a minimum of 100 feet from streams, waterbodies and wetlands and shall include adequate secondary containment (containing at least 110% of the volume stored).*
- g) Contractors will take precautions to prevent spillage of any petroleum or chemicals and will not store, mix, or load these materials within 100 feet of any waterbodies or wetlands.*
- h) Dewatering operations from any construction related activities will be discharged into an approved dewatering device (i.e., temporary sediment trap or filter bag).*
- i) Pumps used for trench dewatering or dam and pump crossings operating within 100 feet of a water body or wetland will be placed in properly sized and temporary secondary containment structures during their use.*
- j) All equipment operating within 100 feet of a waterbody, wetland, or rare plant or unique natural community will have sufficient spill-containment equipment (including spill kits) on board to provide for prompt control and cleanup in the event of a release.*
- k) Equipment refueling, maintenance, and repair shall be conducted a minimum of 100 feet away from any waterbody or wetland to the maximum extent practicable, except that the refueling of hand equipment (e.g. chainsaws), cranes and drill rigs may be allowed within 100 feet of wetlands or streams under the following conditions:*
 - i. Refueling of hand equipment will be allowed within 100 feet of wetlands or streams when secondary containment is used. Secondary containment will be constructed of an impervious material capable of holding the hand equipment to be refueled and at least 110% of the fuel storage container capacity. Fuel tanks of hand-held equipment will be initially filled in an upland location greater than 100 feet from wetlands or streams in order to minimize the amount of refueling within these sensitive areas. Crews shall have sufficient spill containment equipment on hand at the secondary containment location to provide prompt control and cleanup in the event of a release. Crews will keep*

- the Environmental Monitor informed that this procedure is being used and will immediately report any spill to the Environmental Monitor.*
- ii. *Refueling of cranes and drill rigs will be allowed within 100 feet of wetlands or streams when necessary to maintain continuous operations and where removing equipment from a sensitive area for refueling would increase adverse impacts to the sensitive area. Fuel tanks of such equipment will be initially filled in an upland location greater than 100 feet from wetlands or streams in order to minimize the amount of refueling within these sensitive areas. All refueling of cranes or drill rigs within 100 feet of wetlands or streams will be conducted under the direct supervision of the Environmental Monitor. Absorbent pads or portable basins will be deployed under the refueling operation. In addition, the fuel nozzle will be wrapped in an absorbent pad and the nozzle will be placed in a secondary containment vessel (e.g., bucket) when moving the nozzle from the fuel truck to the equipment to be refueled. All equipment operating within 100 feet of a wetland or stream shall have sufficient spill containment equipment on board to provide prompt control and cleanup in the event of a release.*

NG Response III.B.4.vi and III.B.4.vii: *All methodology for crossing streams and waterways are outlined in the typical details found within the EM&CP Drawings in Appendix A, and crossing methodology is captured in tabular form in Table C-2, in Appendix C.*

NG Response III.B.4.vii: *See above.*

NG Response III.B.4.viii: *Per FEMA Flood Hazard Area Mapping, the Project ROW crosses “AE” flood zones associated with the Oneida River and Black River and “A” flood zones associated with the Salmon River, Little Bay Creek, Shanty Creek, Dykeman Creek, South and North Branches of Grindstone Creek, South and North Branches of the Little Salmon River, and several unnamed tributaries. “AE” flood zones are 100-year flood inundation areas for which Base Flood Elevations have been determined. “A” flood zones are 100-year flood inundation areas for which Base Flood Elevations have not been determined. The remainder of the Project ROW is within Zone X, or minimal risk zone. There are no other designated or mapped floodways or flood hazard areas to be traversed by the facility or access roads or otherwise used for facility construction or the siting of associated facility components. The structures within the flood plain areas will not meaningfully alter existing elevations or impact significant contours. Construction mats or other appropriate environmental protection measures will be used as necessary to protect floodplains and adjacent sensitive areas from sedimentation and erosion.*

5. Agricultural Areas

On the plan view, indicate:

- i. *Locations of sites under cultivation or in active agricultural use, including rotational pasture, pasture, hayland, and cropland.*

- ii. Locations of NYS certified Agricultural Districts and Mineral Soil Groups 1-4.
- iii. Locations of any unique agricultural lands including maple sugarbushes, muckland and other organic farmland, and permanent irrigation systems, as well as areas used to produce specialty crops.
- iv. Locations of vulnerable soils in agricultural areas that are sensitive to construction disturbance due to slope, soil wetness, and shallow depth to bedrock.
- v. Location of all land and water management features, including subsurface drainage facilities, surface drainage, diversion terraces, buried water lines, and water supplies.
- vi. Site-specific techniques to be implemented to minimize construction-related impacts to agricultural resources.

NG Response III.B.5.i: *The location of sites under cultivation or in active agricultural use are noted on the Project Drawings in Appendix A and shown on Appendix D. Specific agricultural use, including rotational pasture, pasture, hayland, and cropland are noted on the Project Drawings in Appendix A.*

NG Response III.B.5.ii: *The locations of NYS certified Agricultural Districts and Mineral Soil Groups 1-4 are provided in Appendix D.*

NG Response III.B.5.iii: *The locations of non-commercial maple sugarbushes are noted on the Project Drawings in Appendix A.*

NG Response III.B.5.iv: *The following vulnerable soils are identified in agricultural areas that are sensitive to construction disturbance due to slope, soil wetness, and shallow depth to bedrock:*

- *Alton cobbly silt loam, rolling*
- *Alton gravelly fine sandy loam, rolling*
- *Brockport silty clay loam, 0 to 6 percent slopes*
- *Canandaigua silt loam*
- *Colton-Hinckley complex, moderately steep*
- *Colton-Hinckley complex, rolling*
- *Colton-Hinckley complex, steep*
- *Farmington loam, 0 to 8 percent slopes*
- *Fluvaquents and Udifluvents, frequently flooded*
- *Fredon gravelly fine sandy loam*
- *Galway silt loam, 3 to 8 percent slopes*
- *Galway very stony silt loam, 0 to 15 percent slopes*
- *Groton gravelly loam, 15 to 25 percent slopes*
- *Groton gravelly loam, 8 to 15 percent slopes*
- *Groton variant gravelly loam, 0 to 8 percent slopes*
- *Halsey gravelly loam*
- *Humaquepts and Fibrists, ponded*
- *Ira-Sodus gravelly fine sandy loams, rolling*

- *Ira and Sodus very stony soils, moderately steep*
- *Junius loamy fine sand*
- *Lamson fine sandy loam*
- *Lamson very fine sandy loam*
- *Minoa very fine sandy loam*
- *Naumburg-Duane complex, gently sloping*
- *Naumburg-Granby complex, gently sloping*
- *Naumburg loamy fine sand*
- *Nellis and Madrid soils, 25 to 50 percent slopes*
- *Plainfield and Windsor soils, hilly*
- *Raynham silt loam, 0 to 6 percent slopes*
- *Rhinebeck silt loam, 0 to 2 percent slopes*
- *Rifle muck*
- *Scriba gravelly fine sandy loam, 0 to 8 percent slopes*
- *Scriba very stony soils, gently sloping*
- *Sodus gravelly fine sandy loam, 8 to 15 percent slopes*
- *Sun loam*
- *Worth and Empeyville soils, 8 to 15 percent slopes, very stony*

Appendix D includes a figure showing vulnerable soils that cross the Project.

