

Hoffman Falls Wind Project

Matter No. 23-00038

900-2.7 Exhibit 6

Public Health, Safety and Security

Revision 2

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EXHIBIT 6 PUBLIC HEALTH, SAFETY, AND SECURITY

(a) Statement and Evaluation of Adverse Impacts

Wind facilities are not known to pose significant public health risks – they do not rely on combustion, do not rely on fossil fuels which are hazardous/impactful to mine, refine, transport and store, do not generate toxic wastes such as ash or spent nuclear fuel, and the generation of electricity from wind facilities does not emit air pollutants which harm public health, safety, and the environment. By contrast, the public health and environmental benefits of renewable energy cannot be understated; those benefits have been a key driver of New York energy policy for decades and were a central component of the Climate Leadership and Community Protection Act (CLCPA) (NYCAC, 2023). The state anticipates that the CLCPA's renewable energy generation targets will result in improved air quality and increased health benefits across the state.

Air, water, and soil pollution represent “the largest environmental cause of disease and premature death in the world.” According to Dr. Tedros Adhanom Ghebreyesus, the current Director General of the World Health Organization (WHO), 90 percent of the world's population regularly breathes highly polluted, toxic air which far exceeds the levels that the WHO considers safe, which contributes to an estimated 25 to 30% of deaths from heart attack, stroke, lung cancer and chronic respiratory disease, and causes the premature, preventable deaths of more than 7 million people every year (Burnett et al., 2018). Those most impacted are children, elderly, and the poor. In New York, the hardest hit is those living in poverty in urban centers, who must breathe the pollution created by fossil fuel generating facilities located in their neighborhoods.

Conventional fossil fuel power generation is a major source of criteria air pollutants, which affect air quality, visibility, and public health. Those facilities release sulfur dioxide and nitrogen dioxide, which lead to the formation of particulate matter, ozone, and other acidic compounds, as well as mercury. Exposure to these pollutants can cause or aggravate lung diseases. In addition, fossil fuel combustion also produces volatile organic compounds (VOCs) like octane, benzene and others produced as evaporative emissions from carbon-based fuel and as emissions from incomplete combustion of fuel. Benzene is one of the most significant in terms of environmental degradation and public health (NYCAC, 2023). According to the New York State Public Service Commission's Final Generic Environmental Impact Statement for the Reforming the Energy Vision (REV) proceeding:

"One study estimated health impacts from fossil fuel energy sources at \$362 to 886 billion in economic value annually, based on premature mortality, workdays missed, and direct costs to the U.S. healthcare system resulting from PM_{2.5}, NO_x, and SO₂. The same study estimated that the economic value of negative health impacts was equal to approximately \$0.14 to \$0.31 per kWh. These costs may be even higher if greenhouse gas emissions are included."

The public health impact of fossil fuel power generation and climate change is significant. According to the New York State Energy Research and Development Authority (NYSERDA)'s ClimAID Technical Report (NYSERDA, 2011), "the consequences of climate changes for public health in New York State are likely to be dramatic, particularly for people who are more vulnerable because of age, pre-existing illness, or economic disadvantage. A range of potential health vulnerabilities related to climate change include:

- More heat-related deaths;
- Diverse consequences as a result of more intense rainfall and flooding events;
- Worsening air quality (due to increasing smog, wildfires, pollens, and molds) and related respiratory health impacts;
- Changing patterns of vector-borne and other infectious diseases; and
- Risks to water supply, recreational water quality, and food production due to shifting precipitation patterns.”

Many in the scientific community have also raised concerns about the relationship between poor air quality and communities hit particularly hard by the recent COVID-19 pandemic. Early studies have shown or posited a connection between poor air quality and poor outcomes for patients affected by COVID-19 infections. While the CLCPA and other state energy policies emphasize the urgent need to address climate change, the legislation and similar state initiatives have also focused on addressing broader air pollution problems, as a matter of equity and environmental justice, particularly in disadvantaged communities “burdened by cumulative environmental pollution and other hazards that can lead to negative public health effects.”¹ Some of New York’s dirtiest power plants are so-called “peaking” power plants which operate on the hottest days of the year, and produce the most air pollution, often in low-income neighborhoods and communities of color in the New York City area. Harmful effects of air pollution are not limited to humans—the natural environment suffers negative air pollution impacts ranging from acid rain and contamination of water sources to crop and forest damage, in addition to the wide range of threats posed by climate change. Moreover, climate change poses a much broader range of threats to human health than simply air quality issues—according to the New York State Department of Environmental Conservation (NYSDEC) (NYSDEC, 2015), the projected effects of climate change “threaten the livability and economic vitality of many of New York’s communities, as well as the health and safety of the residents of those communities” as a result of projected sea level rise, increased storms and storm-related damages, increased salinity in drinking water in communities along the Hudson River, expansion of invasive species and pests, droughts, and heat waves and cold events.

