Environmental Monitoring Plan – Revision 1

Hoffman Falls Wind

Towns of Fenner, Eaton, Nelson, and Smithfield

Madison County, New York

Revision	Date	Pages Affected
0	02/06/2026	All
1	04/14/2026	6-7

liberty renewables
Hoffman Falls Wind LLC

90 State Street
Albany, New York 12207

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Contents

Attachments

Acronym List

ORES	Office of Renewable Energy Siting and Electric Transmission
SSC	Site Specific Conditions
USCs	Uniform Standards and Conditions
AM	Agricultural Monitor
MET	Meteorological Tower
ALDS	Aircraft detection lighting system
POI	Point of Interconnection
O&M	Operations and Maintenance
PM	Project Manager
CSM	Construction Site Manager
PE	Project Engineer
EM	Environmental Monitor
SPDES	State Pollution Discharge Elimination System
SWPPP	Stormwater Pollution Prevention Plan
NYSAGM	New York State Department of Agriculture and Markets
NYCRR	New York Codes, Rules and Regulations
NYSDEC	New York State Department of Environmental Conservation
NYSDPS	New York State Department of Public Service
NYSEG	New York State Electric and Gas Corporation
ORES	Office of Renewable Energy Siting and Electric Transmission
POI	Point of Interconnection
SPDES	State Pollutant Discharge Elimination System
SSCs	Site Specific Conditions
SWPPP	Stormwater Pollution Prevention Plan
USACE	U.S. Army Corps of Engineers
USCs	Uniform Standards and Conditions

Glossary of Terms

Permittee/ Permit Holder	Hoffman Falls Wind LLC (the Permittee) a wholly owned subsidiary of Liberty Renewables Inc. (Liberty), the entity seeking a Siting Permit for Hoffman Falls Wind (the Facility) from the Office of Renewable Energy Siting and Electric Transmission (ORES) under Article VIII of the New York State Public Service Law.
Facility	Refers to the proposed 109.8-megawatt utility-scale wind energy generating project. Associated support facilities will include 18 wind turbines, an underground medium voltage collection system, gravel access roads, a permanent meteorological (MET) tower, an aircraft detection lighting system (ADLS) tower, temporary construction laydown areas, a temporary concrete batch plant, an operations and maintenance (O&M) facility,

	a medium voltage-to-transmission voltage collection substation, a point of interconnection (POI) switchyard, and a short 115kV overhead transmission line that will connect the Facility to the high voltage electrical grid.
Facility Site	The boundary area encompassing all parcels that are proposed to host Facility components.
Project	The development, construction, operation, and maintenance of the Hoffman Falls Wind Facility.
Limits of Disturbance (LOD)	The area within the Facility Site where the construction activities and site disturbance will occur.

1.0 Introduction

On December 22, 2025 the Office of Renewable Energy Siting and Electric Transmission (ORES) issued a Siting Permit to Hoffman Falls Wind LLC (Hoffman Falls Wind or Permittee), a subsidiary of Liberty Renewables Inc. (Liberty), for a major renewable energy facility (Project or Facility) located on private lands in the Towns of Fenner, Eaton, Nelson, and Smithfield, Madison County, New York (Facility Site). In conformance with the requirements of the Project's Siting Permit issued pursuant to Article VIII of the Public Service Law, Hoffman Falls Wind has developed this Environmental Monitoring Plan (EMP) to be submitted as a pre-construction compliance filing. Hoffman Falls Wind plans to construct, operate, and maintain the Project in a manner that is consistent with applicable laws and regulations and responsible community engagement.

The Siting Permit includes Site Specific Conditions (SSCs) and applicable Uniform Standards and Conditions (USCs) that must be met during construction and operation of the Project. This EMP has been developed in accordance with Section 6.1(e)(6) of the Siting Permit and consolidates and summarizes the various environmental protection provisions of issued permits that must be complied with during construction of the Project. Hoffman Falls Wind has made compliance with the Project's SSCs, applicable USCs, and compliance filings (including this EMP) an obligation of its contractors and will provide copies to those employees and contractors engaged in Project construction and site restoration. The EMP provides the framework and detail necessary for an independent, third-party Environmental Monitor (EM) and Agricultural Monitor (AM) to be available at the Project during construction activities and maintain the requirements as set forth by ORES and Sections 4.4(b) and 6.1(e)(6) of the Siting Permit.

1.1 Project Description

The Project is a wind-energy generating facility located on private land within the Towns of Fenner, Eaton, Nelson, and Smithfield, Madison County, New York. Hoffman Falls Wind is authorized to develop, design, construct, operate, and decommission a wind-powered electric generating facility consisting of the following components: 18 wind turbines, an underground medium voltage collection system, gravel access roads, a permanent meteorological (MET) tower, an aircraft detection lighting system (ADLS) tower, temporary construction laydown areas, a temporary concrete batch plant, an operations and maintenance (O&M) facility, a medium voltage-to-transmission voltage collection substation, a point of interconnection (POI) switchyard, a short 115kV overhead transmission line that will connect the Facility to the high voltage electrical grid, and other ancillary facilities.

2.0 Purpose, Organization, Roles, and Responsibilities

The following section details the purpose of the EMP, the organizational structure of the Project Team, and the roles and responsibilities of various team members in assuring compliance with SSCs, USCs and other environmental permit requirements during construction of the Project.

2.1 Purpose of this Environmental Compliance and Monitoring Plan

This EMP is designed to serve as a reference to aid in the management of environmental issues and concerns that may arise during construction. As such, it summarizes the major environmental protection requirements stipulated by the issued Siting Permit and agreed to by Hoffman Falls Wind.

The EMP also describes the monitoring and reporting framework necessary to ensure that the Project is completed within the environmental parameters set forth in the permits issued for the Project. The goal is for all Project Team members to work proactively with each other to avoid non-compliance with environmental protection requirements, as well as provide for the timely and responsive resolution of environmental compliance concerns or incidents that may arise during construction.

2.2 Organizational Structure of the Hoffman Falls Wind Project Teams

The Hoffman Falls Wind Project Team is comprised of the Site Management Team and the Contractor Teams. Each of these teams is made up of two or more supporting groups. The composition of these individual teams is identified in Sections 2.2.1 and 2.2.2.

2.2.1 Hoffman Falls Wind Site Management Team

The Hoffman Falls Wind Site Management Team is comprised of the Implementation and Construction Group, the Development and Permitting Support Group, and the Environmental Monitoring Group.

Implementation and Construction Group[1]

- Project Manager (PM)
- Construction Site Manager (CSM)
- Project Engineer (PE)
- Safety Officer
- Environment Compliance Manager

The Implementation and Construction Group consists of the Project Manager (PM), Construction Site Manager (CSM), Project Engineer (PE), Safety Officer, and Environment Compliance Manager. These personnel are responsible for managing the construction Project and overseeing the Contractor's activities daily. The CSM is always the primary point of contact for all groups on site and is the first point of contact for all reporting of all environmental compliance issues. If observed, the CSM will immediately report any compliance issues or concerns to the Environmental Monitor (EM).

The PE is responsible for providing technical assistance and design support to the Site Management Team and coordinating various aspects of Project design with permit compliance conditions. This engineer works closely to incorporate required permitting and construction standards into construction documents and

[1] See the Project's Facility Communication Plan (Appendix F) for specific contact information.

with any design changes and adjustments that are proposed as minor changes to the Project. The Project Manager is responsible for overall supervision and coordination of the Site Management Team.

Development and Permitting Support Group[2]

- Director of Development
- Permitting and Environmental Manager
- Government and Community Relations Manager
- Permitting Support
    - Wetland/Ecological Support
    - Cultural Resources Support

The Development and Permitting Support Group consists of the Director of Development, the Permitting and Environmental Manager, the Government and Community Relations Manager, and various permitting support staff. All individuals on this team have familiarity with the local community and possess intimate knowledge of the approved layout and permitting effort required to secure the Siting Permit.

The Director of Development is responsible for communicating development agreements to the Hoffman Falls Wind Site Management Team and providing overall historical perspective on Project development. The Director of Development, in coordination with the CSM and Government and Community Relations Manager, is responsible for landowner notifications, communications, and overseeing agency coordination under the general authority of the Site Management Team.

The Permitting and Environmental Manager is responsible for communicating the Siting Permit requirements to the Implementation and Construction Group and providing technical oversight to the on-site EMs. The Permitting and Environmental Manager is also responsible for identifying potential environmental sensitivities and environmental compliance inspection and permitting issues during construction on the Project.

The Government and Community Relations Manager is the primary contact for landowner questions or concerns regarding construction/operation of the Project. All such questions or concerns raised by participating landowners or from the public should be handled in accordance with the Project's Facility Communication Plan and Complaint Management Plan.

The Permitting Support Group assists in the preparation of compliance filings, change requests, and permit modifications, and reviews construction variance proposals from the Contractor and provide other permitting support services necessary for the Project to be built and operated in compliance with the Siting Permit conditions and all other permit requirements. The Wetland/Ecological and Cultural Resources Support sub-group are part of Permitting Support, and they will assist with any items listed above that involved their respective areas of expertise.

The Development and Permitting Support Group works through the CSM as needed unless other arrangements are specified.

Environmental Monitoring Group[2]

- Environmental Monitoring Manager
- Environmental Monitor (EM)/Agricultural Monitor (AM)
- Secondary Environmental Monitoring

The Environmental Monitoring Group is responsible for monitoring the environmental and agricultural conditions on the site and reporting compliance with the Siting Permit and environmental permits specific to the Project. The EM Group assesses the Project's ability to construct Project components in accordance with environmental requirements/commitments outline by (1) the environmental specification and stipulations outlined in the drawings and all applicable compliance filings, (2) the Siting Permit, and (3) the Project's adherence to the SPDES General Permit for Stormwater Discharges from Construction Activity GP-0-25-001 (SPDES General Permit) and associated Stormwater Pollution Prevention Plan (SWPPP); (4) the Agricultural Plan, (5) and Drainage Remediation Plan. The EM Group also acts as a liaison between the Site Management Team, Contractor Team, and agency representatives. Specific responsibilities of the Environmental Monitoring Group are also defined in the Siting Permit, various Project approvals/plans, and this EMP.

The EM/AM is the primary point of contact for environmental compliance on site. The EM also serves as the Qualified Inspector[2] and conducts routine stormwater inspections.

Contractually, the EM reports to the Environmental Compliance Manager and the Construction Site Manager. However, when on site, the CSM is the initial point of contact for the EM; the Environmental Compliance Manager will be copied on all correspondence. Additional details on the reporting protocol for the EM Group are included in Sections 2.3 and 2.4 of the EMP. The reporting is structured to allow independent communications to the Permitting and Environmental Manager to ensure that the EM is independent and clear of retributive action for performing duties of the job. The resumes for the Environmental Monitoring Group are included as Attachment 2.

[2] SDPES Permit Definition: Qualified Inspector – a person that is knowledgeable in the principles and practices of erosion and sediment control, such as a licensed Professional Engineer, Certified Professional in Erosion and Sediment Control, Registered Landscape Architect, New York State Erosion and Sediment Control Certificate Program holder or other NYSDEC-endorsed individual(s). It can also mean someone working under the direct supervision of, and at the same company as, the licensed Professional Engineer or Registered Landscape Architect, provided that person has training in the principles and practices of erosion and sediment control. Training in the principles and practices of erosion and sediment control means that the individual working under the direct supervision of the licensed Professional Engineer or Registered Landscape Architect has received 4 hours of NYSDEC-endorsed training in proper erosion and sediment control principles. After receiving the initial training, the individual working under the direct supervision of the licensed Professional Engineer or Registered Landscape Architect shall receive 4 hours of training every 3 years.

2.2.2 Contractor Team

The Hoffman Falls Wind Contractor Team is comprised of the Contractor Group and Subcontractor Group. The personnel and roles/responsibilities of these groups are listed herein.

Contractor Group

The Contractor Group is comprised of personnel from Contractor Team and Subcontractor Group. All environmental requirements of the Project are passed through to the Contractor's Site Construction Manager (SCM), as a matter of contract. While he or she will delegate specific responsibilities to other personnel in the Contractor Group, the SCM is ultimately responsible for the Contractor's and subcontractors' overall environmental and agricultural compliance performance on the Project.