NG Response III.B.5.v: *There are no known land and water management features, including subsurface drainage facilities, surface drainage, diversion terraces, buried water lines, and water supplies on the Project ROW.*

NG Response III.B.5.vi: *The location of site-specific techniques to be implemented to minimize construction-related impacts to agricultural resources are provided on the Project Drawings in Appendix A, and the SWPPP in Appendix G.*

6. Sensitive Land Uses and Resources

Indicate the location and identification of sensitive land uses and resources that may be affected by construction of the facility or by construction-related traffic.

NG Response III.B.6: *The location of sensitive land uses and resources that may be affected by construction of the Facility or by construction-related traffic (e.g., hospitals, emergency services, sanctuaries, schools, and residential areas) are shown on the EM&CP Drawings in Appendix A. The areas identified include the following:*

Sensitive Land Uses	
Land Use	Name
Community Services	Valerie Meyers NP- Northern Family Care
Community Services	Highland Animal Hospital
Community Services	Central Square Little League Fields

Sensitive Land Uses	
Land Use	Name
Community Services	CNY Chapter NRHS-Central Square Museum
Recreation and Entertainment	Chateaugay State Forest
Recreation and Entertainment	Little John Wildlife Management Area
Recreation and Entertainment	Lower Salmon River State Forest
Recreation and Entertainment	Tug Hill State Forest
Recreation and Entertainment	Winona State Forest
Residential	See Appendix A and Appendix E, Table E-3 for Residences within 100 ft of the ROW

7. Cultural and Scenic Resources

Indicate the locations of cultural and scenic resources and specify measures to minimize impacts to these resources.

NG Response III.B.7: *The location of cultural and scenic resources are located in the Cultural Resources Avoidance, Minimization and Mitigation Plan is provided in Appendix AG. On June 10, 2024, OPRHP issued a letter confirming that the Project would have no effect on historic properties. On August 8, 2024, OPRHP issued a letter indicating that no properties, including archaeological and/or historic resources, listed in or eligible for the NRHP/SRHP will be impacted by this project. An additional Phase 1A and Phase 1B archaeological evaluation was recently conducted along several additional work areas and access routes not covered by previous surveys in May 2026. The results of these evaluations were submitted to SHPO in July 2026 in order to receive concurrence that no further study is necessary and the project will have no effect on archaeological resources. A response from SHPO regarding the July 2026 submission was pending as of the date of issue of this EM&CP. Consultation documents with SHPO are included in Agency Correspondence in Appendix H.*

8. Recreational

Indicate the locations where recreational use areas would affect or be affected by the facility location, construction or other ROW preparation.

NG Response III.B.8: *The Project ROW crosses four state forests and one wildlife management areas. Four of these (Chateaugay State Forest, Little John Wildlife Management Area, Lower Salmon River State Forest, and Winona State Forest) are located in Oswego County; Tug Hill State Forest is located in Jefferson County.*

Approximately 12.01 miles and 177.61 acres of the Project ROW fall within state-owned lands. Locations of each of these crossings are listed in the following table.

Recreational Use Areas							
Name of State Forest	County	DEC Region	Location (Existing Structures)	Location (Proposed Lines and structures)	Estimated Distance (feet)	Estimated Distance (miles)	Approx. Acreage (150' ROW)
Chateaugay State Forest	Oswego	7	276-299	Line 5: 246-270; Line 6: 246-270	13,811	2.62	31.63
Little John WMA	Oswego	7	194-208	Line 5: 179-183; Line 6: 179-183	8,403	1.59	15.48
Lower Salmon River State Forest	Oswego	7	310-321; 428-438; 28-36	Line 5: 283-305; Line 6: 283-305; Line 17: 3-9; Line 27: 3-9	14,789	2.8	42.45
Tug Hill State Forest	Jefferson	6	98-131; 142-153	Line 5: 57-93; 106-117; Line 6: 57-93; 106-117	24,438	4.63	83.91
Winona State Forest	Oswego	6	211-215	Line 5: 179-183; Line 6: 179-183	2,248	0.43	4.14
Totals					63,689	12.07	177.61

The Certificate Holder will implement appropriate construction safety practices, such as temporary barricades and fencing, to prevent recreators from entering construction work zones and avoid potential conflicts. Recreational resources are shown on the Plan & Profile drawings in Appendix A and discussed in detail in Exhibit 4 of the Application.

9. Noise Sensitive Sites

Show the locations of noise-sensitive areas within and adjacent to the facility corridor.

NG Response III.B.9: *Noise-sensitive areas are generally considered to be residential dwellings, residential developments, commercial businesses and institutional establishments (schools, churches, hospitals) located near the Project ROW. Table E-3 in Appendix E provides a list of all residences/buildings within 100 feet of the Project ROW. Information regarding noise mitigation can be found in Appendix E and in Response III.A.11 of this EM&CP. Notes regarding normal work hours (7:00 am to 7:00 pm Monday through Saturday) have been placed on the Plan and Profile drawings.*

10. Ecologically and Environmentally Sensitive Areas

- i. Indicate the locations of any known culturally and environmentally sensitive sites within or adjacent to the facility ROW or along the general alignment of any access roads to be constructed, improved or maintained for the facility. Specify the measures that will be taken to protect these resources. Such areas shall be delineated and labeled as “Environmentally Sensitive Areas, No Access” on the plans.

- ii. Protected native plants stands shall be identified in the plan view drawings, which shall note any such locations where the landowner has given permission for the removal of such protected native plants.
- iii. Locations of construction fencing to restrict access to ecologically and environmentally sensitive areas during construction, including locations of protected native plants.

NG Response III.B.10.i: See Appendix AD, the Applicant's CRAMMP. An Unanticipated Discovery Plan is included in Appendix AD.

NG Response III.B.10.ii: Protected native plants were not identified within or adjacent to the facility ROW.

NG Response III.B.10.iii: Ecologically and environmentally sensitive areas were not identified within or adjacent to the facility ROW.

11. Invasive Species

Identify the location(s) of invasive species known or identified within or adjacent to the facility ROW and measures to minimize the spread, expansion, and introduction of invasive species.

NG Response III.B.11: An Invasive Species Management Plan (ISMP) prepared in consultation with DPS Staff, NYSDEC and NYSDAM can be found in Appendix M.

12. Herbicides

On the plan view and in the construction notes, indicate areas where herbicides will not be used.

NG Response III.B.12: Herbicides will not be used on properties with negotiated chemical restrictions or in "buffer zones" as described in Response III.A.14. Certificate Condition 73 include additional restrictions regarding the use of herbicides. Procedures for herbicide use and a list of herbicides that may be utilized during clearing and construction activities can be found in Appendix L.