The proposed Facility will aid in reducing and eliminating significant water pollution and other harmful environmental effects which result from all phases of fossil fuel power generation, from extraction and refining to transportation, storage, use and disposal, as well as the using of cooling water at fossil fuel combustion facilities. The transition from fossil fuels to renewable energy in New York will not only play a critical role in the state’s efforts to combat climate change, as discussed herein, but it will aid efforts to reduce deadly air pollution, and advance principles of environmental justice by eliminating significant sources of pollution from the state’s most vulnerable communities.

As the Public Service Commission stated when it adopted the Clean Energy Standard (CES) in 2016, “one of the primary benefits” of the state’s transition to renewables will be “a reduction in total emissions of air pollutants resulting from fossil fuel combustion... Increased use of renewable energy sources leads to

¹ See, e.g., Article 75 of the New York Environmental Conservation Law, which focuses on efforts, such as by establishing a Climate Justice Working Group, to aid Disadvantaged Communities burdened by negative public health effects, environmental pollution and climate change.

improved air quality and societal benefits from reduced health impacts and increased employee productivity. For example, as air quality improves, state health care expenditures for treatment of asthma, acute bronchitis, and respiratory conditions may be reduced. Reduced exposure to fine particulates may avoid other health problems such as increased morbidity and exacerbation of respiratory and cardiovascular ailments.” Further, the Public Service Commission added, inaction in addressing air pollution and climate change is not an option, for “it is certain... that the consequences of inaction on air pollution and climate change are not acceptable.”

It is within this broader context that the Office of Renewable Energy Siting must consider the limited potential public health impacts associated with construction and operation of a wind facility like the Hoffman Falls Wind Project. Potential public health impacts associated with construction of this Facility are limited to typical risks associated with any commercial construction project. Once constructed, potential risks associated with the operation of the Facility are generally limited to maintenance activities and effects associated with movement of the blades and electrical components within the nacelle. Some of the unlikely risks associated with wind power include ice shedding, tower collapse, blade failure, and fire within the turbine. The presence of electrical equipment within the Facility Site carries some risk of a shock hazard. These areas will have perimeter controls (i.e., security fencing, signage) as is required by local law and the National Electrical Safety Code (NESC) to prevent potential injury. The Applicant’s Safety Response Plan includes information regarding these risks at the Facility, and how these risks will be mitigated or addressed (see Appendix 6-A).

Public health and safety impacts related to ice shedding are unlikely as any ice is likely to fall within established setbacks. Moreover, the effects of ice accumulation can be sensed by the turbines computer controls and vibration monitors and typically result in the turbine being shut down until the ice melts. Modern turbine technological controls, the implementation of setback limits, and restrictions on public access to turbine sites are expected to adequately protect the public from the risk of falling ice.

To the Applicant’s knowledge, there are no known instances where a member of the general public has been injured at an operating wind farm in the United States. Proper siting of the Facility, implementation of site security and safety response plans, and adherence to health and safety standards all but eliminate the potential risks from these types of incidents.

(1) Gaseous, Liquid, and Solid Wastes to be Produced During Construction and Operation

One of the advantages of producing electricity from wind is that it does not generate significant waste or air emissions during operation. Additionally, wind power generates only a minimal amount of liquid waste (oil from wind turbine gearboxes and electrical transformers) and solid wastes (cardboard, packaging material, and general refuse) during operation. With respect to construction, liquid and/or solid waste will be primarily limited to standard construction-related wastes (e.g., packaging materials) and will be handled by the contractor in accordance with all applicable laws and regulations pertaining to such wastes.

Facility construction will generate relatively minor amounts of solid waste, consisting primarily of plastic, wood, cardboard and metal packing/package materials, and construction scrap and general refuse (see Table 6-1). Construction materials will be collected from work areas and stored in dumpsters, where a private contractor will empty the construction materials on an as-needed basis, which is expected to be no less frequent than weekly and dispose of the refuse at a licensed solid waste disposal facility. The closest licensed landfill is the Madison County Landfill, located in the Town of Lincoln, Madison County, approximately 4.8 miles north of the Facility Site. The landfill accepts construction and demolition debris for approximately \$132 per ton (Madison County, 2023).