Contractor Team

- Site Construction Manager (SCM)
- Construction Coordinator (CC) This is a requirement of the SPDES Permit. The EPC will need to identify multiple individuals, one at each major active construction area, to maintain compliance. Site Environmental Coordinator (SEC)
- Trained Contractor[3] – Requirement of SPDES Permit, needs to be onsite daily.

All members of the Contractor Group are contractually responsible for maintaining compliance with construction-related SSC and USC of the Siting Permit, the SPDES Construction General Permit and SWPPP, and all other permit requirements. The Site Construction Manager is responsible for overseeing the contractors' and subcontractors' execution and compliance with the Project's environmental and agricultural permitting requirements. The Site Environmental Coordinator, in coordination with the SCM, will be the Contractor Team's primary point of contact regarding environmental and permitting issues. In addition, the Environmental Monitoring Manager will coordinate closely with the CSM, SCM, SEC, and the EM regarding the construction plan/schedule to ensure compliance issues are resolved before construction schedules are impacted.

Subcontractor Group

The Subcontractor Group is comprised of numerous companies focused on various aspects of Project construction under the Contractor Team. It will remain the responsibility of Contractor Team to ensure environmental compliance for all subcontractors at the site under its control. The names and contact

[3] SDPES Permit Definition: Trained Contractor: an employee from the contracting (construction) company, identified in Part III.A.7., that has received four (4) hours of NYSDEC endorsed training in proper erosion and sediment control principles from a Soil and Water Conservation District, or other NYSDEC endorsed entity. After receiving the initial training, the trained contractor shall receive four (4) hours of training every three (3) years. It can also mean an employee from the contracting (construction) company, identified in Part III.A.7., that meets the qualified inspector qualifications (e.g. licensed Professional Engineer, Certified Professional in Erosion and Sediment Control (CPESC), Registered Landscape Architect, New York State Erosion and Sediment Control Certificate Program holder, or someone working under the direct supervision of, and at the same company as, the licensed Professional Engineer or Registered Landscape Architect, provided they have received four (4) hours of NYSDEC endorsed training in proper erosion and sediment control principles from a Soil and Water Conservation District, or other NYSDEC endorsed entity). The trained contractor is responsible for the day-to-day implementation of the SWPPP.

information for all subcontractors known will be added and maintained on the Project Contact List as they are added to the general contractor's team.

2.3 Role of the Environmental Monitor (EM)

The EM is the primary individual(s) responsible for overseeing and documenting compliance with environmental permit requirements on the Project. As such, the EM provides/arranges environmental training for construction personnel, participates in pre-construction planning/walkovers, answer questions and provides technical assistance in identifying and protecting sensitive environmental resources, and observes all construction activities and documents if work is completed in compliance with the requirements of all environmental plans, permits, and approvals. Pursuant to subpart 4.4(b) of the Final Siting Permit, the EM has stop work authority over all aspects of the Project. Additional specific responsibilities of the EM are spelled out in the Siting Permit.

The EM will be on site throughout the duration of Project construction and will document environmental compliance through daily reports. These reports will be submitted to the CSM, PM, Environmental Compliance Manager, New York State Department of Public Service (NYSDPS) field staff, and any other individuals, as directed by the CSM, along with recommendations on how to address observed or reported non-compliance issues. Additional details regarding the EM's activities, reporting responsibilities, and compliance protocols are described herein. Guidance from the EM to the contractors will flow through the CSM unless an alternate means of communication is approved by the CSM, or there is an immediate threat to safety or protection of the environment.

2.3.1 Role of the Agricultural Monitor (AM)

Hoffman Falls Wind proposes utilizing an environmental compliance monitor that is dually qualified to serve as the EM and the AM. The AM must have a confident understanding of normal agricultural practices (i.e., cultivation, crop rotation, nutrient management, drainage (subsurface and surface), chemical application, agricultural equipment operation, fencing, soils, etc.) and be able to identify how the Project may affect these practices during construction and restoration. Pursuant to subpart 4.4(b) of the Final Siting Permit, the AM has stop work authority over all aspects of the Project. The AM serves as the agricultural point of contact for ORES, the NYSDPS, the NYS Department of Agriculture and Markets (NYSAGM) staff and farm operators affected by the Project.

2.3.2 Site Inspection Activities

The EM will conduct inspections of all areas of environmental compliance during construction activities, with an emphasis on those activities that are occurring within environmentally sensitive areas, including cultural resource areas, active agricultural land, wetlands, and stream crossings. When on site, the EM's schedule will include participation in the morning Plan of the Day (POD) meetings with the CSM and the contractors to obtain schedule updates, identify in-field monitoring priorities, and address any previously observed or anticipated compliance issues. During the course of each day, multiple operations are likely to occur throughout the Project Area that will need to be monitored by the EM. Activities with the potential to impact sensitive resources or with greater potential for environmental impact will receive priority attention

from the EM. However, some level of field inspection by the EM will occur at all earth-disturbing work sites during each site visit.

2.4 Communication and Reporting Responsibilities

In general, all communication from the EM to the contractors goes through the CSM, unless direct correspondence with the contractor is authorized by the CSM or an emergency situation dictates immediate contractor response. The EM will carry a cellular telephone with voicemail and message alerts. Where cellular phone coverage is sparse, field staff may be able to transmit brief conversations via two-way radios that will be available in some field vehicles and at the construction field office. A comprehensive contact list of key individuals associated with the Project will be updated by the CSM, as needed, redistributed to all field staff, and will be made available in all construction trailers.

2.5 Communication of Non-Compliances

Consistent communication and elevation of non-compliant observations is important to ensure the Implementation and Construction and Contractor Groups maintain environmental vigilance at all work sites. To minimize non-compliances and potential violations, Hoffman Falls Wind will develop a culture that promotes environmental compliance by maintaining accountability for non-compliant actions and resolving minor non-conformances quickly. Throughout a typical day the EM may observe various environmental non-conformances, some of which may not reflect an adverse environmental impact but do not conform with the Siting Permit, and others that may require immediate corrective action. Observation made by the EM (described in greater detail in subsections 2.5.1 through 2.5.4) will be categorized in levels which include minor observation (Level 1), immediate corrective action (Level 2), non-compliance (Level 3), and stop work order (Level 4). Although the EM is primarily responsible for conducting compliance assessments, non-compliances may be identified by the Hoffman Falls Wind Site Management Team, Contractor Team, and/or agency personnel. Observations will be documented on daily inspection reports which will be submitted to NYSDPS field staff (see Section 2.6.1 below).

2.5.1 Minor Observation – Level 1

Minor observations are notifications to the Contractor Team by an EM, Hoffman Falls Wind Management Team, NYSDPS staff, or a regulatory agency. These minor observations are warnings to the Contractor Team of potentially inadequate controls, best management practices, or techniques. Minor observations are issued for areas that are presently in compliance but may require maintenance, additional, and/or different controls to remain in compliance or prevent potential future immediate corrective action (Level 2). Examples of minor observations are minor repairs that should be made to erosion and sediment control devices (that are still functioning) and general housekeeping.

2.5.2 Immediate Corrective Action – Level 2

Immediate corrective actions involve notification to the Hoffman Falls Wind Site Management Team or Contractor Team by NYSDPS staff or another governmental agency during an inspection. Level 2 immediate corrective actions are issued when controls or areas require significant effort (i.e., a reduction towards progressing work to address corrective action), actions, or maintenance to resolve, or when erosion and

sediment control repair(s) or maintenance are neglected in exceedance of 5 business days[4] from the initial notification. The Contractor Team and Hoffman Falls Wind's Site Management Team will address the following items:

- Hoffman Falls Wind will explain the unsatisfactory performance to the Contractor Group and identify how the activity does not meet the Project's compliance requirements.
- The Contractor Group will develop and implement a solution as soon as possible, preferably prior to the end of the day upon first notification.
- The EM will field-verify and document that the corrective action took place.

2.5.3 Non-compliance – Level 3

Non-compliance observations involve a notification by NYSDPS staff, a regulatory agency, and/or Hoffman Falls Wind's Site Management Team that one or more construction activities involve unsatisfactory performance or non-compliance issue(s) requiring immediate corrective action. Examples of non-compliances include direct non-compliance with the Siting Permit, observation of a water quality violation, improper handling of threatened and endangered species, or failure to report and/or clean up a spill. Level 3 non-compliance may include a Level 2 incident that has gone unaddressed. A site-specific stop work order may be issued at this level.

2.5.4 Stop Work Order – Level 4

Stop work orders involve observations of non-compliance or a non-compliant act that is actively or is potentially going to violate conditions of the Siting Permit. Stop work orders will comply with Section 4.1(k) and Section 4.4(b)(2) of the Siting Permit, which state:

Section 4.1(k) – Office Authority. The Permittee shall regard New York State Department of Public Service (NYSDPS) staff, authorized pursuant to PSL § 66(8), as the Office's representatives in the field. In the event of any emergency resulting from the specific construction or maintenance activities that violate, or may violate, the terms of the siting permit, compliance filings or any other supplemental filings, such NYSDPS staff may issue a stop work order for that location or activity pursuant to 16 NYCRR § 1100-12.1.

Section 4.4(b)(2) - The environmental monitor shall have stop work authority over all aspects of the Facility. Any stop work orders shall be limited to affected areas of the Facility. Copies of the reporting and compliance audits shall be provided to the host town(s) upon request.

In the event the CSM, EM, ORES, NYSDEC, NYSDPS, or other regulatory agency staff observe an activity that poses an immediate threat to environmental resources or the life and/or safety of the contractor or employee carrying out the activity, a stop work order may be issued directly to Hoffman Falls Wind or the contractor's employees or its subcontractors, either verbally or in writing. The EM will coordinate the stop

[4] SPDES Permit IV.C.5.a.i. – if corrective action does not require engineering design, begin implementing corrective actions within one business day; and complete the corrective actions within five business days or if the corrective action requires engineering design, begin within five business days; and complete corrective action in a reasonable time frame but no later than within 60 calendar days.

work order notification to ORES and the NYSDPS within 24 hours via notification in the daily reports and/or by telephone call.

Following the issuance of a stop work order, the EM or Safety Officer, or contractor's SEC will supply the Hoffman Falls Wind CSM with the following:

- The specific Permit condition(s) violated
- Corrective actions required to regain compliance and lift the issued stop work order
- Area(s) within construction site where the order applies.

All appropriate points of contact should convene at the location of the issued stop work order to review why and what Permit condition(s) were violated, provide directives to perform corrective actions, educate construction personnel involved in the incident, and see that corrective actions are followed through and completed so the stop work order can be lifted.

Within three days of issuing a stop work order directive, the EM, Safety Officer, or contractor's SEC will document the occurrence in a report and submit it to the Hoffman Falls Wind CSM. This report will include a summary of what violation(s) occurred and the corrective actions taken by the contractor to resolve the non-compliance. The contractor's Construction Manager will be required to provide steps taken to prevent future occurrences from happening.

2.6 Reporting Responsibilities

Reports of compliance concerns will be directed from the EM to the CSM, along with recommendations on how such concerns should be resolved. The CSM (in consultation with the EM and Environmental Compliance Manager) will determine the appropriate course of action to resolve these concerns and will direct the contractor accordingly within the strictures of the relevant Project Permits and Agreement and its Exhibits. Direct guidance from the EM to the contractor will only occur with the approval of the CSM. In situations where notifications to municipalities or agencies are required, such notifications will be coordinated by the CSM, Permitting and Environmental Manager and/or EM, with follow-up reporting to the CSM and the Permitting Group. In their role as an independent third-party, the EM is allowed to communicate directly with agency staff, as needed. The CSM and EM will work together to resolve and document all non-compliance issues.

To ensure full project records are available to the EM and others, a hard copy set of the current revision of all drawings, including any approved field changes, will be maintained in the EPC job trailer. To ensure permit compliance the following reports and/or notifications are anticipated to be completed by the EM or in consultation with the EM.