13. Profiles

Profile View, at an appropriate scale, to be included with relevant plan sheet, showing or otherwise including:

- i. The lowest conductor of an overhead design shall be shown in relation to the ground at the maximum permissible conductor temperature for which the line is designed to operate (i.e., normally the short-time emergency loading temperature). If a lesser conductor temperature is used for the line profile, the maximum sag

- increase between the conductor temperature and the maximum conductor temperature shall be indicated for each ruling span.
- ii. For underground project design, show relation of the facility to final surface grade, indicating design depth-of-cover.
 - iii. Existing surface grade (ground elevation) along the facility route.
 - iv. Stationing that matches the related plan view on that sheet. Stationing shall be continuous from beginning of the major electric transmission facility to its end.
 - v. All components of the facility and corresponding elevations shown above or below the existing surface grade.
 - vi. Existing utility or non-utility structures and related elevations within the ROW and indicate those to be removed or relocated.
 - vii. Include circuit arrangements where new structures will accommodate existing circuits, indicate methods of removal of existing facilities, and show the new locations, types and configurations of relocated facilities.
 - viii. Proposed trenchless installations and waterbody crossing locations, elevations of proposed cables, and direction of cable pull, including the approximate lengths of such routes.

NG Response: III.B.13.i through III.B.13.viii: National Grid will comply. All of the information requested is provided in the Plan and Profile Drawings in Appendix A.

14. In-Water Transmission Facility Profiles

For in-water cables, provide installation requirements shown on profiles, including related elevations, including:

- i. Existing Surface Water Level.
- ii. Present sediment surface.
- iii. Proposed in-water route of major electric transmission facility shown at target burial depth.
- iv. Federal navigation channel and proposed separation between the bottom of the channel and proposed target burial depth.
- v. Co-located infrastructure and crossing locations.
- vi. Locations of cable protection measures.
- vii. Bridges, piers, and other marine infrastructure.
- viii. Location of landfall and associated infrastructure.
- ix. Splice locations.
- x. Locations of ATONs.
- xi. Anchorage areas and anchor avoidance areas.
- xii. Locations of any proposed sand wave leveling.

NG Response III.B.14.i through III.B.14.ii: There are no in-water transmission facilities included in this Project.

15. Typical Details and Elevation Requirements

Provide the following typical details and elevation requirements for the final facility design and construction:

- i. Typical underground infrastructure section details with dimensions of proposed depth, trench width, level of cover, separation requirements between circuits/cables, clearing width limits for construction and operation of the facility, limits of disturbance, required permanent ROW, and a description of the cable installation processes.
- ii. Details for typical tower foundations.
- iii. Typical details of any proposed vaults, including vault dimensions, level of cover, clearing limits for construction and operation of the facility, and limits of disturbance for installation.
- iv. Details for typical overhead electric transmission lines, including a profile of the centerlines at an exaggerated vertical scale and typical elevation views including height above grade and structure layouts.
- v. Details for typical overhead structures, guy anchors, buildings, and any proposed equipment foundations including plan and section information. If multiple foundation designs are to be utilized for the facility, specify the foundation type at each location on the foundation plans, either listed in a table or indicated on corresponding plans.
- vi. Typical detail drawings for switchyards, substation, converter stations other buildings and interconnection facilities, including fencing, gates, and station equipment and infrastructure, which shall include:
 1. the length, width, height, material of construction, color, and finish of all buildings, structures, conductors, insulators, and other fixed equipment; and
 2. a 'general arrangements' drawing showing elevation mark pointers with reference to associated elevation views, including views of all components of the station.
- vii. For each proposed permanent point of access or access type, a typical installation plan view, cross section, and side view with appropriate dimensions, including temporary and permanent widths, and identification of materials to be used along with corresponding material thickness.
 1. Provide diagrams and specifications (include plan and side views with appropriate typical dimensions) for each erosion control feature to be used for access roads.
 2. Provide diagrams and specifications (include plan and side view with appropriate dimensions) for each type of access road stream crossing method.
- viii. Typical details of any other proposed access (e.g., helicopter or barge placement).
- ix. Typical details of any proposed agricultural resource protection measures.
- x. Manufacturer-provided information regarding the design, safety and testing information for associated components of the facility including but not limited to inverters, transformers, cables and conductors, circuit breaker, relay protection and communication system to be installed, or as related to the transmission facility for operation.

NG Response: III.B.15.: *All of the required information (except as it relates to underground facilities or substations [none involved in this Project]) is provided in the drawings included in Appendix A. In addition, see Appendices AA (transmission structure drawings) and AB (transmission hardware drawings).*

For example, typical detail drawings, cross sections and additional details for proposed substation infrastructure related to the project, including fencing, gates, and station equipment and infrastructure, including the length, width, height, material of construction, color, and finish of all buildings, structures, conductors, insulators, and other fixed equipment; and a 'general arrangements' drawing showing elevation mark pointers with reference to associated elevation views, including views of all components of the station are found in the EM&CP Drawings in Appendix A.

C. ADDITIONAL PLANS AND APPENDICES

Section C of the EM&CP shall include additional plans and appendices required by the Certificate or otherwise proposed by the Certificate Holder. Examples of such plans and appendices include:

1. Quality Assurance and Control Plan

A Quality Assurance and Control Plan, which shall include:

- i. Job titles and qualifications necessary, demonstrating how the Certificate Holder will monitor and assure conformance of facility design, engineering and installation, including general concrete testing procedures with a plan outlining the monitoring and testing of concrete procedures in conformance with and reference to all applicable codes and standards.
- ii. The frequency with which the Quality Control Audits will be performed.
- iii. Description of how the Certificate Holder will ensure that the transmission line structures and components it purchases conform to the specification for structures and components described in the EM&CP.

NG Response III.C.1: *National Grid has developed a Material Quality Control and Quality Assurance plan, which can be found in Appendix U.*

2. Emergency Response Plan

Describe emergency response procedures for construction and operation of the facility.

NG Response III.C.2: *National Grid's Emergency Response Plan is contained in Appendix AF.*

3. Highway Work Plan

A Highway Work Plan prepared in compliance with 17 NYCRR Part 131; NYSDOT Highway Design Manual Chapter 13 and its Appendices A – C; NYSDOT Highway Design Manual Chapter 5, Appendix A; NYSDOT Blue Book; and all other applicable permits and approvals, including NYSDOT Highway Work Permits and Use and Occupancy Permits.

NG Response III.C.3: All Traffic Management Plans for the Project are located within Appendix X. Any highway work permits required for the Project can be found in Appendix J or will be added to the Appendix as they are received.

