

Construction Operations Plan – Revision 1

Hoffman Falls Wind

Towns of Fenner, Eaton, Nelson, and Smithfield
Madison County, New York

Revision	Date	Pages Affected
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Attachments

Attachment A. Minor Modification Request Form

Acronym List

ORES	Office of Renewable Energy Siting and Electric Transmission
BOP	Balance of Plant
NYS DPS	New York State Department of Public Service
NYS DEC	New York State Department of Environmental Conservation
NYS AGM	New York State Department of Agriculture and Markets
EM	Environmental Monitor
LOD	Limits of Disturbance
SWPPP	Stormwater Pollution Prevention Plan

Glossary of Terms

Permittee	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.

1.0 Introduction

1.1. Project Information

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). The Permittee will manage construction of the Facility in a manner that is consistent with applicable laws and regulations.

1.2. Purpose of this Construction Operations Plan

This Construction Operations Plan is intended to support tree clearing, civil construction activities, and the installation of the medium voltage electrical collection system, i.e., general construction activities (as detailed in approved Tree Clearing and Civil Design Drawings and Electrical Design Drawings). An updated version(s) of this plan will be provided as needed to support subsequent phases of construction. This plan will apply to all construction activities performed under the terms of the Balance of Plant (BOP) contract, including work performed by subcontractors. It includes control measures for processing minor modifications (Attachment A) and monitoring construction activities. The Hoffman Falls Wind Project Manager has the ability to revise and reissue this plan after consultation with the appropriate internal parties.

2.0 Pre-Construction Operations

2.1. Pre-Construction Meeting

In accordance with Section 4.4(c) of the Siting Permit, at least 14 days before the commencement of general construction activities, Hoffman Falls Wind will hold a pre-construction meeting with staff of ORES, the New York State Department of Public Service (NYS DPS), the New York State Department of Environmental Conservation (NYS DEC), the New York State Department of Agriculture and Markets (NYS AGM), the New York State Department of Transportation, municipal supervisors/mayors and highway departments, and county highway departments. The BOP contractor, the agricultural monitor and environmental monitor (EM) will also attend the pre-construction meeting. At the pre-construction meeting, the attendees will review items related to the planned construction activities including designated travel routes, construction worker parking and access routes, and the general Facility construction schedule.

2.2. Staking/Flagging

The Limits of Disturbance (LOD) and sensitive resource areas, including wetlands or streams and known archaeological sites, will be flagged at least two weeks before construction begins in accordance with Section 4.4(e) of the Siting Permit. The following procedures will be followed:

1. At least two weeks before tree clearing activities, a licensed surveyor will survey, and the Contractor, the Permit Holder, or the EM will stake or flag:
 - The approved LOD and/or limits of clearing.
 - The boundaries of any delineated wetlands, waterbodies, or streams that will be crossed when accessing construction areas.
 - The boundaries of any known archaeological sites identified in the approved Cultural Resources Avoidance, Minimization and Mitigation Plan (see Appendix K).
 - In addition, where denoted in the approved drawings, archaeological sites shall be surrounded with construction fencing and a sign stating restricted access with no mention of the reason.
 - Other areas needed for construction, including, but not limited to, turbine work areas, proposed infiltration areas for post-construction stormwater management, access roads, and laydown and storage areas.
2. The Contractor, the Permit Holder, and the EM will walk surveyed areas to verify the flagging/staking. The NYSDPS and ORES will be invited to the inspection with reasonable notice.
3. If the flagging/staking is sufficient, the Permit Holder will release the Contractor to proceed with the work once ORES has issued the Notice to Proceed. If the flagging/staking is not approved, the flagging/staking will be reconducted.

2.3. Stabilized Construction Entrances

Stabilized construction entrances will be installed to facilitate access prior to construction, as detailed in the approved Civil Construction Drawings and SWPPP.¹ This construction will involve the installation of erosion and sediment controls, stripping and stockpiling of topsoil, grading if necessary, and installation of geotextile and gravel stabilized with temporary stabilization methods. After the entrances have been stabilized, temporary erosion and sediment control structures can be removed.

2.4. Tree Clearing Staging Areas

Temporary staging areas for construction will be installed in each area prior to site preparation and tree clearing activities to facilitate parking and equipment storage. As detailed in the approved Civil Construction Drawings, temporary staging areas will be constructed out of timber mats and will not involve any soil disturbance.

¹ As noted in the approved Appendix A Drawings, the need for stabilized construction entrances will be verified in the field. Timber matting and/or the use of existing access roads may remove the need for stabilized entrances to be constructed in some instances.