2.6.1 Daily Compliance Report

To ensure the Director of Development and CSM are kept current regarding all environmental impacts, a daily compliance report will be distributed at the end of each day. This report will contain a summary of the EM's observations and will serve to track Project compliance with permit requirements encountered during

that day's construction effort. Urgent environmental concerns will be described first, followed by less severe items, and will include any remedial steps initiated by the contractor to resolve. The EM will also document all pertinent conversations and/or commitments discussed with the Contractor Group, the Subcontractor Group and, when appropriate, NYSDPS staff or other regulatory agency representatives. Distribution of daily compliance reporting will at a minimum include the Hoffman Falls Wind Permitting and EM and CSM, and NYSDPS field staff. Additional distribution will come at the instruction of the Permitting and EM and/or CSM. At a minimum, these reports will contain:

a. Name of EM
b. Date
c. Weather and soil conditions
d. Location and description of observed site activities
    i. Description of observations and its compliance level (minor observation, immediate corrective action, non-compliance, and stop work orders) including representative photographs.
    ii. Documentation of pertinent conversations between the Site Management Team, Construction Team, or agency personnel.
    iii. Corrective actions taken by the Contractor and/or subcontractor including representative photographs.
    iv. If relevant, cite the specific Condition or permit violation observed.

2.6.2 Stormwater Inspection Reports

Based on the amount of soil disturbance present on site, the EM will conduct stormwater inspection reports once every seven days when less than 5 acres are disturbed at a time, twice every seven days when more than 5 acres are disturbed at a time (with a minimum of two days between inspections), and once every 30 days when all temporary disturbance has been stabilized (i.e., during winter shutdown).

All stormwater inspections and reporting will be completed in compliance with the Project's SWPPP and Part IV.C.4 of the NYS SPDES General Permit. The EM will coordinate with the CSM, contractors and subcontractors on all corrective actions needed to address erosion and sediment control issues. Distribution of the stormwater inspection reports will at a minimum include the Permitting and Environmental Manager and CSM, the Construction Group, NYSDPS field staff, and the NYSDEC Regional Engineer.

2.6.3 Spill Notification

In accordance with Section 4.4(m)(5) of the Siting Permit, spillage of fuels, waste oils, other petroleum projects or hazardous materials will be reported to the NYSDEC's Spill Hotline (1-800-457-7362) by the CSM, EM, or contractor's SEC within 2 hours, in accordance with the NYSDEC Spill Reporting and Initial Notification Requirements Technical Field Guidance. ORES and NYSDPS staff will also be notified by the EM after NYSDEC notifications of all reported spills.

2.6.4 Inadvertent Return Notification and Reporting

In the event drilling fluid inadvertently surfaces in a wetland or stream, NYSDEC and NYSDPS staff will be notified as outlined in the ORES-approved Inadvertent Return Flow Plan. Following the initial notification, a written monitoring report will be generated and submitted in accordance with the ORES-approved

Inadvertent Return Flow Plan. This report will contain a description of the location, estimated volume of drilling fluid released, and a description of the cleanup efforts.

2.6.5 Record of All Observed Threatened and Endangered (T&E) Species

In accordance with Siting Permit Section 4.4(o), Hoffman Falls Wind will implement monitoring and reporting for threatened and endangered species (see also Section 4.4.3). During construction, the EM will be responsible for recording occurrences of any T&E species within the Project Site. All occurrences will be reported in a bi-weekly monitoring report submitted to the NYSDPS and NYSDEC. This report will include the following:

- Species observed
- Number of individuals
- Age and sex of individuals (if known)
- Observation date(s) and time(s)
- Global Positioning System (GPS) coordinates of each individual observed (if GPS is unavailable, the report will include the nearest turbine number and crossroads location)
- Behavior(s) observed
- Identification and contact information of the observer(s)
- Nature of and distance to any Facility construction, maintenance or restoration activity.

2.6.6 Agricultural Reporting

Compliance with agricultural conditions and requirements, including the Agricultural Plan, will be addressed in the Daily Compliance Report.

2.6.7 Invasive Species Reporting

Compliance with invasive species conditions and requirements, including the Invasive Species Control and Management Plan, will be addressed in the Daily Compliance Report.

2.6.8 Biweekly Monitoring Report

In accordance with Siting Permit Section 4.4(d)(1), every 14 days, Hoffman Falls Wind will provide the NYSDPS, ORES, and any designated representative for the Towns of Fenner, Eaton, Nelson, and Smithfield with a report summarizing the status of construction activities, and the schedule and locations of construction activities for the next 14 days. The report will be submitted by ECM.

2.6.9 Monthly Inspection and Report

In accordance with Siting Permit Section 4.4(d)(3), the Permittee will support monthly inspections of the Facility. In the course of these monthly inspections and at other times as may be determined by NYSDPS Staff, the Permittee will accommodate reviews of any of the following:

- The status of compliance with Siting Permit conditions
- Field reviews of the Facility Site
- Actual or planned resolutions of complaints
- Significant comments, concerns, or suggestions made by the public, municipalities, or other agencies and indicate how the Permittee has responded to the public, local governments, or other agencies
- The status of the Facility in relation to the overall schedule established prior to the commencement of construction
- Other items the Permittee, NYSDPS staff, or Office staff consider appropriate.

After every monthly inspection, Hoffman Falls Wind will provide the NYSDPS, ORES, and representative(s) for the Towns of Fenner, Eaton, Nelson, and Smithfield with a written record of the results of the inspection, including resolution of issues and additional measures to be taken.

2.6.10 Annual Inspection Program and Report

In accordance with Siting Permit Section 4.5(d), Hoffman Falls Wind will have an annual inspection program for its facilities. An annual inspection report will summarize maintenance and inspection activities performed and include details of any repairs undertaken. Reports will identify any major damage, defects or other problems, or indicate that no such damage, defect or problem was found. Reports will be made readily available upon request by the NYSDPS or ORES.

2.6.11 Screen Planting Plans Inspection & Replanting Report

In accordance with Siting Permit Section 4.4(l)(3), Hoffman Falls Wind will retain a qualified landscape architect, arborist, or ecologist to inspect the screen plantings for 2 years following installation to identify any plant material that did not survive, appears unhealthy, and/or otherwise needs to be replaced. Hoffman Falls Wind will remove and replace plantings that fail in materials, workmanship or growth within 2 years following the completion of installing the plantings. Reports will be made readily available upon request by the NYSDPS or ORES.

3.0 Pre-construction Coordination

3.1 Pre-Construction Meeting

In compliance with Section 4.4(c) of the Siting Permit, at least 14 days before the commencement of construction, Hoffman Falls Wind will convene a pre-construction meeting and invite ORES, the NYSDPS, NYSDEC, NYSAGM, and New York State Department of Transportation staff, the Town Supervisors, and the Towns and County Highway Departments to attend. The contractor's team and the EM will be required to attend the pre-construction meeting.

An agenda, the location, and an attendee list will be agreed upon between ORES, NYSDPS staff, and Hoffman Falls Wind and distributed to the attendee list at least one week prior to the meeting.

Maps showing designated travel routes, construction worker parking and access road locations and a general facility schedule will be distributed to the attendee list at least one week prior to the meeting. Hoffman Falls Wind will supply draft minutes from this meeting to the attendee list for corrections or comments, and thereafter Hoffman Falls Wind will issue the finalized meeting minutes.

If, for any reason, the Contractor Group cannot finish construction of the Project, and one or more new Contractor Groups are needed, there will be another pre-construction meeting with the same format as outlined.

3.2 Site Specific Environmental and Safety Training

In order to gain access to the site, all personnel (e.g., laborers, operators, vendors, subcontractors, etc.) will be required to attend site-specific environmental and safety training. Development of this training will be completed by the Hoffman Falls Wind Site Management Team and Environmental Compliance Team. This training will occur during the on-boarding process of new personnel and will cover site-specific safety and compliance concerns. All site personnel will be required to document their attendance via a sign-in sheet.

3.3 Identification of Construction Work Sites

In order to properly coordinate pre-construction activities and comply with Section 4.4(e) of the Siting Permit, the contractors, in consultation with Hoffman Falls Wind Site Management Team, will identify specific work sites at least two weeks before tree clearing, or ground disturbing activities commence. The following areas are required to be staked or flagged:

- The limits of disturbance (LOD)
- Boundaries of any delineated regulated wetlands, waterbodies or streams in the LOD and those directly adjacent
- Any known archaeological sites identified in the approved Cultural Resources Avoidance, Minimization and Mitigation Plan.
    - In addition, where denoted in the civil drawings, archaeological sites shall be surrounded with construction fencing and a sign stating restricted access.
- All on- or off-ROW access roads
- Limits of clearing
- Other areas needed for construction such as, but not limited to, turbine work areas, proposed infiltration areas for post-construction stormwater management, laydown and storage areas.

3.4 Flagging, Fencing, and Signage

Two weeks prior to the start of construction within a specific area, the area will be staked and/or flagged by the Contractors with all necessary Project limiting boundaries (e.g., disturbance, sensitive resource areas, exclusion areas, and the location of Project components). Staking and/or flagging will progress in phases until complete, with the understanding that a two-week waiting period is required prior to initiating

construction in a newly staked/flagged area. The Contractors will be instructed to not disturb or remove any of this flagging, as it will aid in identifying important areas throughout the Facility Site.

Each Contractor Team will identify sensitive resources within/immediately adjacent to the delineated area of construction. These areas will typically be identified by flagging, signage, or staking. In some instances, fencing or protective barriers will be installed to ensure that the construction activity does not enter protected resources or exclusion areas, or that specific procedures (i.e., Siting Permit requirements) are followed in certain locations. The method selected to identify sensitive resource areas will provide the highest visibility to construction workers, while also being practical to install.

3.5 Pre-construction Walkover

Prior to construction and following completion of the survey efforts (i.e., flagging, staking, and signage), personnel from the Hoffman Falls Wind Site Management Team, Environmental and Agricultural Monitoring, and Contractor Teams will conduct a site walkover of areas to be affected by construction activities. This walkover should include any involved subcontractors and may at times include agency representatives. It will be used to identify items such as landowner restrictions, sensitive environmental resources (e.g., agricultural fields, wetlands), limits of clearing, proposed stream and wetland crossing locations, location of drainage features, and layout of sediment and erosion control features. Specific construction procedures will be determined, and any modifications will be proposed, so as to allow a request for minor change to be submitted and approved (if necessary) before the start of construction. These walkovers should be scheduled early enough in the process to avoid potential delays in the start of construction if a minor change is required. Landowners will be consulted or included, as needed.

3.6 Field Changes

During construction, it may become apparent that modifications or deviations to the site design and/or technical detail originally approved by agency personnel are necessary. Unforeseen field conditions are typically the leading driver of plan modifications. Proposed changes to the construction plan should be identified as soon as possible prior to the need for approval, as changes may require review by multiple agencies and approval by ORES and therefore will take time for approval to be granted. All proposed changes must be reviewed and approved by the Hoffman Falls Wind CSM and Permitting and Environmental Manager to determine if agency approval is required before enacting the proposed change. If the CSM and Permitting and Environmental Manager are unable to determine if the proposed change would require approval by the agencies, consultation with ORES/NYSDPS Staff is recommended. Field change minor modification requests must include a completed field change minor modification request form (see Attachment A to the approved Construction Operations Plan), accompanied by all relevant supporting documentation.

4.0 Construction Requirements

The following section of the EMP outlines a summary of specific SSCs or USCs relevant to various construction activities and Project components.

4.1 Erosion and Sediment Control Measures

All stormwater management and erosion and sediment control measures will be implemented and installed in accordance with the Project's SWPPP and the Erosion and Sediment Control Plan.

Plastic or timber matting installed to avoid or minimize environmental impacts will be installed in coordination with the EM and other applicable Project team members. Non-jurisdictional crossings of wetlands and streams accomplished using matting will be monitored at least every four months in coordination with the EM to assure correct functioning of the matting. Matting that becomes covered with soil or construction debris will be cleaned and the materials removed and disposed of in an upland location. Matting will be removed by equipment stationed on a mat or areas outside the wetland or stream. Following removal from the wetland or stream, matting will be cleaned of any invasive species (seed, plant materials, insects, etc.).