4. Maintenance and Protection of Traffic Plan (Traffic Control Plan)

A Maintenance and Protection of Traffic (MPT) Plan to ensure safety and minimize potential delays to local traffic during construction, which shall describe, at a minimum, the following:

- i. Maps and plans showing final haul routes developed in consultation with DPS Staff, county and municipal highway officials and local school districts. Final haul routes shall be accurately depicted in drawings submitted with the Traffic Control Plan.
- ii. Copies of all necessary transportation Certificates from the affected State, County, and municipal agencies for such equipment and/or materials on such route. Such Certificates shall include but not be limited to: Highway Work Certificates to work within the ROW, Certificates to exceed posted weight limits, Highway Utility Certificates to construct facilities within ROW, Traffic Signal Certificates to work within ROW, Special Haul Certificates for oversize/overweight vehicles, and Divisible Load overweight Certificates.
- iii. Copies of all necessary agreements with utility companies for raising or relocating overhead wires where necessary to accommodate the oversize/overweight delivery vehicles, if applicable.
- iv. A copy of all road use and restoration agreements, if any, between the Certificate Holder and landowners, municipalities, or other entities, regarding repair of local roads damaged by heavy equipment, construction or maintenance activities during construction and operation of the facility.
- v. Confirmation that:
 1. Signage utilized at State highways shall comply with the New York State Department of Transportation (“NYSDOT”) Manual of Uniform Traffic Control Devices;
 2. Placement of signs shall be determined in consultation with the jurisdictional agency;
 3. Flaggers or an electronic traffic device in lieu of a flagger shall be present when equipment is crossing any public road, when equipment is being loaded or unloaded from a vehicle parked on a public road, and where multiple-lane traffic has been reduced to less lane(s); and

4. Spotters assigned to ensure the safe operation of heavy equipment shall be utilized where necessary and appropriate.
- vi. If applicable, the MPT Plan shall include a Work Zone Traffic Control (WZTC) plan that identifies procedures to be used to maintain traffic and provide a safe construction zone for those activities within the roadway ROW.
 1. WZTC plans shall also be provided for each location where construction vehicles will access the project ROW from the local roadway.
 2. WZTC plans shall address temporary signage, lane closures, placement of temporary barriers, and traffic diversion.
 3. For any proposed traffic detours, specify the duration and notification procedures.

NG Response III.C.4: *Traffic Control Plans associated with the project are located in Appendix X of this EM&CP.*

5. Stormwater Pollution Prevention Plan

Include the SWPPP developed in accordance with the New York Standards and Specifications for Erosion and Sediment Control.

- i. The Certificate Holder shall include NYSDEC's Letter of Authorization under the SPDES General Permit for Stormwater Discharges from Construction Activity and/or the NYSDEC-approved SPDES Individual Permit for the project.

NG Response III.C.5: *A copy of the SWPPP document is provided in Appendix G. Upon receipt of all MS4 approval(s), the Certificate Holder will file a Notice of Intent (included in Appendix H) and provide DPS staff a copy of the Letter of Authorization prior to commencing construction.*

6. Wetland and Stream Delineation Report

A wetland and surface water delineation report including a series of maps identifying the boundaries of all federal, State, and locally jurisdictional wetlands and waterbodies present within the temporary and permanent ROWs as well as those outside the ROWs, which are within 100 feet of any areas to be disturbed. The report shall consist of a description of waterbody and wetland characteristics including wetland classifications and NYS water quality classifications and standards provided in the approved jurisdictional determination, Cowardin wetland classifications, the Fisheries Index Number (FIN) or Waterbody Index Number (WIN), a description of stream flow (perennial, intermittent, or ephemeral), summary of the field data collected, and associated GIS spatial data.

NG Response III.C.6: *See Appendix E of the Article VII Application and the Jurisdictional Determination from NYSDEC included in Appendix G to the Joint Proposal. Regulated wetlands and streams are shown on Appendix A.*

7. Wetland Mitigation Plan (if required)

A Wetland Mitigation Plan, intended to compensate for unavoidable loss of wetland functions and values, which shall include the following:

- i. Proposal to address wetlands mitigation for all permanent impacts to State-regulated wetlands and Federally-regulated wetlands, if prescribed by the Army Corps of Engineers. If such proposal is to prepare a detailed mitigation plan for State regulated wetlands, it shall separately address impacts to each of the wetlands benefits described in ECL § 24-0105(7). Plans shall provide for wetland mitigation in the same watershed to the maximum extent possible.
- ii. Plans to compensate for unavoidable loss of wetland functions and values, including the following:
 1. The creation of compensatory wetlands at appropriate ratios;
 2. A construction timeline for the mitigation activities;
 3. Construction details for meeting all requirements contained in the Certificate conditions;
 4. Agreed-upon performance standards for determining wetland mitigation success;
 5. Provisions for post-construction annual monitoring and reporting for a period of five years after completion of the wetland mitigation; and
 6. Plans for corrective actions after each monitoring period to implement corrective actions for any areas that do not meet the required performance standards in order to increase the likelihood of meeting the performance standards after five years.

NG Response III.C.7: *A wetland mitigation plan will be proposed within 6 months of the start of construction and, as required under Condition 100, National Grid will work with NYSDEC to develop and finalize its plan.*

8. Stream Crossing Plan

A site-specific Stream Crossing Plan shall be provided for all stream crossings using trenchless crossing methods. Each site-specific Stream Crossing Plan must be prepared and stamped by a qualified engineer licensed to work in New York State and must be approved by NYSDEC before construction begins on the project. For each proposed trenchless crossing location, the Stream Crossing Plan must include:

- i. Detailed engineering plans with plan views and cross sections that contains the stream channel, pipe locations, pipe diameter, locations of boring pits, pullback areas, laydown areas, areas of vegetative clearing/cutting, erosion and sediment control measures, and dewatering wells (if necessary).
- ii. Geotechnical data characterizing the soils for the entire depth profile of the crossing within the pipeline trajectory.

- iii. A site-specific analysis of the potential for inadvertent returns or frac-outs, including but not limited to, an evaluation of soil strength to resist drilling fluid pressure, and the likelihood to maintain borehole stability.
- iv. A site-specific analysis of the appropriate depth of pipe beneath the waterbody to assure sufficient cover is provided considering the potential for vertical and horizontal movement of the streambed. This analysis should account for the Vertical Adjustment Potential (VAP), or lower VAP line, at the point of the stream crossing. This analysis should also consider scour associated with 0.2 percent chance flow events anticipated over the life of the facility, including an appropriate design flow multiplier to account for future flows given a changing climate.

NG Response III.C.8: No permanent stream crossings are anticipated as part of the Project. If a stream crossing becomes necessary, National Grid will comply with this provision and use a bridge.

9. Inadvertent Returns Plan

A site-specific plan to address inadvertent returns or frac-outs that occur within wetlands and waterbodies that includes dedicated equipment and staff on site during active directional drilling as well as identification of downstream access points to immediately collect inadvertently returned materials released into the wetland or waterbody and halt additional spread.