Facility construction will be initiated by clearing woody vegetation from all designated areas as indicated on the Final Construction Drawings. Trees cleared from the work area will be cut into logs and stockpiled on the edge of the work area or removed from the defined work area, while limbs and brush will be chipped and spread in upland areas of the Facility Site (safely away from water resources) so as not to interfere with existing land use practices. Landowners will have the right to any materials, including trees taken from their property during site preparation, and any trees not claimed by the landowner will be sold to a timber buyer. Timber products will be managed in accordance with applicable best management practices designed to prevent the spread of invasive species, such as those for firewood (NYSDEC, 2023).

During construction, sanitary facilities used by workers will consist of portable toilets, which will be emptied on an as needed basis by a qualified hauler. The Applicant intends to construct a new operations and maintenance (O&M) building in the Facility Site. This building will have a connection to an individual wastewater treatment (i.e., septic) system for use during Facility operations.

Waste to be produced during operations is summarized in Table 6-1.

Table 6-1. Source and Anticipated Volumes of Waste during Construction and Operation.

| Waste Type | | Volume | Management Method |
|------------------------------|--------------------------------|---|---|
| Construction | | | |
| General Refuse and Recycling | | 1,950 cubic yards | Contractor will collect and deposit all refuse and recycling into dumpsters staged at laydown yard and/or throughout the Facility Site. Recycling material may include steel, plastic, cardboard, etc. Dumpsters will be hauled to a landfill no less frequently than weekly. Estimated volume of 1,200 yards of refuse (one 30-yard roll-off per week for approximately 40 weeks) and 750 yards of recycling (one 30-yard roll-off per week for approximately 25 weeks) during the approximate 12-month construction duration. |
| Sanitary Facilities | | n/a | Portable toilets will be emptied on an as needed basis. |
| Woody Vegetation | | 5,000-10,500 cubic yards of chipped material 3,000-7,500 cubic yards of merchantable lumber/firewood | Trees cleared in accordance with the construction drawings will be cut into logs and stockpiled for use as merchantable timber or firewood in coordination with the landowners, or chipped and used in site stabilization. |
| Hazardous Materials | | n/a | Fuel may be stored on site to fuel equipment during construction. Fuel-related handling, storage and spills are addressed in the Facility's Preliminary Spill Prevention, Control, and Countermeasure Plan (Appendix 13-D). |
| Operation | | | |
| General Refuse and Recycling | | 360 cubic yards annually | The Applicant will collect and deposit all refuse and recycling into appropriate bins to be emptied on a regular basis. Estimated volume of one 30-yard roll-off per month (360 yards per year) but will fluctuate based on site activities. |
| Sanitary Facilities | | n/a | The O&M facility will be served by on-site water and septic systems per local regulations. |
| Hazardous Materials | Used hydraulic and gearbox oil | Up to two 55-gallon drums per week. | Hazardous or potentially hazardous materials including oil used in the wind turbines and to fuel equipment. The Applicant will contract with a hazardous waste removal company to dispose of hazardous materials at licensed waste disposal facilities. |
| | Used oil filters | Up to two 55-gallon drums per week. | |
| | Dirty rags/pig mats | Up to three 55-gallon drums per week. | |
| | Used grease tubes | Up to two 55-gallon drums per week. | |

(2) Anticipated Volumes of Wastes to be Released to the Environment

It is not expected that the construction or operation of the Facility will generate a substantial amount of waste, with the exception of general construction waste described above, which is not anticipated to be released into the environment. Brush and timber cleared during construction of the Facility is anticipated to be converted to firewood or merchantable lumber or chipped on-site and used in

stabilization. It is unlikely that vegetation clearing waste will need to be disposed of at a licensed off-site landfill.

In 2017, the US Department of Agriculture estimated that private forests in New York have an average standing volume of 2,187 cubic feet or 81 cubic yards per acre (Albright et al., 2020). Considering that the construction of the Facility would result in the clearing of approximately 171 acres of forested communities (including forested uplands, forested wetlands, and spruce/fir plantations), it is estimated that 10,000 to 15,000 cubic yards of woody vegetation may be cleared during the construction of the Facility. The manner in which this woody vegetation is processed, utilized, and/or disposed of is highly dependent on the means and methods employed by the contractor that is hired to construct the Facility and landowner preference at the time the Facility is constructed. However, as many of the forests within the Facility Site have been recently logged and may lack high quality timber, it is estimated that 30 to 50 percent of this total volume (3,000-7,500 cubic yards) would be converted to firewood or merchantable lumber, the remainder would be chipped.