Applicable USCs pertaining to erosion and sediment control including the following:

Section 4.4(m)(4) – E&S Materials. Permanent erosion control fabric or netting used to stabilize soils prior to establishment of vegetative cover or other permanent measures shall be one hundred (100) percent biodegradable natural product, excluding silt fence. Use of hay for erosion control or other construction-related purposes is prohibited to minimize the risk of introduction of invasive plant species.

Section 4.4(p)(5) – Turbid Water. Turbid water resulting from dewatering operations shall not be allowed to enter any wetland, waterbody, or stream. Water resulting from dewatering operations shall be discharged directly to settling basins, filter bags, or other approved device. All necessary measures shall be implemented to prevent any substantial visible contrast due to turbidity or sedimentation downstream of the work site.

Spill Prevention - All hazardous materials associated with construction of the Facility will be stored, handled, discarded, and cleaned in accordance with each general contractor's spill response/health and safety or SPCC Plan. Applicable USCs pertinent to spill prevention include the following:

Section 4.4(m)(5) – Spill Kits. All construction vehicles and equipment shall be equipped with a spill kit. All equipment shall be inspected daily for leaks of petroleum, other fluids, or contaminants; equipment may only enter a stream channel if found to be free of any leakage. Any leaks shall be stopped and cleaned up immediately. Spillage of fuels, waste oils, other petroleum products or hazardous materials shall be reported to the NYSDEC's Spill Hotline within two (2) hours, in accordance with the NYSDEC Spill Reporting and Initial Notification Requirements Technical Field Guidance (see 19 NYCRR §1100-15.1(i)(1)(iii)). The Office and the NYSDPS shall also be notified of all reported spills in a timely manner.

Section 4.4(p)(2) – Equipment Maintenance and Refueling. Equipment storage, refueling, maintenance, and repair shall be conducted and safely contained more than one hundred (100) feet from all wetlands, waterbodies, and streams and stored at the end of each workday unless moving the equipment will cause additional environmental impact. Dewatering pumps operating within one hundred (100) feet of wetlands, waterbodies, or streams may be refueled in place and shall be within a secondary containment large

enough to hold the pump and accommodate refueling. All mobile equipment, excluding dewatering pumps, shall be fueled in a location at least one hundred (100) feet from wetlands, waterbodies and streams unless moving the equipment will cause additional environmental impact.

Section 4.4(p)(3) Fuel Storage. Fuel or other chemical storage containers shall be appropriately contained and located at least three hundred (300) feet from wetlands, waterbodies, and streams.

4.2 Vegetation Clearing and Disposal Methods

All vegetation management will be completed in accordance with the approved Vegetation Management Plan (Appendix C). Applicable USCs pertaining to vegetation clearing and disposal methods include the following:

Section 6.1(e)(4) – Vegetation Management Plan, which shall include, at a minimum, the following:

i. *Vegetation management practices for switchyard and substation yards and for transmission and interconnection facilities, including danger trees (trees that due to location and condition are a particular threat to fall on and damage electrical equipment) around transmission and interconnection facilities, specifications for clearances, inspection and treatment schedules, and environmental controls to avoid off-site effects;*

ii. *Vegetation management recommendations, based on on-site surveys of vegetation cover types and growth habits of undesirable vegetation species;*

iii. *Planting of native vegetation, based on on-site surveys of vegetation cover types and growth habits of undesirable vegetation species;*

iv. *Restoration of disturbed areas, ruts, and rills to original grades and conditions with permanent re-vegetation and erosion controls appropriate for those locations;*

v. *All proposed chemical and mechanical techniques for managing undesirable vegetation. Herbicide use and limitations, specifications, and control measures shall be included;*

vi. *Substation fence-line clearances, and overhead wire security clearance zone specifications, indicating applicable safety, reliability and operational criteria;*

vii. *Inspection and target treatment schedules and exceptions;*

viii. *Standards and practices for inspection of facilities easements for erosion hazard, failure of drainage facilities, hazardous conditions after storm events or other incidents;*

ix. *Review and response procedures to avoid conflicts with future use encroachment or infrastructure development; and*

x. *Host landowner notification procedures.*

Section 4.4(m)(7) – Clearing Areas. Tree and vegetation clearing shall be limited to the minimum necessary for facility construction and operation, and as detailed on final construction plans.

Section 4.4(m)(8) – Clearing Methods. When conducting clearing, the Permittee shall:

i. Comply with the provisions of 6 NYCRR Part 192, Forest Insect and Disease Control, and ECL §9-1303 and any quarantine orders issued thereunder;

ii. Not create a maximum wood chip depth greater than three (3) inches, except for chip roads (if applicable), nor store or dispose wood chips in wetlands, within stream banks, delineated floodways, or active agricultural fields;

iii. Not dispose of vegetation or slash by burning anywhere or burying within a wetland or adjacent area; and

iv. Coordinate with landowners to salvage merchantable logs and fuel wood. Where merchantable logs and fuel wood will not be removed from the facility site during clearing activities, final construction plans shall indicate locations of stockpiles to be established for removal from site or future landowner resource recovery.

4.3 Facility Component Construction

4.3.1 Temporary Laydown Areas

All laydown areas associated with the Project are identified in the final Plans, Profiles, and Detail Drawings. Proposed laydown areas not included in compliance filings require approval from DPS Staff prior to utilization, regardless of landowner permission. All laydown areas constructed in agricultural land will be constructed in accordance with the NYSAGM Guidelines for Construction Mitigation for Projects on Agricultural Lands (NYSAGM Guidelines, see Section 6 References). Following construction, all temporary laydown areas will be removed and restored in accordance with the Project's Agricultural Plan.

4.3.2 Access Roads

All access roads will be constructed in accordance with the final Plans, Profiles, and Detail Drawings, and all applicable conditions outlined in the NYSAGM Guidelines (see Section 6 References) and the Project's Water Quality Certification and Nationwide Permit. Applicable USCs pertaining to access road construction include the following:

Section 4.4(f) – Dig Safely NY. Prior to the commencement of construction, the Permittee shall become a member of Dig Safely New York. The Permittee shall require all contractors, excavators, and operators associated with its facilities to comply with the requirements of the PSC's regulations regarding the protection of underground facilities at16 NYCRR Part 753.

Section 4.4(m)(6) – Construction Debris. Any debris or excess construction materials shall be removed to a facility duly authorized to receive such material. No burying or burning of construction debris or excess construction materials will be allowed.

Section 4.4(q)(4) – Access Roads Through Wetlands.[5] *Installation of access roads through wetlands shall be performed using the following methods:*

i. Temporary access roads shall use timber/construction matting that is completely removed after construction/maintenance activities are completed and removal shall be verified with the NYSDPS by the on-site environmental monitor after construction, or by the facility operator after maintenance work is completed.

ii. Permanent access roads shall use a layer of geotextile fabric and a minimum of six (6) inches of gravel shall be placed in the location of the wetland crossing after vegetation and topsoil is removed. Access roads shall be designed and constructed to adequately support the type and frequency of the anticipated vehicular traffic and include suitable culverting or other drainage infrastructure as needed to minimize the impact to wetland hydrology.

4.3.3 Electrical Collection System

The collection system will be constructed in accordance with the final Plans, Profiles, and Detail Drawings. Where electric collection lines occur within agricultural land, installation and restoration practices will comply with NYSAGM Guidelines (see Section 6 References). Where electric collection lines cross wetlands, streams, or other regulated waterbodies, installation and restoration practices will avoid all jurisdictional impacts and comply with all applicable Siting Permit conditions. Following construction, all work areas and soil stockpiles will be removed and restored in accordance with the Project's Agricultural Plan.

4.3.4 Substation and POI

The Collection Substation, and POI Substation, will be constructed in accordance with the applicable Plans, Profiles and Detail Drawings. All substation and POI facilities constructed in agricultural land will be constructed in accordance with the NYSAGM Guidelines (see Section 6 References). Following construction, all work areas and soil stockpiles will be removed and restored in accordance with the Project's Agricultural Plan.

4.4 Environmental Resource Protection Measures

4.4.1 Wetlands, Streams, and Other Waterbodies

Construction within or adjacent to regulated waterbodies will be conducted in accordance with the applicable Plans, Profiles and Detail Drawings and the Project's Water Quality Certification and Nationwide Permit. Applicable USCs pertinent to construction in wetlands, streams, and other waterbodies include the following:

[5] No federally jurisdictional impacts to wetlands and streams are proposed.

Section 4.3(b) – Federal Requirements. The Permittee shall construct and operate the facility in a manner that conforms to all applicable federal and federally-delegated permits identified in 16 NYCRR §1100-2.26). If relevant facility plans require modifications due to conditions of federal permits, the final design drawings and all applicable compliance filings shall be revised accordingly and submitted for review and approval pursuant to 16 NYCRR §1100-11.1.

Section 4.4(p)(1) - Environmentally Sensitive Area (ESA) Flagging. Prior to performing construction in an ESA, defined herein as any NYS-regulated wetlands, waterbodies or streams and associated adjacent areas identified in the delineations approved by the Office pursuant to 16 NYCRR §§1100-1.3(e) and (f), the Permittee shall mark the boundaries of the ESA with colored flagging, "protected area" signs, or erosion and sediment control measures specified by the SWPPP. As necessary to prevent access by motorized vehicles into ESAs where no construction is planned, the Permittee shall install additional markers or signs stating, "No Equipment Access."

Section 4.4(r) – Work in NYS-protected waters.[6] The Permittee shall implement the following:

(1) Dry Conditions. In-stream work shall only occur in dry conditions, using appropriate water handling measures to isolate work areas and direct stream flow around the work area. Any waters accumulated in isolated work areas shall be discharged to an upland settling basin, field, or wooded area to provide for settling and filtering of solids and sediment before water is return to the stream. If measures fail to divert all flow around the work area, in-stream work shall stop until dewatering measures are functioning properly.

(2) In-Water Work Windows. In-stream work shall be prohibited from March 15 through July 15 in warm water fisheries unless the Permittee receives site specific approval from the Office.

(3) Stream Channels. The restored stream channel shall be equal in width, depth, gradient, length and character to the pre-existing stream channel and tie in smoothly to the profile of the stream channel upstream and downstream of the disturbance. The planform of any permanent stream shall not be changed, unless dictated by restoration or mitigation objectives. All disturbed stream banks shall be mulched within two (2) days of final grading, stabilized with one hundred (100) percent natural or biodegradable fiber matting, and seeded with an appropriate riparian seed mix.

(4) Felled Trees in an ESA. Trees shall not be felled into an ESA stream or its stream bank. Snags which provide shelter in streams for fish shall not be disturbed unless they cause serious obstructions, scouring or erosion.