3.0 Tree Clearing Operations

3.1. Access Routes

Existing access roads (e.g., farm roads and landowner driveways) will be used by the Contractor to access the site wherever possible to avoid and minimize disturbance during the tree clearing phase. Access routes for tree clearing are shown on the approved Tree Clearing and Civil Design Drawings (Appendix 05-A) and will be reviewed and approved by the Contractor and EM prior to use.

3.2. Tree Clearing Methods

The Project will utilize both hand operated chain saws as well as low ground pressure tree felling equipment (track mounted feller-buncher/harvester) to fell trees (see Section 3.4). The direction in which trees are to be felled will take into consideration the management of the felled trees and health and human safety. Trees are not to be felled into environmentally sensitive areas, wetlands, or streams unless otherwise noted on the approved drawings. Trees will be cut as close to the ground as practicable considering site conditions and the constraints of the equipment being used. Once cut, trees will be delimbed and cut into workable lengths.

Tree clearing will be conducted in accordance with Section 4.4(m)(8) of the Siting Permit. Specifically, cleared vegetation and slash will not be burned anywhere and will not be buried within a wetland or its associated adjacent area. In addition, vegetation clearing will comply with the provisions of 6 NYCRR Part 192, Forest Insect and Disease Control, and New York State Environmental Conservation Law §9-1303, and any quarantine orders issued thereunder, to protect trees and forests from invasive species.

A Stormwater Pollution Prevention Plan (SWPPP) has been prepared for tree clearing and civil construction activities. The Contractor will conduct all tree clearing and civil construction work in accordance with the SWPPP. Erosion and sediment controls are depicted on the approved Tree Clearing and Civil Design Drawings.

3.3. Disposal Methods

Small diameter trees and brush will generally be chipped and spread within the LOD. The wood chip depth at final reclamation will not exceed three inches (except for chip roads and temporary chip storage areas) and chips will not be stored or disposed of within wetlands, stream banks, delineated floodways, or active agricultural fields. Large diameter trees will either be cut into standard log lengths and stockpiled within the LOD or chipped and spread within the LODs with the same requirements as the brush.. Potential log storage areas are shown in the approved Tree Clearing Drawings (Appendix 05-A). These locations will be confirmed and adjusted in the field to minimize future construction interference. Felled trees will be stockpiled in a manner that maintains site access, does not affect site functions and processes, and supports ongoing tree clearing operations.

No export of chipped or cleared material is proposed during this phase of construction..

3.4. Tree Clearing Equipment

The approved Tree Clearing Drawings identify the proposed staging areas that will be temporarily used by workers during tree clearing. The following construction equipment will be used:

- Pickup Trucks
- Side by Side Utility Vehicles
- Chain Saws
- Feller Buncher
- Skid Steer and Backhoe
- Chipper/mulcher
- Fuel Trucks
- Stump Grinder
- Excavators
- Dozers

The following procedures shall be followed:

- All equipment and trucks are required to stay within the LOD. No parking or travelling outside the LOD is allowed.
- Equipment storage, refueling, maintenance, and repair will be conducted more than 100 feet from all wetlands, waterbodies and streams.
- Fuel or other chemical storage containers shall be appropriately contained and located at least three hundred (300) feet from wetlands, waterbodies, and streams.
- At the end of shift, all parked equipment must have a petroleum drip container underneath.
- All construction vehicles and equipment shall have a spill kit.
- All spills and other environmental issues must be immediately reported to the EM. Any leaks will be stopped and cleaned up immediately. Spill procedures will be followed in accordance with the NYSDEC Spill Guidance Manual.

4.0 Civil Construction Operations

Information describing construction operations can be found in the Civil Construction Plans, Profiles, and Detailed Drawings and therefore, a standalone Construction Operations Plan for civil activities has not been prepared. The notes section of the Tree Clearing and Civil Design Drawings, address the requirements of Section 6.1 (e)(2) of the Siting Permit, which are attached as Appendix 05-A.

4.1. Civil Construction Methods

Civil construction activities will be completed in accordance with the approved Civil Construction Plans, Profiles, and Detail Drawings included in Appendix 05-A. These documents provide all required construction details consistent with 16 NYCRR Section 1100-2.6 and 1100-2.17, including the identification of material lay-down areas, construction preparation areas, equipment staging locations, major excavation zones, and temporary soil stockpile areas. Civil construction will involve grading, excavation, roadway construction, installation of drainage features, trenching for underground utilities, foundation preparation, and other

earthwork activities necessary to support Project construction. Work will be performed using industry-standard methods and appropriate earth-moving equipment operating within the approved LOD.