The use of herbicides may be required during operation of the Facility for selective targeting of invasive species, or to control vegetation at the substation, but herbicides would not be used on a broad scale across the Facility Site. Herbicide treatments would be applied by a licensed New York State pesticide applicator that meets the requirements set forth in Title 6 NYCRR New York Codes, Rules and Regulations (NYCRR) Part 325, Application of Pesticides in accordance with NYSDEC approved herbicide and treatment measures. The type of herbicide(s) to be used, method of application, and schedule for application will be determined based on the locations of the targeted areas, an evaluation of herbicide safety and efficacy, and the particular invasive species to be controlled which will be detailed in the Applicant's Vegetation Management Plan and Invasive Species Control and Management Plan in compliance with 6 NYCRR Part 575 and in accordance with Section 94-c pre-construction compliance filings.

(3) Treatment Processes to Minimize Wastes Released to the Environment

This section is not applicable to the proposed Facility.

(4) Procedures for Collection, Handling, Storage, Transport, and Disposal for Wastes

See Exhibit 6(a)(1) of this exhibit for a discussion of waste disposal practices.

(5) Maps of Study Area and Analysis

See Figure 6-1 for Public Health and Safety maps which depict publicly available data within a 5-mile radius of the Facility, including:

- Known public water supplies;
- Fire/police/Emergency Medical Services (EMS) stations;
- Hospitals and emergency medical facilities;

- United States Environmental Protection Agency (USEPA)-regulated facilities;
- Dams, bridges, and related infrastructure;
- Existing known hazard risks (flood hazard zones, storm surge zones, areas of coastal erosion hazard, landslide hazard areas, and areas of geologic, geomorphic or hydrologic hazard);
- Explosive or flammable materials transportation or storage facilities;
- Contaminated sites; and
- Local risk factors.

The maps were prepared using data from the NYS GIS Clearinghouse, Federal Emergency Management Agency (FEMA), local municipalities, NYSDEC, New York State Department of Health, and the United States Geological Survey (USGS). One police station and eight fire/emergency medical services stations were documented within 5-miles of the Facility. None of these features were documented within the Facility Site. The following assets were not identified within a 5-mile radius of the Facility: hospitals, storm surge zones, coastal erosion hazards, landslide hazard areas, or other geologic/geomorphic/hydrologic hazards.

(6) Significant Impacts on the Environment, Public Health, and Safety

As indicated in Section 6(a)(1)-(4), the Facility is not expected to result in any significant public health or safety concerns associated with gaseous, liquid, or solid wastes. The potential public health and environmental benefits of the Facility, particularly as it relates to climate change, are discussed further in Exhibit 17(g).

General measures to minimize impacts from construction and operation of the Facility include compliance with the conditions of various local, state, and/or federal regulations that will ultimately govern Facility construction and operation as well as the commitments made by the Applicant throughout this Application. For instance, federal permitting required by the U.S. Army Corps of Engineers (USACE) will serve to protect water resources, along with implementation of a state-approved stormwater permit. Highway agreements and coordination at the town, county, and state level will assure that congestion and damage to highways in the area is avoided or minimized and that traffic safety concerns are addressed. For a detailed analysis of impact minimization measures for a given resource, see the appropriate exhibit in this Application (e.g., for impact minimization measures associated with noise see Exhibit 7).

(7) Mitigation Measures

In the Applicant's experience, when a project such as the Facility is properly sited and designed, mitigation measures are generally not necessary because significant impacts to public health and safety typically do not occur. However, the Applicant has identified measures to avoid and mitigate potential impacts to public health and safety in the event they could occur, which has generally included the following considerations:

- Adhere to setbacks detailed in Exhibit 5.
- Develop and implement various plans to minimize adverse impacts to air, soil, and water resources (which can directly impact public health), including dust control procedures, a Stormwater Pollution Prevention Plan (SWPPP), and Spill Prevention, Control, and Countermeasures (SPCC) plan.
- Document existing road conditions and undertake public road improvement/repair as required to mitigate impacts to local roadways (Exhibit 16).
- Develop and implement the Safety Response Plan (Appendix 6-A).
- Develop and implement a Site Security Plan (Appendix 6-B).