Section 4.4(q)(1) - Construction in Wetlands and Adjacent Areas. All construction activities completed within wetlands and/or adjacent areas shall adhere to the following requirements:

ii. Work should be conducted during dry conditions without standing water or when the ground is frozen, where practicable.

iii. Excavation, installation, and backfilling in wetlands shall be performed in one continuous operation.

iv. Temporary construction matting shall be used as necessary to minimize disturbance to the wetland soil profile during all construction and maintenance activities. All temporary construction matting shall be removed as soon as practicable but no later than four months following installation from the wetland and cleaned of any invasive species (seed, plant materials, insects, etc.) after construction/maintenance activities are completed and removal shall be verified with the on-site

[6] No federally jurisdictional impacts to wetlands and streams are proposed.

environmental monitor after construction. Matting shall be removed by equipment stationed on a mat or areas outside the wetland or adjacent area.

v. *In the event that construction results in an unanticipated alteration to the hydrology of a wetland (i.e., lowering), the breach shall be immediately sealed, and no further activity shall take place until the NYSDPS and the Office is notified and a remediation plan to restore the wetland and prevent future dewatering of the wetland has been approved.*

vi. *Before trenching occurs, upland sections of the trench shall be backfilled or plugged to prevent drainage of possible turbid trench water from entering the wetland.*

vii. *Trench breakers/plugs shall be used at the edges of wetlands as needed to prevent wetland draining during construction.*

viii. *In wetland areas, the topsoil shall be removed and stored separate from subsoil. The top twelve (12) inches of wetland topsoil shall be removed first and temporarily placed onto a geo-textile blanket.*

ix. *Only the excavated wetland topsoil and subsoil shall be utilized as backfill, with the exception of clean bedding material for electrical collection lines and/or conduits, provided there is no change to the pre-construction contours upon restoration; and trench-breakers are used to prevent draining the wetland.*

x. *Subsoil dug from the trench shall be sidecast on the opposite side of the trench on another geo-textile blanket running parallel to the trench, if necessary.*

xi. *Trenches shall be backfilled with the wetland subsoil and the wetland topsoil shall be placed back on top. All excess materials shall be completely removed to upland areas more than one hundred (100) feet from the wetland and suitably stabilized.*

xii. *When backfilling occurs, the subsoil shall be replaced as needed, and then covered with the topsoil, such that the restored topsoil is the same depth as prior to disturbance.*

xiii. *All disturbed soils within wetlands and adjacent areas shall be seeded with an appropriate native wetland seed mix, shrubs, live stakes, or tree planting as site conditions and design allow, as appropriate for existing land uses. Straw mulch shall be maintained until the disturbed area is permanently stabilized. Hay shall not be used for mulching of wetlands or adjacent areas.*

xiv. *In agricultural or farmed wetlands, crop covers consistent with existing agricultural uses shall be utilized in all areas of soil disturbance.*

xv. *Installation of underground collection lines in wetlands shall be performed using the following methods:*

   a. *The Permittee shall implement best management practices to minimize soil compaction;*
   b. *During excavation, all topsoil shall be stripped and segregated from subsoils. The Permittee shall consolidate trenching areas to the maximum extent practicable to minimize impacts to agricultural soils;*
   c. *All reasonable efforts shall be made to backfill open trenches within the same workday if rain is predicted and as soon as practicable otherwise; and*
   d. *All excess materials shall be completely removed from wetlands to upland areas. Excess topsoil from agricultural areas shall be spread within the immediate agricultural areas within the approved LOD, or within other nearby areas that will still be used for agricultural production.*

4.4.2 Invasive Species

Invasive species control will be implemented in accordance with the Invasive Species Control and Management Plan. Applicable USCs pertinent to invasive species control include the following:

Section 4.4(m)(9) - Invasive Insects. To control the spread of invasive insects, the Permittee shall provide training for clearing and construction crews to identify the Asian Longhorn Beetle and the Emerald Ash

Borer and other invasive insects of concern as a potential problem at the facility site. If these insects are found, they must be reported to the NYSDEC as soon as practicable.

4.4.3 Threatened and Endangered (T&E) Species

Threatened and Endangered species observations during construction of the Project will be reported in compliance with the following USCs:

Section 4.4(o)(3) - For facilities that will have more than a de minimis impact on NYS threatened or endangered grassland birds, the Permittee shall implement the following as part of the Net Conservation Benefit Pllan (NCBP):

i. The Permittee shall implement environmental monitoring immediately prior to and during construction in the occupied habitat to search for NYS threatened or endangered species occurrence based on the species' seasonal windows for presence.

ii. If active nests of the NYS threatened or endangered species are found within the occupied habitat, then the Permittee shall coordinate with the NYSDPS and the Office to adjust the limits of disturbance and/or adjust the construction schedule to avoid work in the area until nesting has been completed.

iii. To avoid direct impacts to NYS threatened or endangered grassland bird species, the following work windows apply for all ground disturbance and construction-related activities, including restoration and equipment/component staging, storage, and transportation, within occupied habitat:

a. In NYS threatened or endangered grassland bird occupied breeding habitat, work shall be conducted only between August 16 and April 22;

b. In NYS threatened or endangered grassland bird occupied wintering habitat, work shall be conducted only between April 1 and November 14;

iv. If fields within identified occupied breeding habitat are planted with row crops (e.g., corn, beans, or vegetables) in the farming season prior to the commencement of facility construction and such fields were historically used for row crops during at least one of the prior five (5) years, these fields will not be subject to the construction timing restrictions set forth in subparagraphs (iii)(a) and (c) of this paragraph.

v. If the Permittee has identified construction activities that must occur between November 15 and March 31 in identified NYS threatened or endangered grassland bird occupied wintering habitat, or between April 23 and August 15 in identified NYS threatened or endangered grassland bird occupied breeding habitat outside of row crop areas described above, the occupied habitat area(s) proposed for active construction shall be assessed by an on-site environmental monitor or biologist who shall conduct surveys for NYS threatened or endangered grassland bird species. The surveys shall occur weekly until construction activities have been completed in the occupied habitat area,

unless otherwise agreed to by the Office. If no NYS threatened or endangered grassland bird species are detected during the survey, the area shall be considered clear for seven (7) days, when another survey shall be performed. If NYS threatened or endangered grassland bird species are detected, the Permittee shall comply with subdivision (o)(7) of this section.

Section 4.4(o)(4) - For facilities that will impact NYS threatened or endangered bat species, the Permittee shall implement the following as part of the NCBP:

ii. If at any time during the life of the facility, an active NYS threatened or endangered bat species maternity colony roost tree (or structure) is discovered within the facility site, the NYSDPS and the Office shall be notified within twenty-four (24) hours of discovery (during construction) and forty-eight (48) hours of discovery (during operation), and the colony site shall be marked. A five hundred (500)-foot radius around the colony shall be posted and avoided until notice to continue construction, ground clearing, grading, non-emergency maintenance or restoration activities, as applicable, at that site is granted by the NYSDPS or the Office. A re-evaluation of the potential impacts of the Project on listed bat species shall be provided to the NYSDPS and Office.

iii. Tree Clearing Limitations for Northern Long-eared Bats:

c. From April 1 to October 31, the following restrictions shall be implemented for all tree clearing activities in the facility site, unless otherwise agreed by the Office:

2. If any bats are observed flying from a tree, or from a tree that has been cut, tree clearing activities within 150 feet of any known maternity roost tree or one quarter mile of any known hibernaculum, depending on the potential species present, shall be suspended and the NYSDPS and the Office shall be notified as soon as possible. The Permittee shall have an environmental monitor present on site during all tree clearing activities. If any bat activity is noted, a stop work order will immediately be issued and shall remain in place until such time as the NYSDPS and the Office have been consulted and authorize resumption of work.

Section 4.4(o)(6) – To avoid and minimize impacts to bald eagles, the Permittee shall implement the following:

i. If, at any time during construction and operation of the facility, an active bald eagle nest or roost is identified within the facility site, the NYSDPS and the Office shall be notified within forty-eight (48) hours of discovery and prior to any disturbance of the nest or immediate area. An area one quarter (0.25) mile for nests without a visual buffer and six hundred sixty (660) feet in radius for nests with a visual buffer from the nest tree shall be posted and avoided to the maximum extent practicable until notice to continue construction at that site is granted by the NYSDPS and the Office.

ii. Tree removal is not allowed:

a. *Within six hundred sixty (660) feet from an active nest during breeding season (January 1 – September 30);*

b. *Within one quarter (0.25) mile from an important winter roost during the wintering period (December 1 – March 31); or*

c. *Of overstory trees within three hundred thirty (330) feet of an active nest at any time.*

iii. *Operational Impacts from Wind Facilities. If at any time during the operation of the facility a bald eagle is injured or killed due to collision with project components, the Permittee shall pay the required mitigation fee into the Endangered and Threatened Species Mitigation Bank Fund commensurate with number of eagles taken with the sole purpose to achieve a net conservation benefit to the impacted species.*

Section 4.4(o)(7) - Record All Observations of NYS Threatened or Endangered Species. During construction and restoration of the facility and associated facilities, the Permittee shall maintain a record of all observations of NYS threatened or endangered species as follows:

i. *Construction. During construction, the on-site environmental monitor shall be responsible for recording all occurrences of NYS threatened or endangered species within the facility site. All occurrences shall be reported in a biweekly monitoring report submitted to the NYSDPS, with a copy to the Office, and such reports shall include the information described in subparagraph (iii) of this paragraph. If a NYS threatened or endangered bird species is demonstrating breeding behavior, it shall be reported to the NYSDPS and the Office within forty-eight (48) hours.*

ii. *Restoration. After construction is complete, incidental observations of any NYS threatened or endangered species shall be documented and reported to the NYSDPS, with a copy to the Office, in accordance with the reporting requirements in subparagraph (iii) of this paragraph.*

iii. *Reporting Requirements. All reports of NYS threatened or endangered species shall include the following information: species; number of individuals; age and sex of individuals (if known); observation date(s) and time(s); Global Positioning System (GPS) coordinates of each individual observed (if operation and maintenance staff do not have GPS available, the report shall include the nearest wind turbine and cross roads location); behavior(s) observed; identification and contact information of the observer(s); and the nature of and distance to any facility construction, maintenance or restoration activity.*

Section 4.4(o)(8) - Discovery of Nests or Dead or Injured NYS Threatened or Endangered Bird Species

i. *Excluding bald eagles, if an active nest of a federal or NYS threatened or endangered bird species is discovered (by the Permittee's on-site environmental monitor or other designated agents) within the Facility Site, the following actions shall be taken:*

a. *The NYSDPS and the Office shall be notified within forty-eight (48) hours of discovery and prior to any further disturbance around the nest, roost, or area where the species were seen exhibiting any breeding or roosting behavior;*

b. *An area at least five hundred (500) feet in radius around the active nest shall be posted and avoided until notice to continue construction, ground clearing, grading, maintenance or restoration activities are granted by the Office; and*

c. *The active nest(s) or nest tree(s) will not be approached under any circumstances unless authorized by the Office.*

ii. *If any dead or injured federal or NYS threatened or endangered bird species, or eggs or nests thereof, are discovered by the Permittee's on-site environmental monitor or other designated agent at any time during the life of the facility, the Permittee shall immediately (within 24 hours) contact the NYSDEC and the United States Fish and Wildlife Service (USFWS) for federally-listed species, to arrange for recovery and transfer of the specimen(s). The NYSDPS and the Office shall also be notified. The following information pertaining to the find shall be recorded:*

a. *Species;*
b. *Age and sex of the individual(s), if known;*
c. *Date of discovery of the animal or nest;*
d. *Condition of the carcass, or state of the nest or live animal;*
e. *GPS coordinates of the location(s) of discovery;*
f. *Name(s) and contact information of the person(s) involved with the incident(s) and find(s);*
g. *Weather conditions at the facility site for the previous forty-eight (48) hours;*
h. *Photographs, including scale and of sufficient quality to allow for later identification of the animal or nest; and*
i. *An explanation of how the mortality/injury/damage occurred, if known.*

Section 4.4(o)(9) - The provisions of subdivision (o) of this section shall remain in effect for as long as the relevant species is listed as endangered or threatened in New York State.

4.4.4 Threatened and Endangered (T&E) Species – Federal Coordination, Restrictions and Monitoring

Any federal coordination, restrictions, or monitoring required will be implemented in accordance with the Permit Holder's Nationwide Permit and the Siting Permit, to the extent applicable.

4.4.5 Cultural Resources Protection and Unanticipated Discoveries

All cultural resource protection measures will be implemented in accordance with the Cultural Resource Avoidance, Minimization and Mitigation Plan and be identified in the approved Plans, Profiles, and Detail

Drawings, where applicable. Significant ground disturbing activities[7] will be prohibited within archaeological avoidance areas. These areas will be flagged by the Contractor Teams in the field 14 days prior to construction in accordance with Section 4.4(e) of the Siting Permit. During the on-boarding process, construction personnel will be educated on the protection of cultural resources and identification of potential artifacts, that if discovered, would result in a stop work order in accordance with the Unanticipated Discovery Plan.

4.5 Site Restoration and Clean Up

Following construction, the site will be restored in accordance with the applicable Plans, Profiles, and Detail Drawings, Drainage Remediation Plan, the SWPPP, and the Agricultural Plan. In accordance with Section 4.2(e), within 14 days of the completion of all post-construction restoration, Hoffman Falls Wind will notify ORES and NYSDPS staff that all such restoration has been completed in compliance with the Siting Permit and all applicable compliance filings.