Excavated soils will be managed in designated temporary stockpile areas shown on the construction drawings. All stockpiles will be stabilized and protected with erosion and sediment controls in accordance with the SWPPP. No soil, construction debris, or materials will be placed within wetlands, waterbodies, or regulated buffer areas. Material lay-down areas and construction preparation zones will be used for the temporary placement of construction materials, components, and equipment. These areas will be maintained in a clean and orderly manner and will operate in compliance with environmental protection measures established in the SWPPP and the Siting Permit. The temporary concrete batch plant is identified in the approved drawings and will be managed in accordance with all applicable regulatory requirements.

All civil construction activities will incorporate appropriate erosion and sediment controls, as depicted in Appendix 05-A. Construction personnel will implement the SWPPP throughout the duration of construction, including inspection, and maintenance of all stormwater and erosion control measures. A SWPPP has been prepared for civil construction activities. The Contractor will perform all civil work in full compliance with the SWPPP and applicable environmental requirements.

4.2. Civil Construction Equipment

The approved Civil Construction Drawings identify the proposed staging areas that will be temporarily used by workers during construction. The following construction equipment will be used:

- Pickup Trucks
- Side by Side Utility Vehicles
- Skid Steer and Backhoe
- Rollers
- Boring Machines
- Fuel Trucks
- Excavators
- Dozers
- Concrete Mixers
- Dump Trucks

The following procedures shall be followed:

- All equipment and trucks are required to stay within the LOD. No parking or travelling outside the LOD is allowed.
- Equipment storage, refueling, maintenance, repair will be conducted and concrete washouts will be placed more than 100 feet from all wetlands, waterbodies and streams.
- Fuel or other chemical storage containers shall be appropriately contained and located at least three hundred (300) feet from wetlands, waterbodies, and streams.
- At the end of shift, all parked equipment must have a petroleum drip container underneath.
- All construction vehicles and equipment shall have a spill kit.

- All spills and other environmental issues must be immediately reported to the EM. Any leaks will be stopped and cleaned up immediately. Spill procedures will be followed in accordance with the NYSDEC Spill Guidance Manual.

5.0 Field Change Minor Modifications

All field change Modification Requests shall be made in accordance with 16 NYCCR Section 1100-11.1, the Article VIII regulations, and the Siting Permit. All field change modifications to an existing permit must be reviewed and approved by ORES. Pursuant to 16 NYCRR Section 1100.11.0, ORES must determine whether any proposed change to a permit is either a "minor"² or "major"³ Permit modification. The following section describes the process for requesting modifications for proposed field changes to projects which Permittee considers to be "minor."

The following procedures shall be followed for requesting a minor modification. These procedures are based off ORES's Field Change Minor Modification Request Guidance, dated September 2023.

Step 1. Field Review. Upon identification of the need for a Facility design change during construction, the Permittee shall discuss the proposed change with the EM and the NYSDPS field representative at the site, and depending on the proposed change(s), the NYSDEC, NYSAGM representatives.

The field review should include a discussion of reports, memos, drawing revisions, and site visits that the parties determine are appropriate for the changes proposed.

Step 2. Complete the Minor Modification Request Form (Attachment A).⁴

Step 3. Provide the Draft Modification Request, which includes the completed Minor Modification Request Form and any other relevant supporting documentation, to ORES.

Step 4. ORES reviews and provides feedback on Draft Modification Request. ORES will respond with either (1) comments on the Draft Request, (2) initial concurrence that the changes are "minor," or (3) an explanation of why the proposed change may not constitute a "minor" modification.

Step 5. Permittee Files Minor Modification Request with ORES.

Once ORES provides (1) verbal or written comments requesting revisions to the Draft Request or (2) initial concurrence that the changes are "minor," the Permittee shall file the Minor Modification Request. Pursuant to 16 NYCRR Section 1100-11.1(a), the Permittee will include the following in the request:

² 16 NYCRR §1100-1.2. "Minor modification means a change in an existing permit condition or an approved compliance filing that is not a major modification

³ 16 NYCRR §1100-1.2. "Major modification means a change to an existing permit standard or condition likely to result in any material increase in any identified environmental impact or any significant adverse environmental impact not previously addressed by uniform or site-specific standards or conditions or otherwise involves a substantial change to an existing permit standard or condition."

⁴ Prior to construction, the Permittee shall consult with ORES regarding any "Field Change" forms they plan to use.

- a) A statement, including supporting information, setting forth the proposed permit or approved compliance filing modifications, identifying the existing condition(s) the Permittee is requesting to be modified and whether the Permittee considers such change to be a minor or major modification. The supporting information provided to ORES shall include the Minor Modification Request Form.
- b) A statement that there are no outstanding permit violations at the Facility.

Step 6. ORES Issues Formal Determination on Modification Request.