For a detailed analysis of impact mitigation measures for a given resource, see the appropriate exhibit in this Application (e.g., for impact mitigation measures associated with noise see Exhibit 7, for information related to the Preliminary SWPPP and Preliminary SPCC see Exhibit 14, for impact mitigation measures associated with wetlands see Exhibit 14).

The Facility will also comply with all relevant Uniform Standards and Conditions as established in Subpart 900-6 of the 94-c regulations, which will further serve to mitigate impacts.

(8) Proposed Monitoring

The Applicant is committed to developing and operating the Facility in a safe and environmentally responsible manner. In addition to the minimization and mitigation measures described/referenced above, an Environmental Monitoring Plan will be implemented prior to the start of construction, and the Applicant will provide funding for an independent, third-party environmental monitor to oversee compliance with environmental commitments and permit requirements during construction of the Facility.

In addition, the Section 94-c regulations specifically require monitoring to assess the impacts on a particular type of resource. For monitoring associated with a specific resource, see the appropriate exhibit in this Application (e.g., for monitoring associated with agricultural land see Exhibit 15).

Prior to construction, an extensive quality assurance/quality protocol will be implemented to monitor construction of the Facility and ensure that the materials and equipment meet all applicable standards and assure conformance of Facility design, engineering, and installation. Once the Facility has been constructed, periodic inspections will be conducted as part of the Facility Maintenance and Management Plan, which will be developed prior to construction. Among other things, the inspections will examine turbine components such as blades and towers for wear and tear and any issues or red flags that could cause a blade failure, tower collapse or other potential health and safety problems.

(b) Plans for Site Security during Facility Operation

It is anticipated that the Applicant will own and operate the Facility, except for the point of interconnection (POI) substation, which will be owned and operated by National Grid. The Applicant will be responsible for site safety and security during operation of the Facility, excluding the POI substation. The Applicant has developed a Site Security Plan (Appendix 6-B), which includes the following measures to be implemented during Facility operation.

(1) Access Controls

All private access roads shall be gated to restrict access to the general public as needed. Gates will be required to be kept locked when maintenance activities are not occurring. Signage will be installed on gates warning the public not to trespass and of possible hazards. During both construction and operation, all contractors must inform the Site Construction Manager or Facility Manager of the portion of the Site they intend to visit and the approximate date and time.

All wind turbines have access doors at their bases that are closed and locked except when Facility personnel are inside. Signs will be posted at every wind turbine stating that it is a federal offense to damage a wind turbine and that no trespassing is allowed on the Facility Site.

The O&M building and adjacent Facility collection substation will be locked when unoccupied, and access will be granted only to authorized personnel. A security camera or similar detection device may be installed at the primary entrance of the O&M facility and collection substation. In addition, the collection substation will include an 8-foot security fence with three rows of barbed wire on top and signs will be installed along the fence stating high voltage and no trespassing. Should unauthorized access, vandalism, or damage occur to either, additional intrusion detection methods may be considered, as necessary.

The POI substation, which will be owned and maintained by National Grid, will be constructed to National Grid's standards, and will include an 8-foot security fence with three rows of barbed wire on top. Signs will be installed along the fence stating high voltage hazard and no trespassing. Except for installing the above security features at the time of construction, POI substation security will be the sole responsibility of National Grid.

(2) Electronic Security and Surveillance Facilities

The building used as the O&M building will have alarm systems installed and/or video monitoring in place. Electronic security is not currently proposed for the Facility. However, should electronic security measures, such as triggered alarms at gate entrances or touchpad entry to various components, be determined necessary following consistent issues with vandalism or trespass, or other security issues, these measures will be considered and/or approved by the Facility Manager. Additionally, surveillance of the Facility is not planned at the outset of operation. Rather, should vandalism and trespass become

issues for the project, intrusion detection methods, most likely in the form of security cameras, will be installed in these problem areas as determined necessary by the Facility Manager.

(3) Security Lighting

Security lighting will be installed at all turbines, the POI substation, collection substation, permanent MET towers, and the O&M building. Security lighting that fails will be promptly repaired or replaced. Maintenance inspections of turbines will include checking site security lighting.

The Applicant has included basic information regarding security lighting in the Site Security Plan (Appendix 6-B). A Lighting Plan providing more detailed information is included within Appendix 8-B to this Application.