5.0 Post-construction Requirements

5.1 Operation and Maintenance

In accordance with Section 4.2(c) of the Siting Permit, prior to the completion of construction, Hoffman Falls Wind will notify the following entities with the contact name, telephone number, email and mailing address of the Facilities Operations Manager:

(1) Provide notice by mail to all persons residing within five miles of the Facility.
(2) Provide notice to local town and county officials and emergency personnel.
(3) Publish a notice by mail in the local newspaper of record for dissemination, including at least one free publication (if available).
(4) Provide notice for display in public places, which include, but not limited to, the Town Halls of the host municipalities, at least one library in each host municipality, at least one post office in each host municipality, the Facility website, and the Facility construction trailers/offices.
(5) File notice for posting on the ORES website.

This notification will also include:

(1) A map of the Facility
(2) A brief description of the Facility
(3) The construction schedule and transportation routes
(4) The name, mailing address, local or toll-free telephone number, and email address of the appropriate Facility contact for development, construction and operations
(5) The procedure and contact information for registering a complaint

[7] In the context of archaeological resources, significant ground disturbance is defined as (1) grading and excavation more than six inches deep; (2) grubbing, tree and stump removal; and (3) trenches more than three feet wide (collocated trenches [i.e., parallel collection lines] would also be seen as significant ground disturbance). The installation of driven piles/piers is not characterized as "significant ground disturbance."

(6) Contact information for the Office and the NYSDPS
(7) A list of public locations where information on the Facility, construction, and the Hoffman Falls Wind Project will be posted.

5.2 Invasive Species Monitoring

In accordance with the Project's ISCP and the Article VIII regulations (16 NYCRR Section 1100-10.2(f)(4)(iv)), post-construction monitoring of invasive species will be conducted for five years following the completion of construction and site restoration. This monitoring will utilize methods similar to those used during the baseline survey and will evaluate the effectiveness of the ISCP.

Following completion of each year's invasive species monitoring, a report of findings will be submitted to NYSDPS staff, the NYSDEC, the town, and the NYSAGM. The monitoring reports will be used to track achievement of the site restoration criteria applicable to invasive species outlined in Section 6.1(f)(4)(v) of the Siting Permit.

5.3 Agricultural Monitoring

On-site monitoring will be conducted in accordance with NYSAGM Guidelines. Following the completion of site restoration, Hoffman Falls Wind will provide monitoring of impacted agricultural land for a period of two complete growing seasons following the establishment of the desired crop.

At a minimum, monitoring will be conducted three times during the growing season (spring, summer, fall). Monitoring will identify any remaining impacts directly associated with the construction of the Facility on agricultural lands proposed to remain in or resume agriculture production, including impacts related to soil moisture, topsoil, vegetative growth, and agricultural infrastructure. Hoffman Falls Wind will attempt to retain the AM who was on-site during construction for follow-up monitoring and remediation (as needed) in agricultural areas. Monitoring will be limited to restored agricultural areas. Impacts to agricultural land that does not appear to be related to Project construction will be discussed with NYSAGM staff and considered for omission from future monitoring and remediation.

When performing post-construction monitoring, the AM will observe and document topsoil thickness, trench settling, rock content, soil compaction, agricultural drainage features (as previously described in Section 4.4.2), altered or repaired fencing and gates, and the establishment of desired crops, including desired crop productivity. Hoffman Falls Wind will consolidate each applicable growing season's observations into an annual report in accordance with the NYSAGM Guidelines, which will be provided to the NYSAGM upon request.

6.0 References

NYSAGM, "Construction Mitigation for Projects on Agricultural Lands", 07/2025, at: https://agriculture.ny.gov/system/files/documents/2025/08/constructionmitigationforprojectsonagriculturallands.pdf

Attachment 1

Environmental Protection Commitments

Attachment 1: Environmental Protection Commitments

Permit/Approval	Issuing/Approving Jurisdiction	Reference/Location
Article VIII Siting Permit	ORES	December 22, 2025
Hazard Determination pursuant to 49 U.S.C., Section 44718	Federal Aviation Administration	November 18, 2025
Consultation Pursuant to §14.09 of the New York State Historic Preservation Act	NYS Office of Parks, Recreation, and Historic Preservation	Ongoing
State Pollution Discharge Elimination System (SPDES) Letter of Authorization and 5-acre Authorization	NYS Department of Environmental Conservation (NYSDEC)	Ongoing
Application for Driveway Entrance/Boring Permit	NYS Department of Transportation	Ongoing
Town/County Highway Work Permits/Driveway Access Permits	Road Use Agreement Towns of Eaton, Fenner, Nelson, and Smithfield, and Madison County	Ongoing
Application for Road Cut/Bore Permit	Road Use Agreement Towns of Eaton, Fenner, Nelson, and Smithfield, and Madison County	Ongoing
Application & Driveway Permit	Road Use Agreement Towns of Eaton, Fenner, Nelson, and Smithfield, and Madison County	Ongoing

Attachment 2

Environmental Monitoring Group Resumes

Gregory S. Liberman
Principal

Education

- Bachelor of Science, Landscape Architecture, University of Massachusetts, Amherst, 2000

Professional Affiliations

- Former Chair, New York Water Environment Association (NYWEA) Stormwater Task Force
- Former Vice-Chairperson, Town of Dewitt Planning Board

Gregory is a Principal at EDR with over 25 years of experience specializing in environmental impact assessment, permitting, and resource area restoration. He has served as a Project Manager and Lead Investigator on a wide range of infrastructure, renewable energy, land development, and institutional development projects. He brings both deep project expertise and broad environmental insight.

Greg has extensive knowledge of environmental permitting regulations, including the National Environmental Policy Act (NEPA), the New York State Environmental Quality Review Act (SEQRA), Article VII and Article 10 of the New York Public Service Law, and state and federal wetland regulations. His experience spans natural resources management, stream and riverbank restoration, Geographic Information Systems (GIS) mapping and analysis, Rosgen-type stream surveys, stormwater pollution prevention planning, and wetland delineation and permitting. Greg has also held leadership roles as the Chair of the New York Water Environment Association Stormwater Task Force and Vice-Chair of the Town of DeWitt Planning Board.

Project Experience

Bluestone Wind Project, Towns of Sanford and Windsor, Broome County, NY – Managed the environmental review and permitting on this 33-turbine, 124-MW power project. Oversaw preparation of the Public Involvement Program Plan (PIP), the Preliminary Scoping Statement (PSS), and the Article 10 Application for the project. The Article 10 Application was submitted in September of 2018, deemed compliant in December 2018, and a Certificate of Environmental Compatibility and Public Need was issued in December 2019.

Heritage Wind Project, Town of Barre, Orleans County, NY – Managed the environmental review and permitting on this 200-MW wind power project. Oversaw preparation of the PSS and Article 10 Application for the project.

High Bridge Wind Project, Town of Guilford, Chenango County, NY – Managed the environmental review and permitting on this 30-turbine, 100-MW wind power project. Oversaw production of the PIP, PSS, and Article 10 Application for the project, along with various support studies (i.e., wetland delineations, visual impact assessment, cultural resources assessments).

Knapps Corner Replacement Substation, Central Hudson Gas & Electric, Town of Poughkeepsie, Dutchess County, NY – Managing the local Planning Board applications for the replacement and modernization of the Knapps Corners Substation in the Town of Poughkeepsie, New York. Oversaw all project design and permitting aspects, including environmental impact assessment, civil engineering and landscape architect, visual impact assessment, stormwater pollution prevention plan (SWPPP) preparation, and State Environmental Quality Review Act (SEQRA) compliance.

KM and TV 69-kV Transmission Lines, Central Hudson Gas & Electric, Towns of Wappinger and Poughkeepsie, Dutchess County, NY – Managed the local Planning Board applications and permitting for the replacement of over 8 miles of 69-kV transmission lines in Dutchess County, NY. Project included wetland delineations, cultural resources evaluations, visual impact assessment, environmental impact assessment, preparation of a SWPPP, and SEQRA compliance.

A&C 115kV Transmission Line Upgrades, Central Hudson Gas & Electric, Towns of Pleasant Valley, LaGrange, Wappinger & East Fishkill, Dutchess County, NY – Coordinated preparation of the Environmental Management & Construction Plan (EM&CP) for upgrades to an existing 115-kV line in support of an Article VII filing to the PSC. Also coordinated with EDR compliance monitoring staff regarding erosion and sediment control, agricultural protection, and Blanding's turtle impact avoidance.

Derrick Williams

Environmental Compliance Services Leader

Derrick is EDR's Environmental Compliance Services Leader, bringing over 10 years of experience in environmental compliance monitoring for energy generation and transmission projects in New York, Ohio, and Pennsylvania. He has a comprehensive understanding of state and federal environmental regulations and how they apply to construction activities, including sediment and erosion control, as well as the protection of wetlands, agricultural land, and cultural resources. Derrick is skilled at working collaboratively with construction managers, contractors, and regulatory agencies to achieve shared compliance goals. His responsibilities include conducting and overseeing environmental compliance and Stormwater Pollution Prevention Plan (SWPPP) inspections, coordinating with other monitors, and reviewing construction-related management plans such as invasive species control, Spill Prevention, Control, and Countermeasure (SPCC) Plans, and inadvertent return (frac-out) contingency plans. He also manages post-construction monitoring requirements related to invasive species management, agricultural restoration, and wetland mitigation.

Education

- Bachelor of Science, Geography & Environmental Science, Mansfield University of Pennsylvania, Mansfield, PA, 2014

Certifications

- NYS Erosion and Sediment Control Certificate Holder #033
- NYSDEC 4-Hour Erosion and Sediment Control Training
- Safe Land Certified
- Variforce Pipeline Certified
- CPR and First Aid Training, American Red Cross
- Wilderness First Aid Training

Employment History

- Environmental Compliance Services Leader, EDR, 2025–present
- Environmental Compliance Services Manager, EDR, 2018–2024
- Environmental Monitor, EDR, 2016–2018
- Environmental Compliance Monitor, EnSite Quality Control, 2015–2016
- Field Biologist/Crew Chief, Kleinfelder, Sayre, PA, 2014–2015
- Junior Party Chief, RETTEW Associates, Sayre, PA, 2013–2014

Project Experience

Morris Ridge Solar Energy Center, Livingston County, NY – Currently overseeing and assisting EDR field staff during daily on-site monitoring of this 117 MW solar project consisting of eight individual arrays in the Town of Mount Morris, NY. This project is the first project to enter into construction under the Office of Renewable Energy Siting (ORES) and associated 94-c permit.

Empire Wind 1 & South Brooklyn Marine Terminal, Brooklyn, NY – Currently provides oversight of environmental and aquatic monitors during construction of the onshore substation (approved under Article VII) and marine terminal upgrades (approved under SEQR) associated with this 810MW offshore wind energy generating facility.

Ohio Solar Energy Projects, Multiple Clients, OH – Currently overseeing and assisting EDR field staff during weekly on-site monitoring on eight separate solar energy projects ranging from 100MW to 500MW approved by the Ohio Power Siting Board (OPSB)**.** Manages onsite staff and provides target field efforts related to on-site environmental monitoring needed to assure compliance with all conditions of the project Certificate of Environmental Compatibility and Public Need.

H&SB Transmission Line Rebuild, Ulster & Greene Counties, NY – Currently overseeing and assisting EDR field staff during daily on-site monitoring for this Article VII project involving the rebuilding of this 24-mile 115-kV Transmission Line**.** Assists efforts of on-site environmental monitor to assure compliance with all conditions of the project Certificate of Environmental Compatibility and Public Need.

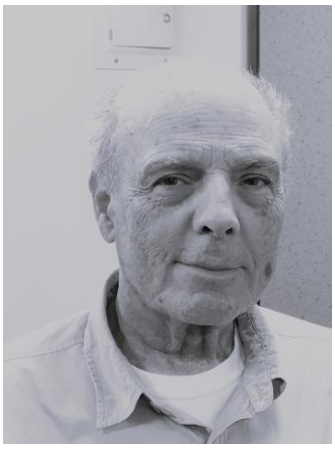
Bluestone Wind Project, Town of Stanford and Deposit, Broome County, NY – Managed EDR field staff during daily on-site monitoring for this Article 10 project involving construction of 26 wind turbines**.** Assists efforts of on-site environmental monitor to assure compliance with all conditions of the project Certificate of Environmental Compatibility and Public Need.