- i. The plan shall establish procedures for notifying DPS Staff and NYSDEC of any inadvertent returns or other releases of inadvertently returned materials within 24 hours.
- ii. The plan shall include:
 - 1. Detailed work plans, including plan views that include drilling location, bore length and depth, bore pipe specs, number and diameter of back reams, hole volume, and all equipment used for horizontal directional drilling (HDD);
 - 2. Description of the HDD site including physical characteristics, water supply, existing utilities and environmental resources (e.g., sensitive habitats, wetlands and waterbodies);
 - 3. Alternative crossing methods in the event HDD is unsuccessful; and
 - 4. Protocols for restoration of sites where inadvertent returns have occurred.

NG Response III.C.9: No horizontal directional drilling is planned for this Project so an Inadvertent Returns Plan is not necessary.

10. Drilling Fluid Management Plan

A Drilling Fluid Management Plan which includes the following:

1. Drilling Fluid Safety Data Sheet;
2. Description of how drilling fluids will be managed on site, stored, and transported;
3. Description of procedures for disposal of drilling fluids, including plans for characterization of whether drilling fluids constitute hazardous or solid waste, and when such drilling fluids are anticipated to be disposed at an off-site facility, the name and location of any offsite disposal facilities; and
4. Description of how drilling fluids will be neutralized for disposal.

NG Response III.C.10: *No horizontal directional drilling is planned for this Project so a Drilling Fluid Management Plan is not necessary.*

11. Spill Prevention Control and Countermeasures Plan

Provide a plan for the storage, handling, transportation, and disposal of petroleum, fuels, oil, chemicals, hazardous substances, and other potentially harmful substances which may be used during, or in connection with, the construction, operation, or maintenance of the Facility.

- i. Address how to avoid spills and improper storage or application in the vicinity of any wetland, river, creek, stream, lake, reservoir, spring, well, or other ecologically sensitive site, or existing recreational area along the ROW and access roads;
- ii. Describe procedures for responding to and remediating the effects of any spill of petroleum, fuels, oil, chemicals, hazardous substances, and other potentially harmful substances in accordance with applicable State and Federal laws, regulations, and guidance; and
- iii. Describe the consultation that has occurred between the applicant and agencies, landowners and other local municipalities to determine the location of any springs or wells along the project route. Confirmation that refueling and/or storage of hazardous materials will not take place within 100 feet of any private water or municipal water well.

NG Response III.C.11: *Information regarding spills and spill response can be found in Appendix V.*

12. Dewatering Plan

Provide a Dewatering Plan for onshore temporary dewatering operations associated with project construction that includes:

- i. Plans for discharging water generated from dewatering operations that does not exceed NYSDEC standards, criteria, or guidance values.
- ii. Measures to avoid direct discharges into any wetland, stream, or other waterbody, except where approved in the SPDES Certificate;
- iii. Plans for handling, treatment and disposal of water generated from dewatering operations that exceeds NYSDEC standards, criteria, or guidance values.
- iv. Description of any plans for discharge of effluent from dewatering operations into a municipal sewer system, including:
 - 1. Procedures for prior notification to the municipality, including the timing and expected amount of effluent to be discharged.
 - 2. Confirmation that the Certificate Holder will not discharge effluent from dewatering into any municipal sewer system during periods of precipitation, or when a precipitation event is forecasted to occur within twenty-four hours.

NG Response III.C.12: *A dewatering plan is included in Appendix O of the SWPPP, which is provided in Appendix G.*

13. Geotechnical Engineering Report

Provide a Geotechnical Engineering Report, summarizing the results of geotechnical investigations and analysis completed for final design of the project. The scope of the Geotechnical Engineering Report will be developed in consultation with DPS staff and may include:

- i. The results of any on-site field observations, borings, test pits, and any other geotechnical field investigations for the facility.
- ii. A description of the characteristics and suitability of on-site soils to support underground electrical design, structure foundations, and construction of other facility components.
- iii. Where applicable, a description of the subsurface conditions and/or stratigraphy found at foundation level, including factors such as soil corrosivity (for both steel and concrete), bedrock competence, and subsurface hydrologic characteristics, including at the locations of splice vaults, splice pits, towers, switchyards, substations, converter stations, and other facility components, as appropriate.
- iv. An evaluation of the suitability of subsurface conditions where hydraulic horizontal directional drilling is proposed.
- v. Description of mitigation measures, where recommended based on subsurface conditions.

- vi. Recommendations for construction of access roads and building and equipment foundations including, as applicable:
 - 1. An engineering assessment to determine the types and locations of foundations to be employed and access road design specifications.
 - 2. If piles are to be used, a description and preliminary calculation of the number and length of piles to be driven, the daily and overall total number of hours of pile driving work to be undertaken to construct the facility, and an assessment of pile driving impacts on surrounding properties and structures due to vibration.
 - 3. The identification of mitigation measures regarding pile driving impacts including a plan for securing compensation for damages that may occur due to pile driving.

NG Response III.C.13: Geotechnical reports can be found in Appendix AG.

14. Terrestrial Blasting Plan

Provide a Blasting Plan (if applicable) that includes or otherwise addresses the following:

- i. Provide the results of any pre-blast surveys of any buildings, wells, or other structures within 500 feet of any proposed blasting locations, including, for each survey:
 - 1. Photos depicting the existing structural integrity of the building, well, or other structure; and
 - 2. Written inspection report, signed and dated by the property owner, noting both existing damage to the property and undamaged areas.
- ii. Description of proposed blasting hours, which shall be limited to the hours of 9:00 a.m. to dusk on non-holiday weekdays, unless otherwise approved.
- iii. Description of measures to control flyrock or other airborne debris, which may include rubber tire or woven steel blasting mats.
- iv. Blasting communications protocols describing procedures and timeframes for notifying host communities and adjacent property owners (and the persons residing on such properties, if different) within 1,000 feet of the blasting site. Blasting notifications to host communities and property owners shall occur at least 48 hours before blasting is initiated a specific location and shall specify:
 - 1. blasting locations, procedures, and schedule; and
 - 2. information regarding filing a complaint associated with blasting operations.
- v. Procedures for filing a complaint associated with blasting operations.
- vi. Procedures for post-blasting surveys to assess complaints or reports of blasting impacts on developed properties, including a description of how and when such post-blast surveys will performed, documented, and resolved.

NG Response III.C.14: There is no proposal for blasting associated with the Project. If

blasting becomes necessary, a notice of minor change will be submitted along with a Blasting Plan.

15. Net Conservation Benefit Plan

An executed Net Conservation Benefit Plan that complies with the requirements of 6 NYCRR part 182.11, or proof that the requirement payment was made into the Endangered and Threatened Species Mitigation Bank Fund, if required.