Pursuant to 16 NYCRR Section 1100-11.1(b), ORES shall review the request and inform the Permittee within 30 days as to its determination regarding whether the change constitutes a minor modification or a major modification subject to 16 NYCRR Section 1100-11.1(c).

Attachment A

Minor Modification Request Form

PROJECT NAME

ORES Case No.

Minor Modification Request Form

Introductory Information

a. Request Number:
b. Request Date: Click or tap to enter a date.
c. Title and Description of Permit Condition(s) / Compliance Filings to be Changed:
Attachment(s)? Yes
Photo(s)? No

Supporting Information

a. Description of Change(s):	
b. Justification for Change(s):	
c. Description of New Impact(s) Associated within the Change(s):	<i>Will the proposed changes result in any new impacts?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No
	<i>Describe the proposed new impacts:</i>
	<i>Are the proposed changes within the authorized limits of disturbance (LOD)?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No
	<i>Are the proposed changed within the authorized Facility Site?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No
	<i>Are the proposed changes within the previously defined study areas for the Facility?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No
<i>If No: Describe the proposed changes to the LOD, Facility Site, or study areas:</i>	
d. Entities Consulted or Briefed on Change(s):	
e. Wetlands/Streams:	<i>Will the proposed changes result in new or reduced impacts?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No
	<i>If Yes: Identify federal/state jurisdiction and ID(s):</i>
	<i>Describe the change in impact:</i>
f. Special Concern / Threatened / Endangered Species:	<i>Will the proposed changes result in new or reduced impacts?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No
	<i>If Yes: Identify federal/state jurisdiction and species:</i>
	<i>Describe the change in impact:</i>
g. Cultural Resources:	<i>Will the Limits of Significant Ground Disturbance change?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No
	<i>Were these areas previously surveyed?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No
	<i>Do these areas have elevated archaeological sensitivity?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No
	<i>If Yes: Describe any necessary consultation with SHPO and other stakeholders, any additional required surveys, and otherwise characterize the potential for the change to impact cultural resources:</i>
h. Agricultural Resources:	<i>Will the proposed changes result in new or reduced impacts?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No
	<i>If Yes: Attach an updated quantification of impacts to Mineral Soil Groups (MSG) 1 through 4, active agricultural lands, and active agricultural lands within MSG 1 through 4.</i>
	<i>Describe the change in impact, including any impacts to proposed agricultural co-utilization:</i>
i. Visual Impacts:	<i>Are changes to Visual Impacts Minimization and Mitigation Plan required?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No

	<i>If Yes:</i>	<i>Describe the change(s) required:</i>	
j. Stormwater Pollution Prevention Plan:	<i>Is an amendment to the approved SWPPP required? <input type="checkbox"/> Yes <input type="checkbox"/> No</i>		
	<i>Are the changes resulting from changes to the SWPPP? <input type="checkbox"/> Yes <input type="checkbox"/> No</i>		
k. Nationwide Permit:	<i>Do the changes have a nexus with any applicable Nationwide Permit(s) under Section 404 of the Clean Water Act? <input type="checkbox"/> Yes <input type="checkbox"/> No</i>		
	<i>If Yes:</i>	<i>Are the changes permitted under applicable Nationwide Permit(s)? <input type="checkbox"/> Yes <input type="checkbox"/> No</i>	
	<i>If No:</i>	<i>Describe any necessary consultation with USACE and other stakeholders:</i>	
l. Compliance Filing(s) and Siting Permit Updates:	<i>Will the proposed changes require updates to the language in the Siting Permit or approved Compliance Filings? <input type="checkbox"/> Yes <input type="checkbox"/> No</i>		
	<i>If Yes:</i>	<i>Describe details/language that need to be changed in the Siting Permit and any related compliance filings:</i>	
m. Local Law Compliance (unwaived provisions):	<i>Do the changes maintain compliance with all applicable local laws for which relief was not approved? <input type="checkbox"/> Yes <input type="checkbox"/> No</i>		
n. Local Law Compliance (waived provisions):	<i>Do the changes pertain to any local law provision for which relief was granted? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</i>		
	<i>If Yes:</i>	<i>Provide an analysis demonstrating that the change is within the scope and limitations outlined in the Siting Permit:</i>	
o. Review Requirements:	<i>Do the changes require review by a professional engineer? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</i>		
	<i>If Yes:</i>	<i>Are NYS PE Stamped drawings provided? <input type="checkbox"/> Yes <input type="checkbox"/> No</i>	
		<i>Is review required under New York State Uniform Fire Prevention and Building Code? <input type="checkbox"/> Yes <input type="checkbox"/> No</i>	
		<i>Is review required under State Pollutant Discharge Elimination System (SPDES) permit(s)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</i>	
		<i>Describe the applicable change(s) and any required consultation with stakeholders:</i>	