Roaring Brook Wind Project, Town of Martinsburg, Lewis County, NY – Managed EDR field staff weekly on-site monitoring for a project involving the construction of 20 wind turbines, 13 miles of access road, 13 miles of buried collection line, and 6 miles of overhead collection line**.** Responsibilities included oversight of contractor compliance with environmental permit conditions during the construction of the project, providing environmental training for construction personnel, participating in pre-construction planning/walk-overs, assist the on-site monitor in identifying and suggesting protective measures at sensitive environmental areas, and reviewing compliance reports to ensure accurate reporting of all federal, state, and local permits and approvals.

"Referenced Project Experience reflects the employee's combined work experience with current and past employers and is stated in the context of the role the employee held when the experience was gained."

John Dempsey

Senior Environmental Monitor



John is a Senior Environmental Monitor at EDR. He has over twenty-five years of experience in environmental planning and compliance with extensive inspection experience on large-scale power projects over eleven states. Positions include Agricultural Monitor [3rd Party] for New York State Department of Agriculture and Markets (NYSDAM); Compliance Monitor for Federal Energy Regulatory Commission (FERC); Lead Environmental Inspector managing pipeline construction inspection programs; and Independent Environmental Monitor (State of Wisconsin) overseeing compliance with state issued pipeline construction permits. Knowledgeable with construction requirements through variety of land use types including densely settled areas, agricultural, and sensitive resources. Additional experience as Environmental Planner and Project Manager preparing Environmental Assessments in compliance with the National Environmental Policy Act.

Education

- Master of Urban Planning, SUNY Buffalo, Buffalo, NY, 1995
- B.A., Anthropology (Archaeology), SUNY Buffalo, Buffalo, NY 1985

Certifications

- New York State Erosion & Sediment Control – SWPPP Training
- FERC Environmental Compliance Training, 2015
- Storm Water Management Operator (C1673) 2006 (renewed 2016, Michigan DEQ
- NCCER: Abnormal Operating Conditions – Field Operations, 2012

Project Experience

Equinor - Empire Wind 1 On-shore Substation & South Brooklyn Marine Terminal, Brooklyn, NY – Served as an environmental and aquatic monitor overseeing compliance with erosion and sediment control implementation, dredging operations, dewatering activities, bulkhead upgrades, and conducted stormwater inspections during construction of onshore substation (approved under Article VII) and marine terminal upgrades (approved under SEQR) in support of the 810 Mega-Watt offshore wind energy generating facility in Brooklyn, NY.

NEXTera Energy - Eight Point Wind Project - New York, Agricultural Monitor - Monitored construction compliance in agricultural areas along the project's 17-mile overhead transmission line (Article VII); and for the project's 25 wind turbine construction pads, access roads, and 36-miles of buried collector system (Article X). Duties included maintaining regular contact with the Project and construction personnel; contacting affected farmers regarding relevant agricultural operations concerns; and regular communication with NYSDAM for field visits and for resolution of specific farm resource concerns, as necessary.

Williams/Transcontinental Gas Pipeline Company, LLC - Atlantic Sunrise Project - Pennsylvania, FERC Compliance Monitor - Monitored environmental compliance during construction of Central Penn Line North (CPLN) Spreads 1 and 2 (58.8 miles of 30-inch diameter pipe); Unity Loop (8.45 miles of 42-inch diameter pipe); Chapman Loop (2.5 miles of 36-inch diameter pipe); and associated new compressor facilities. Regularly coordinated with landowners and construction management representatives to resolve a variety of issues during construction and restoration work.

Wolverine, MI - *Detroit Metro Access Pipeline,* Lead Environmental Inspector - Sole environmental inspector, ensuring compliance with State, County, and Township permits during construction of approximately 34 miles of 16-inch diameter pipeline thru Washtenaw and Wayne counties. A variety of land use types through six townships were crossed including: 25 regulated waterbodies, 47 wetlands, several residential and commercial areas with a local school and international airport. Over 100 guided bores and HDDs were also completed for this project. Reviewed construction areas with local SESC inspectors. Provided written daily and weekly inspection summaries in addition to Storm Water/NPDES inspection reports.

Christopher M. O'Connor
Senior Environmental Monitor

Education

- Bachelor of Science, Environmental Science, Plattsburgh University, Plattsburgh, NY, 2002
- Associate of Art, Liberal Arts, State University of New York Broome Community College, Dickinson, NY, 2000

Certifications

- NCCER Pipeline Maintenance Technician 2, #12345971

Christopher is EDR's Senior Environmental Monitor, with 23+ years of experience in environmental science and consultation, having worked on projects in California, New York, Pennsylvania, and Ohio. Christopher understands sediment and erosion control measures, spill prevention and reporting requirements, and the protection and restoration of sensitive resources such as wetlands, streams, cultural and agricultural lands. He also has experience with the identification of invasive species and implementing mitigation efforts, as well as identification of endangered species and protection of natural habitats. Christopher is experienced working alongside engineers, construction managers, contractors, and regulatory agencies to provide oversight during project construction. Christopher has a B.S. in Environmental Science from Plattsburgh State University, as well as certification for Applied Environmental Science Programs from William H. Miner Institute.

Project Experience

H&SB Transmission Line Rebuild, Ulster & Greene Counties, NY - Christopher is currently serving as the Environmental and Agricultural Monitor of this 24-mile 115kV Transmission Line rebuild project authorized under Article VII of NYS Public Service Law. Responsibilities include weekly stormwater inspection, pre-construction walkthroughs, oversight of access road construction, and BMP installations. Christopher works closely with the Client, Contractors, and NYSDPS Staff to communicate construction progress and track compliance with the Project's Certificate of Environmental Compatibility and Public Need.

Bluestone Wind Project, Broome County, NY - Christopher assisted as the Environmental and Agricultural Monitor during construction of this 124-megawatt project certified under Article 10 of NYS Public Service Law. Responsibilities included daily oversight of underground electric installation, civil construction, turbine erection, and restoration to ensure compliance with all permit requirements. Chris worked closely with EDR's Environmental Compliance Services Manager and NYSDPS Staff to communicate construction progress and resolve compliance related concerns. Additional duties included bi-weekly stormwater inspections.

Energy Transfer Mariner East I & II, Harrisburg, PA - *(prior to joining EDR)* Christopher served as the Environmental Inspector for facilities construction along the LNG pipeline projects. He monitored all work activities to ensure adherence with project specifications and design, as well as local, state, and federal environmental regulations. Christopher communicated with the Client, Contractor, and regulatory staff to resolve deficiencies and address concerns. Christopher oversaw clearing, BMP installation, pipeline installation, and restoration crews over miles of ROW and at many facility locations. Christopher also monitored active HDD sites and documented occurrences of inadvertent returns. He was also responsible for conducting weekly and storm events stormwater inspections.

Chesapeake Energy Baseline Water Quality Monitoring, Northeast Pennsylvania - *(prior to joining EDR)* Christopher served as Associate Project Scientist providing quality assurance and quality control over daily operations by managing workflow from one to twelve 2-person teams. He was also responsible for determining landowner and parcel conflicts, address, and coordinate verifications, conducting stray gas/emergency response, and maintaining remediation technologies. Project duties included water sampling and field testing of domestic and livestock sources, Trimble GPS logging of source location, and QRAE and PFID analysis.

Andrew S. Currier
Senior Environmental Monitor

Andrew is a Senior Environmental Monitor at EDR. He has over twelve years of experience in environmental inspection, consultation, and field leadership with extensive experience on large-scale power projects across multiple states. Positions include serving as and managing environmental and agricultural monitors on multiple projects approved under Article VII of New York State Public Service Law and the Federal Energy Regulatory Commission (FERC). He is experienced in working collaboratively with construction managers, contractors, and regulatory agencies to achieve shared compliance goals. Andrew is experienced in wetland and stream protection measures, agricultural mitigation practices, stormwater inspections, Best Management Practices, overseeing and mitigating Horizontal Directional Drilling fluid returns, and spill response practices.

Education

- SUNY Binghamton, Vestal, NY, 2006
- LAAS, Broome Community College, Binghamton, NY, 2004

Registration / Certifications

- OSHA-10 Certification, Cert. #26-007326175
- OSHA-30 Certification Cert. #26-607366557
- MT Qualified Compliance Inspector of Stormwater, Cert. # a243f1c7
- API 1169 Certification, Cert. # 84049
- FAA Part 107 sUAS Commercial Pilot License, Cert. #4496905
- MT Qualified Preparer of SWPP Plans, Cert. # a243f1c7
- American Red Cross Wilderness and Remote First Aid Training 6/30/15
- FERC seminar Cincinnati, OH 10/(6–8)/15
- Coordinated field testing/critical input of Williams-developed inspection report applications (iPad), 4/14-9/17

Project Experience

Empire Wind 1 On-shore Substation & South Brooklyn Marine Terminal, Brooklyn, NY – Served as an environmental and aquatic monitor overseeing compliance with erosion and sediment control implementation, dredging operations, dewatering activities, bulkhead upgrades, and conducted stormwater inspections during construction of onshore substation (approved under Article VII) and marine terminal upgrades (approved under SEQR) in support of the 810 Mega-Watt offshore wind energy generating facility in Brooklyn, NY.

Smart Path Connect, Oneida and Lewis Counties, NY - Lead Environmental Monitor/Environmental Compliance Manager - Provided daily environmental and SWPPP inspections for the Smart Path Connect Line 55-mile/4 substation electrical grid expansion in Oneida and Lewis Counties, NY. Managed (10) environmental monitors, one (1) agricultural inspector, (4) soil-probing technicians to provide adequate coverage of construction activities to maintain permit compliance and construction guidance. Acted as the point-of-contact on Project-generated spills, provided onboarding environmental orientation training, generated punch lists for maintenance items of subcontractors and resolved questions/concerns from subcontractors. Provided guidance to project management, construction management and contractors in addressing and overcoming environmental challenges in the field.

NextEra Energy Transmission NY, Canandaigua, NY - Lead Environmental Monitor - Provided daily environmental and SWPPP inspections for the Empire State Line 20-mile/2 substation electrical grid expansion in Niagara and Erie Counties, NY. Managed two (2) environmental monitors and one (1) agricultural inspector to provide adequate coverage of construction activities to maintain permit compliance and construction guidance. Acted as the point-of-contact with NYSDPS/NYSAGM/NYSDEC officials, making requests to modify project conditions, escorting on weekly site audits, notifying of spills, etc., and providing informal updates on field activities and conditions. Reviewed and authorized/denied disposal locations of various materials generated from the project. Provided guidance to project management, construction management and contractors in addressing and overcoming environmental challenges in the field

Columbia Gas/TC Energy (K1AS) Minneapolis, MN - Lead Environmental Inspector - Provided daily environmental and SWPPP inspections on a FERC-regulated emergency slip repair (replacement) on Columbia's K1AS line in central KY. Verified limits-of-disturbance boundaries, wetland and waterbody boundaries, and ensured all activities occurred within (and outside, when applicable) designated workspaces. Verified proper storage of hazardous materials, as well as reporting and verifying clean-up and disposal of hazardous material spills, as needed. Provided required Environmental Training for employees coming onto the project.

Molly Souhrada

Environmental Monitoring Services Specialist

Molly is an Environmental Monitoring Services Specialist at EDR with experience in conducting environmental awareness trainings, performing pre-construction walkthroughs, conducting agency site inspections, overseeing the installation of erosion and sediment controls, overseeing stream culvert installations, and provided guidance for mitigating inadvertent returns in sensitive resources. Molly has developed a strong working relationship with OPSB Staff and has a thorough understanding of their expectations specific to site conditions. She also serves as the lead environmental monitor in Ohio and is responsible for training staff, reviewing reports, performing noxious weed surveys, and serves as the project management assistant for EDR's Environmental Compliance Services Leader.