NG Response III.C.15: *It is not anticipated that a Net Conservation Benefit Plan will be required for this Project.*

16. Invasive Species Management and Control Plan

An Invasive Species Control and Management Plan (ISCMP) prepared in compliance with 6 NYCRR Part 575, which shall include the following information:

- i. Baseline mapping of all invasive species within the facility ROW and for 100 feet beyond the facility's LOD, to the extent the Certificate Holder has the required access rights to complete the survey. The baseline mapping and data shall include the relative abundance and distribution of each invasive species prior to the commencement of any construction activities.
- ii. Construction Best Management Practices (BMPs) for the on-site management of invasive species, including:
- iii. Identification of specific control, removal, and disposal measures to be implemented for each identified and mapped invasive species/plant community during construction activities.
- iv. Detailed sequence and schedule for all mechanical and chemical control measures to be implemented during construction activities.
- v. A detailed monitoring plan and specific sampling protocols for each identified and mapped invasive species/plant community within the Facility Corridor and for 100 feet beyond the LOD.
- vi. Identification of specific control contingency measures to be implemented as part of the ISCMP for each identified and mapped invasive species for the duration of the facility adaptive management and monitoring period (i.e., 5 years, unless extended). The ISCMP shall include a detailed sequence and schedule for all contingency mechanical and chemical control measures to be implemented during the monitoring period.
- vii. Specific contingency measures to be implemented to achieve the final site restoration criteria.
- viii. Details regarding the responsible party or parties designated to implement the ISCMP and what financial assurances exist to ensure successful monitoring and ISCMP implementation.
- ix. Plan for post-construction invasive species monitoring, which shall require:
 1. Post construction surveys of:
 2. LOD, both within the ROW and off-ROW areas and access roads;

3. Temporary off-ROW access road areas during the final SWPPP inspections; and
 4. LOD areas, including permanent access roads, after the second full growing season from final SWPPP signoff.
 5. All post-construction surveys shall utilize the same invasive species survey protocols used during the baseline pre-construction survey.
- x. The ISCMP shall include construction Best Management Practices (BMPs) for the on-site management of invasive species, including:
 1. Contractor/subcontractor/employee training on cleaning and other IS management procedures;
 2. Inspection of construction materials and equipment by trained staff;
 3. Minimization of ground disturbance in IS dominated areas;
 4. Proper clearing and disposal practices (i.e., cut and leave in dominated area or dispose off-site in landfill-incinerator or approved disposal site);
 5. Equipment cleaning;
 6. Restoration.
 - xi. The ISCMP shall describe procedures for minimization for invasive species propagation, including but not limited to:
 1. Preparing ROW travel routes to prevent IS spread through contact with equipment/vehicles by any practical combination of matting, IS burial, clean fill cover or IS eradication; and
 2. Providing cleaning stations for equipment/vehicles whenever leaving IS dominated areas along ROW.
 - xii. The initial ISMP will include an Adaptive Management Strategy Plan prepared in consultation with and accepted by DPS, NYSDEC and NYSDAM, and at a minimum, must include the following elements:
 1. A project specific list of Prohibited Invasive Species, generated by NYSDEC in consultation with DPS and NYSDAM, pursuant to 6 NYCRR Part 575 and divided into two sub-lists for which management and control will be required:
 - a. Invasive Species of Special Concern (ISSC), being comprised of Prohibited IS known to be present in the project area and for which NYSDEC has deemed control is necessary such that there is no expansion as defined below. This list will be generated following the results of pre-construction surveys and an analysis of regional threat (e.g., PRISM Tier rankings).
 - b. Invasive Species of High Concern (ISHC), being comprised of invasive species not present in the project area, but which if newly identified in post-construction monitoring, eradication is required. This list will include prohibited invasive species with the highest management concern.
 2. In consultation with DPS, NYSDEC and NYSDAM, a discussion of possible adaptive management strategies and control measures (e.g., eradication) and where and when they may be required if the post-construction survey identifies an expansion of ISSC or ISHC in LOD areas caused by construction. This should include consideration of IS phenology, control

methodology (mechanical techniques, pesticide use etc.) and control objectives.

3. A discussion of conditions that may necessitate additional post construction monitoring and the extent and duration of such extended monitoring considering ongoing long-range vegetative management practices.
- xiii. Upon completion of the post-construction monitoring surveys, if the post construction monitoring report shows the aerial extent of ISSC or ISHC has expanded as defined in the Adaptive Management Strategy as a result of construction of the Project, then DPS, NYSDEC, and NYSDAM will review the final report and DPS, in consultation with NYSDEC and NYSAGM, will determine whether the goals of the post construction monitoring have been achieved or, if applicable, whether a Final Adaptive Management Strategy Plan must be implemented.

NG Response III.C.16: The ISMP associated with the Project is located in Appendix M of this EM&CP.

17. Cultural Resources Avoidance, Minimization and Mitigation Plan

A Cultural Resources Avoidance, Minimization and Mitigation Plan (CRAMMP) for the project, providing:

- i. A narrative summary and demonstration that impacts of construction and operation of the facilities on cultural resources (including archeological sites and historic/above ground resources) will be avoided or minimized to the extent practicable by selection the proposed facility's location, design and/or implementation of identified mitigation measures. At a minimum, the Cultural Resources Avoidance, Minimization and Mitigation Plan shall consist of any approved site avoidance plan, and incorporate any additional avoidance, minimization, or mitigation measures identified by the Office, in consultation with OPRHP.
- ii. A Final Unanticipated Discovery Plan, which shall be updated, as necessary, to include the names, titles, and contact information of individuals within the Certificate Holder's construction organizational structure as referenced within the Plan.
- iii. A Cultural Resources Mitigation and Offset Plan, either as adopted by the Certifying agency in subsequent National Historic Preservation Act (NHPA) section 106 review, or as required by the Office, in consultation with OPRHP, in the event that the NHPA section 106 review does not require that the mitigation plan be implemented. Proof of mitigation funding awards for offset facility implementation to be provided within two (2) years of the start of construction of the facility shall be included.

NG Response III.C.17: A Cultural Resources Avoidance, Minimization and Mitigation Plan is attached as Appendix AD.

18. Visual Impact Minimization and Mitigation Plan

A final Visual Impact Minimization and Mitigation Plan (VIMMP) for the project, including:

- i. Visual design feature requirements;
- ii. Visual contrast minimization and mitigation measures;
- iii. Final Screen Planting Plans, details, specifications, and master plant list.
- iv. Plans for construction period oversight by a qualified landscape architect, arborist, or certified nursery and landscape professional (CNLP), to inspect the screen plantings for two (2) years following installation to identify any plant material that did not survive, appears unhealthy, is damaged, and/or otherwise needs to be replaced.
- v. Plans for removal and replacement of such plant material that fails to provide proper mitigation in workmanship or growth within two years following the completion of the installation of the plantings.
- vi. Long term/operational screen plantings management plans for the inspection and maintenance of plantings for the life of the project, including:
 1. Plans for replacement of plantings where such visual screenings have failed;
 2. Detailed maintenance measures for screen plantings;
 3. Scheduled for regular inspections of plantings throughout the life of the facility; and
 4. Plans for annual screening effectiveness review.