Education

- Bachelor of Arts, Environmental Biology, Ohio University, Athens, OH, 2022
- Associate of Science, Applied Science, Central Ohio Technical College, Newark, OH, 2018

Certifications

- Qualified Compliance Inspector of Stormwater
- Qualified Preparer of Storm Water Pollution Prevention Plans (Ohio)

Project Experience

Wheatsborough Solar, Erie County, Ohio – Serves as the environmental monitor for this 125 MW solar-generation facility. Monitoring includes tracking Certificate Compliance, oversight of HDD and inadvertent return mitigation along with tracking stormwater compliance. Works closely and regularly with OPSB staff during routine site inspections.

Powell Creek Solar, Putnam County, Ohio – Serves as the environmental monitor for this 150 MW solar-powered generation facility and associated transmission line. Works closely with Client and Contractor staff to track compliance with Certificate Conditions and stormwater compliance. Conducts monthly SPCC inspections of main power transformer.

Sycamore Creek Solar, Crawford County, Ohio – Served as the environmental monitor for this 117 MW solar-powered generation facility. Responsibilities included tracking compliance with Certificate Conditions, oversight of HDD and stream culvert installation. Now serves as the point of contact for other monitors in the field.

Ross County Solar, Ross County, Ohio – Served as an environmental monitor for this 120 MW solar-powered generation facility. Monitoring responsibilities included tracking compliance with various Certificate Conditions, oversight of tree clearing, HDD monitoring, and stormwater compliance.

Dodson Creek Solar, Highland County, Ohio – Served as an environmental monitor for a 117 MW solar-powered generation facility. Monitoring responsibilities include tracking compliance with various Certificate conditions, oversight of tree clearing, oversight of stream/wetland crossings, HDD monitoring and Inadvertent Return Mitigation, tracking stormwater compliance and oversight of restoration efforts.

Fox Squirrel Solar, Madison County, Ohio - Served as the environmental compliance monitor for a 5,000-acre site. Work includes on-site monitoring of construction activities such as horizontal directional drilling (HDD), stream crossings, and tree clearing. Prepares daily compliance reports and coordinates with on-site construction personnel and regulatory staff.

Morris Ridge Solar, Livingston County, New York – Served as secondary environmental monitor for this 117 MW solar array in the Town of Mount Morris, NY. The existing site consists of agricultural lands, and the farm project area is approximately 2,720 acres. This project is the first project to enter into construction under the Office of Renewable Energy Siting (ORES) and the associated 94-C permit. Assisted in creating pre-construction environmental training presentation.

Michael McDermott
Environmental Monitor

Education

- Bachelor of Art, Environmental Studies, SUNY Potsdam, Potsdam, NY, 2019

Certifications

- NYSDEC 4-Hour Erosion and Sediment Control Training

Michael is an Environmental Monitor at EDR. Michael is experienced serving as a dual Environmental and Agricultural Monitor on multiple utility-scale renewable energy projects certified by the New York State Public Service Commission (Article VII and Article 10) and the Office of Renewable Energy (Article VIII formerly Section 94-c). With more than 3 years of experience, he routinely assesses for compliance with the Environmental Management and Construction Plan (Article VII) and/or the Site Environmental and Engineering Plan (Article 10), New York State Pollutant Discharge Elimination System (SPDES) General Permit for Construction Activities, Spill Prevention, Containment, and Countermeasure (SPCC) Plans, the requirements of state and federal wetland permits, agricultural protection measures specified by New York State Department of Agriculture and Markets (NYSDAM) guidelines, and invasive species control plans. Prior to joining EDR Mike served as a Master At Arms for the U.S. Navy, and ended his military services career as a Team Leader with 2nd Battalion 108th Infantry Regiment, 43 Infantry Division of the New York National Guard. Mike continues demonstrating his leadership and discipline abilities while serving as an Environmental Monitor at EDR.

Project Experience

Morris Ridge Solar, Livingston County, NY – Currently serving as the lead environmental and agricultural monitor overseeing all construction related impacts associated with the Project. Mike's responsibilities include overseeing and documenting compliance with environmental permit conditions during the construction of the project such as providing environmental training for construction personnel, participating in pre-construction planning/walk-overs, conducting stormwater inspections, providing oversight of agricultural impacts and mitigation measures, and oversight of horizontal directional drilling (HDD) operations. Mike also served as the project's liaison for all regulatory agency visits during the construction of a 177 MW solar array in the Town of Mount Morris, NY. This project is the first project to enter into construction under the Office of Renewable Energy Siting (ORES) and associated 94-C permit.

Empire Wind 1 & South Brooklyn Marine Terminal, Brooklyn, NY - Served as an environmental and aquatic monitor overseeing compliance with erosion and sediment control implementation, dredging operations, dewatering activities, bulkhead upgrades, and conducted stormwater inspections during construction of onshore substation (approved under Article VII) and marine terminal upgrades (approved under SEQR) in support of the 810 MW offshore wind energy generating facility in Brooklyn, NY.

H&SB Transmission Line Rebuild, Ulster & Greene Counties, NY – Serves as the secondary environmental and agricultural monitor of this 24-mile 115kV Transmission Line rebuild project authorized under Article VII of NYS Public Service Law. Responsibilities include weekly stormwater inspection, pre-construction walkthroughs, oversight of access road construction, and BMP installations.

Bluestone Wind Farm, Broome County, NY – Assisted EDR's Senior Environmental and Agricultural Monitor with onsite environmental compliance monitoring during construction of a 26-turbine wind energy generating project authorized under Article 10 of the Public Service Law. During restoration Mike served as the sole Environmental and Agricultural Monitor. Michael is responsible for conducting stormwater inspections, attending onsite regulatory reviews, overseeing the restoration of agricultural lands, and observing and documenting construction activities for compliance with requirements of the project's Article 10 Certificate and other issued permits.

Gregory H. Heister
Environmental Monitor

Education

- BS in Natural Resources Management, SUNY College of Environmental Science & Forestry, Syracuse, NY, Expected 05/23
- AAS in Environmental & Natural Resources Conservation, SUNY College of Environmental Science & Forestry, Syracuse, NY, 05/21
- ASS in General Studies, Monroe Community College, Rochester, NY, 05/20

Greg Heister is an Environmental Monitor (EM) with a degree in Natural Resources Management from the State University of New York at Syracuse. Greg has served as an environmental and aquatic monitor on the Empire Wind 1 onshore substation (Article VII) and South Brooklyn Marine Terminal (SEQR) and as an environmental and agricultural monitor during construction of Morris Ridge Solar Energy Center (Article VIII formerly Section 94-c). He routinely assesses project for compliance with the Environmental Management and Construction Plan, New York State Pollutant Discharge Elimination System (SPDES) General Permit for Construction Activities, water quality monitoring plan, Spill Prevention, Containment, and Countermeasure (SPCC) Plans, the requirements of state and federal wetland permits, agricultural protection measures specified by New York State Department of Agriculture and Markets (NYSDAM) guidelines, and invasive species control plans. Greg previously served as a field technician at EDR, performing various wetland delineations and ecologic field service tasks before transitioning into environmental monitoring. Greg previously served as a Park Ranger Intern with the U.S. Army Corps of Engineers and served as a Staff Sergeant in the U.S. Air Force, where he excelled in aircraft electrical and environmental specialties.

Project Experience

Morris Ridge Solar Energy Center, Livingston County, NY - Served as the secondary environmental and agricultural monitor overseeing underground electric cable installation crews. Greg's responsibilities include oversight of erosion and sediment control implementation, topsoil preservation, identification of drain tile damages, dewatering activities, and horizontal directional drilling (HDD) operations during the construction of a 117 MW solar array in the Town of Mount Morris, NY. The existing site consists of agricultural lands, and the farm project area is approximately 2,720 acres. This project is the first project to enter into construction under the Office of Renewable Energy Siting (ORES) and associated 94-C permit.

H&SB Transmission Line Rebuild, Ulster & Greene Counties, NY – Serves as the secondary environmental and agricultural monitor of this 24-mile 115kV Transmission Line rebuild project authorized under Article VII of NYS Public Service Law. Responsibilities include weekly stormwater inspection, pre-construction walkthroughs, oversight of access road construction, and BMP installations.

Empire Wind 1 & South Brooklyn Marine Terminal, Brooklyn, NY - Served as an environmental and aquatic monitor overseeing compliance with erosion and sediment control implementation, dredging operations, dewatering activities, bulkhead upgrades, and conducted stormwater inspections during construction of onshore substation (approved under Article VII) and marine terminal upgrades (approved under SEQR) in support of the 810 Mega-Watt offshore wind energy generating facility in Brooklyn, NY.

Oxbow Hill Solar Project, Madison County, NY - Provided field support for avian surveys for a proposed solar energy generation facility of up to 140 megawatts.

Alle-Catt Wind Energy, Allegany, Cattaraugus, and Wyoming Counties, NY – Conducted baseline invasive species survey associated with a 116 turbine, 340 MW project being reviewed under Article 10 of the New York State Public Service Law.

Canisteo Wind Energy, Steuben County, NY – Conducted wetland delineations associated with a 120 turbine, 290 MW project being reviewed under Article 10 of the New York State Public Service Law.

Adam Maruna
Environmental Monitor

Adam is an Environmental Monitor and a graduate from The Ohio State University with a Bachelor of Science degree in Environmental and Natural Resources. Since joining EDR, Adam has gained experience in developing environmental awareness trainings, performing pre-construction walkthroughs, conducting agency site inspections, overseeing the installation of erosion and sediment controls, overseeing stream culvert installations, and provided guidance for mitigating inadvertent returns in sensitive resources. Adam is knowledgeable in Ohio Environmental Protection Agency (OEPA) rainwater and land development manual, OEPA Construction Activities General Permit (OHC000006), United States Army Corps of Engineers Nationwide Permits, and Spill Containment Countermeasures and Protection Plans (SPCC).

Education

- B.S., Environment and Natural Resources, The Ohio State University, School of Environment and Natural Resources, Columbus, OH, 5/2024

Project Experience

Union Ridge Solar, Licking County, OH - Serving as an environmental monitor for this 127 MW photovoltaic solar energy generating project located in a sub-urban portion of Licking County, Ohio. Monitoring responsibilities include tracking compliance with various Certificate conditions, oversight of tree clearing, oversight of stream/wetland crossings, oversight of Horizontal Directional Drilling (HDD), and tracking stormwater compliance.

Flint Grid Battery Energy Storage System, Licking County, OH – Served as the stormwater inspector and performed Notice of Termination filing during the tree clearing phase of this 200 MW Battery Energy Storage Facility.

Powell Creek Solar, Putnam County, OH – Serving as an environmental monitor for this 150 MW photovoltaic solar energy generating project located in a rural portion of Putnam County, Ohio. The studies developed for this OPSB certificate application were conducted during the pandemic, resulting in unique complexities related to travel and notification. EDR was responsible for all of the documents prepared for the OPSB certificate application and managed all aspects of the virtual public information meeting.

Fox Squirrel Solar, Madison County, Ohio – Serving as an environmental monitor for a 5,000-acre site. Monitoring responsibilities include on-site monitoring of construction activities such as horizontal directional drilling (HDD), stream crossings, stormwater compliance, and noxious weed monitoring. Prepares daily compliance reports and coordinates with on-site construction personnel and regulatory staff.

Dodson Creek Solar, Highland County, OH – Served as an environmental monitor for a 117 MW solar-powered generation facility. Monitoring responsibilities include tracking compliance with various Certificate conditions, oversight of tree clearing, oversight of stream/wetland crossings, tracking stormwater compliance and oversight of restoration efforts.

Sycamore Creek Solar, Crawford County, OH – Environmental compliance monitor for a 117 MW solar-powered generation facility. Monitoring responsibilities include tracking compliance with various Certificate conditions, oversight of HDD and inadvertent return mitigation, track stormwater compliance and oversight of stream and culvert installation.

Wheatsborough Solar, Erie County, OH – Environmental monitor for a 125 MW solar-powered generation facility. Monitoring responsibilities include tracking compliance with various Certificate conditions, oversight of HDD and inadvertent return mitigation and tracking stormwater compliance.

Ross County Solar, Ross County, Ohio – Served as an environmental monitor for this 120 MW solar-powered generation facility. Monitoring responsibilities included tracking compliance with various Certificate Conditions, oversight of tree clearing, HDD monitoring, and stormwater compliance.