NG Response III.C.18: *In accordance with Certificate Condition 58, an assessment will be completed within one year of construction completion to determine if any additional restoration work or landscape improvements are necessary. If landscape improvements are determined to be necessary following the assessment, a Visual Impact Minimization and Mitigation Plan will be prepared and provided to DPS for review.*

19. Operational Noise Plan

An Operational Noise Plan for the facility, which shall be submitted to DPS Staff for review and comment at least sixty days prior to the start of construction of the substation or converter station, which includes revised sound modeling with the final specifications of equipment selected for construction, any minor or major changes approved for the project, to demonstrate that the project is modeled to meet the sound design goals indicated in the application at any sensitive sound receptor as follows:

- i. For substations other than in the City of New York: Final drawings for the substation, incorporating any changes to the design, including:

1. Location of all noise sources and receptors identified with Geographic Information Systems (GIS) coordinates and GIS files;
 2. Proposed grading and noise source heights and ground elevations;
 3. Site plan and elevation details of substation components as related to the location of all relevant noise sources (e.g. transformers, reactors, filters, HVAC equipment, and gas, diesel or gasoline backup generators, if any);
 4. Identified mitigations, specifications, and appropriate clearances (e.g., for sound walls, barriers, enclosures);
 5. Cut sheets and sound information from the manufacturers for all noise sources (e.g. transformers, reactors, HVAC equipment, emergency generators, if any).
- ii. For converter stations other than in the City of New York: Final drawings for the substation, incorporating any changes to the design, including:
1. Details of proposed noise control features and design requirements to achieve design goals, including prominent tone effects, at noise- sensitive receptor location.
 2. Final drawings for the Converter Station Site, incorporating any changes to the design, including:
 - a. location of all noise sources and receptors identified with Geographic Information Systems (GIS) coordinates in tabular format and GIS digital files;
 - b. proposed grading and noise source heights and ground elevations;
 - c. site plan and elevation details of the Converter Station Site components as related to the location of all relevant noise sources (e.g. Converter station building, transformers, reactors, filters, HVAC and HVDC equipment, and gas, diesel or gasoline backup generators, if any); and
 - d. identified mitigations, specifications, and appropriate clearances (e.g., sound walls, barriers, enclosures, converter hall building walls, low-noise fans).
 3. Sound power level information from the manufacturers. If no manufacturer's information is available, sound information can be based on pre-construction field test(s). The field test(s) will report, at a minimum, measured outdoor sound pressure levels along with clear explanations about how the test was conducted and the sound power levels were obtained.
 4. Derivation of sound power levels for the converter station buildings can also be based upon sound power level information from the manufacturers

for indoor noise sources, building dimensions, interior absorption coefficients, and transmission losses of envelope materials.

5. If no sound information for electric transformers from the manufacturers is available, sound power levels can be estimated by using the algorithms recommended by the Electric Power Plant Environmental Noise Guide (Volume 1, 2nd edition. Edison Electric Institute. Bolt Beranek and Newman Inc. Report 3637. 1983 Update). General dimensions and NEMA ratings will be reported.

NG Response III.C.19: *A noise study was conducted by Epsilon Associates Inc. for the Staplin Creek Substation and the final report dated February 14, 2024 was provided in Appendix G of the Application. The Staplin Creek Substation noise study concluded that operation of the proposed substation will comply with all applicable state design goals and local regulatory limits with respect to sound, therefore, no mitigation is proposed (see Staplin Creek Substation EM&CP, Part 1, filed on May 27, 2026) No noise plan is needed for just the transmission line.*

20. Complaint Management and Resolution Plan

A Complaint Management and Resolution Plan for construction and operation of the project, which shall describe the following:

- i. The name, mailing address, local or toll-free telephone number, and email address of the appropriate facility contact for development, construction, and operations. The toll-free or local phone number shall include a recorded outgoing message that will, when a call is not answered by a person, provide the caller with the name of the Certificate Holder's representative as well as:
 1. the number to be called in case of emergency; and
 2. when the caller can expect a return call.
- ii. The procedure and contact information for registering a complaint.
- iii. Contact information for the Department.
- iv. Methods for registering a complaint, which shall include a phone number, email address, mailing address, project website, and a form to report complaints.
- v. A response to all inquiries or complaints, with an acknowledgement of receipt to the complainant within one business day.
- vi. Process for responding to and resolving complaints in a consistent, timely, and respectful manner.
- vii. Logging and tracking of all complaints received and resolutions achieved, with records of the following for each complaint containing:
 1. The name and contact information of the person filing the complaint;
 2. Location and owner of the property where the complaint originated;
 3. Date and time of the underlying event causing the complaint;
 4. Description of the complaint; and
 5. Current status and description of measures taken to resolve complaint.

- viii. Reporting to DPS Staff of any complaints not resolved within ten (10) business days of receipt.
- ix. Mediating complaints not resolved within sixty (60) days.
- x. Providing annual reports of complaint resolution tracking to the Department.

NG Response III.C.20: *National Grid has included all of this information within Appendix K of this EM&CP. This includes outreach information, complaint resolution, project contacts, and methods for registering complaints. Logs will be kept through construction and will be shared with DPS Staff and the Secretary (as part of the annual report) as required.*

21. Long-Range ROW Management Plan

The Long-Range ROW Management Plan (“LRRMP”) shall:

- i. Describe methods for routine maintenance of the ROW for the operational life of the project, including management of danger trees, defined as any tree rooted outside of a project ROW that due to its proximity and physical condition (i.e., mortality, lean, decay, cavities, cracks, weak branching, root lifting, or other instability) poses a particular danger to a conductor or other key component of a transmission facility, specifications for clearances, inspection and treatment schedules, and environmental controls.
- ii. Include vegetation management recommendations, based on on-site surveys of vegetation cover types and growth habits of undesirable vegetation species.
- iii. Describe proposed chemical and mechanical techniques for managing undesirable vegetation, including herbicide use and limitations, specifications, and control measures.
- iv. Establish fence-line clearances, and overhead wire security clearance zone specifications, indicating applicable safety, reliability and operational criteria.
- v. Specify inspection and target treatment schedules and exceptions.
- vi. Describe standards and practices for inspection of facilities easements for erosion hazard, failure of drainage facilities, hazardous conditions after storm events or other incidents.
- vii. Describe landowner notification procedures for planned ROW inspection and maintenance activities.
- viii. Substantially comply with 16 NYCRR Part 84 and the final Orders issued by the Public Service Commission in Cases 04-E-0822 and 10-E-0155.

NG Response III.C.21: *National Grid will comply. National Grid intends to maintain the Project ROW substantively to the standards set forth in the TROWMP. The proposed ROW will be maintained to the same LRRMP standards included in National Grid’s Part 84 filing, filed with the Commission in Case 10-E-0155. Any alterations to the Part 84 filing in the future will be followed for maintenance of the ROW at a point past the date the alterations were filed with the Commission. Additionally, National Grid’s Forestry Practices are included in Appendix F.*

22. Pre-Installation Trial Plan (for In-Water Facilities)

A Pre-Installation Trial Plan for any proposed in-water cable installation methods for which suspended sediment and water quality monitoring is required, including jetting or mass flow excavation tools. The plan shall:

- i. Establish that pre-installation trials will be conducted within representative sections or areas proximate to the proposed in-water cable route, approximately 1,000 feet in length.
- ii. Allow for evaluation of compliance with threshold limits for turbidity, total suspended solids, and water quality standards for any constituents specified in the Certificate.
- iii. Describe how the results of the trials will be used to establish operating conditions that will minimize the suspension of in-situ sediments and contaminants during in-water cable installation activities.
- iv. Describe how water quality monitoring and sampling will be completed during the trials in a manner that is consistent with the Suspended Sediment and Water Quality Monitoring Plan.
- v. Describe how the results of the pre-installation trials will be evaluated in coordination with the Aquatic Environmental Monitor and DPS Staff to establish operational conditions and controls to minimize risks for water quality violations during construction.

NG Response III.C.22: This Project does not involve In-Water facilities.

23. Suspended Sediment and Water Quality Monitoring Plan (for In-Water Facilities)

The Suspended Sediment and Water Quality Monitoring Plan shall establish monitoring and sampling procedures to be conducted during pre-installation trials, dredging, dewatering of dredged material, barge decanting, pre-sweeping, pre-trenching, jet trenching activities, cable installation and maintenance and decommissioning activities that involve disturbance of sediments. The plan shall:

- i. Specify sample location, depth of samples, frequency of sampling, and sampling during various tidal cycles, where applicable, including frequency of visual turbidity observations.
- ii. Describe how quality assurance and control of samples will be maintained.
- iii. Describe procedures for background (up-current) and compliance (down-current) sampling and monitoring during construction activities for which sampling and monitoring is required.
- iv. Describe the use an Acoustic Doppler Current Profiler, or similar technology, to locate the plume.

- v. Require whole water samples in the vertical water column from at least three (3) depths, as determined by DPS staff in consultation with NYSDEC, which are representative of surface, mid-depth, and bottom conditions at the edge of the applicable mixing zone. Include an up-current transect outside the influence of monitored construction activities.
- vi. Provide that during monitored construction activities, the Certificate Holder will perform real-time turbidity monitoring and water quality sample collection for total suspended solids and any constituents required by the Certificate.
- vii. Identify the analytical methods that will be used to measure each contaminant for which the Certificate requires a numeric limit.
- viii. If required by the Certificate, describe the pre-activity calibration that shall be conducted for estimating TSS using in-situ turbidity measurements, including where additional calibrations may occur based on significant variations in sediment composition.

NG Response III.C.23: This Project does not involve In-Water facilities.

24. Dredge Management Plan (for In-Water Facilities)

The Dredge Management Plan for in-water facility construction shall:

- i. Describe methods and equipment purpose and specifications for any proposed dredging.
- ii. Establish that only vessels, barges, or scows in good operating condition shall be used and describe measures to ensure all equipment remains in such condition throughout dredging operations.
- iii. Describe procedures for dredge materials management and disposal.
- iv. Establish that washing of the gunwales of the scow or other vessels where dredged sediment is stored and transported will be avoided, except to the extent necessary to ensure the safety of workers.
- v. Prohibit sidecasting of dredged materials.
- vi. Describe the plan for dredge material dewatering or barge decant, where applicable, including:
 - 1. a minimum settling time of twenty-four (24) hours;
 - 2. additional sampling for projects with contaminated sediments;
 - 3. completed authorization request forms for water treatment chemicals, such as flocculants, planned for use; and
 - 4. practices that will be implemented to reduce resuspension of sediments.

NG Response III.C.24: This Project does not involve In-Water facilities.

25. Anchoring Plan (for In-Water Facilities)

The Anchoring Plan shall:

- i. Discuss how the use of anchoring, if any, during construction and maintenance activities will avoid and/or minimize impacts to sensitive benthic habitats and Significant Coastal Fish and Wildlife Habitats (e.g., use of vessels equipped with dynamic positioning systems, installing mid-line buoys) and avoid impacts to existing buried assets.
- ii. Outline the parameters for the use of anchors and spuds and identify discrete “No Anchor” areas within the Facility Corridor in the event anchoring is ultimately required.
- iii. Describe how midline buoys or alternative measures will be employed to minimize sediment disturbance caused by anchor sweeps during construction of the marine route.

NG Response III.C.25: This Project does not involve In-Water facilities.

26. Cable Monitoring and Maintenance Plan (for In-Water Facilities)

The Cable Monitoring and Maintenance Plan shall:

- i. Provide methods for determining the actual cable location and burial depth of the in-water cables and the timing for undertaking such efforts, including, for example, the use of distributed temperature sensing (DTS) technology.
- ii. Include a requirement that the Certificate Holder establish depth of burial relative to sediment surface and the accurate level of the sediment surface relative to vertical datum during post-construction survey operations.
- iii. Describe methods for maintaining burial depth.
- iv. Establish procedures for periodic monitoring of the actual burial depth (measured from the top of the cable) of the in-water cable throughout the operational life of the project.
- v. Describe procedures for evaluating risks if any section of the in-water cable that is at least twenty-five feet long reaches an actual burial depth of less than four feet at any point during the operational life of the project.
- vi. Describe procedures for remedying cable exposures with any time-of-year restrictions.
- vii. Describe procedures for remedying cable exposures that pose a hazard to public safety, navigation, or marine resources outside of time-of-year restrictions, including avoidance and minimization techniques for threatened and endangered species.

- viii. Include plans for marking the location of any cable exposures and procedures for immediately notifying DPS Staff of any third-party anchor strikes of the cable.

NG Response III.C.26: *This Project does not involve In-Water facilities.*

27. Decommissioning Plan (for applicable projects)

For projects that are required to file a Decommissioning Plan, the plan shall include:

- i. The anticipated life of the project.
- ii. Estimates of the decommissioning costs (in current dollars scrap and resale value cannot be used for offsetting decommissioning costs) for each of:
 - 1. For terrestrial projects, all facilities within New York State; and
 - 2. For in-water projects, including those associated with offshore wind:
 - a. that portion of the submarine cable route from the landfall locations to the boundary of New York State territorial waters or opposite landfall location; and
 - b. the onshore facilities.
- iii. Analysis of the options for decommissioning the project, including any cable protection measures used, and restoring the project area, including any decommissioning methods and potential impacts to the environment for each option.
- iv. If applicable, description of how the Certificate Holder will address impacts of leaving any portion of the project in place.
- v. Procedures and timeframes for notifying municipal officials and landowners and residents (if different from owners) of all properties that are crossed by or abut against the project ROW along the route about decommissioning activities.
- vi. Demonstrate that the Certificate Holder engaged the services of an independent trustee and entered into a Standby Trust Agreement for the administration of the funds from the letter of credit. The form of the Standby Trust Agreements shall be included, with proof of obtaining the relevant security.

NG Response III.C.27: *This Project is not one of the Projects for which a decommissioning plan would be required.*