(4) Aircraft Safety Lighting

The Applicant submitted the turbines and towers for Obstruction Evaluations to the Federal Aviation Administration (FAA) on August 24, 2023. As of the filing of this Application, the Applicant has not received a hazard determination from the FAA. The Applicant has also filed a Notice for a Marking and Lighting Study to the FAA on September 1, 2023, which included Aircraft Detection Lighting System(s) (ADLS) options to seek a determination approving the use of ADLS as a lighting option.² ADLS is a light mitigation technology that utilizes one or more surveillance radar to track aircraft in proximity to the wind turbines. If an aircraft flies toward, or through an area around the project, then the lights must be activated. See Exhibit 8 for additional discussion on the use of ADLS.

(5) Cyber Security Program

The Applicant will comply with all North American Electric Reliability Corporation (NERC) Critical Infrastructure Protection (CIP) standards and maintain an audit-ready Internal Compliance Program. These mandatory Reliability Standards include CIP Standards 002 through 011, which address the security of cyber assets essential to the reliable operation of the electric grid (NERC, 2021). Physical access to critical cyber infrastructure areas will be restricted to those individuals who must have access. Where feasible, access into cyber secured restricted areas will be monitored by personnel and/or video surveillance. Periodic validation of compliance with the applicable standards by an independent auditor will be carried out at least every 15 months.

In addition, the Applicant has implemented several corporate policies that address strong password encryption, two-factor authentication, an incident response plan and playbook, as well as off-site storage of log files and backup of critical assets. See Appendix 6-B for a detailed discussion of the Applicant's cybersecurity program.

² Note, to the Applicant's knowledge the FAA has not approved dimmable lighting for any tall structures.

(c) Safety Response Plan

A Safety Response Plan that provides emergency response direction for all phases of the Facility, including pre-mobilization, construction, and operation of the Facility, has been developed by the Applicant and is included as Appendix 6-A to this Application. The Safety Response Plan specifies the contingencies related to Facility operation that would constitute a safety or security emergency, as well as the procedures to follow during such an event. The Safety Response Plan specifies the procedures to follow in the event of an emergency as well as the contingencies related to Facility operation that would constitute a safety or security emergency.

(1) Identification of Contingencies that Would Constitute an Emergency

The Facility poses little risk to the community, given the setback requirements established by local law and NERC safety standards which govern the location of turbines and ancillary equipment relative to people and structures near the Facility which are in place to prevent potential harm in the event of an emergency. Accordingly, the Safety Response Plan focuses primarily on supporting the safety of persons at the Facility (i.e., employees and authorized visitors) in the event of a major emergency; potential community concerns are addressed in the Safety Response Plans as appropriate. The Safety Response Plan contains information regarding the following emergency situations:

- Medical emergency;
- Fire emergency;
- Earthquake;
- Electrical emergency;
- Hazardous material spills or releases;
- Severe weather conditions (electrical storms, tornadoes, hurricanes, flooding and snowstorms); and
- Physical security threats or criminal activity.

For each emergency contingency, the Safety Response Plan contains procedures and guidelines to be followed in the event an incident arises, together with a checklist that identifies key tasks and specifies who is required to complete the task.

(2) Emergency Response Measures by Contingency

As previously noted, in the event an emergency response measure becomes necessary, the Safety Response Plan provides detailed instructions and guidelines to be followed by site personnel, the public, and emergency responders for each of the above listed contingencies. See Appendix 6-A for a description of the emergency response measures by contingency.

(3) Community Notification Procedures by Contingency

The Safety Response Plan includes protocols for the notification of local first responders/emergency services, landowners, environmental agencies, and the community in the event of an emergency. Local first responders/emergency services will be notified of all emergencies for which their assistance is, or may be, required. The criteria for determining whether to contact local emergency responders are spelled out in the Safety Response Plan for each contingency (e.g., medical assistance, fire, hazardous material spill or release, earthquake, severe weather, physical security threat).

In addition to direct outreach to emergency responders via 911, the Facility Manager will assess each emergency to determine whether outreach to the community generally and/or to host and adjacent landowners may potentially be required and contact the Director of Communications as appropriate. The Director of Communications will decide whether reporting is necessary and will notify community officials and/or landowners of the emergency via telephone as appropriate. Reports of spills or releases that require immediate outreach to federal, state and/or local authorities will be made by the Facility Manager.

(4) Onsite Equipment to Respond to Fire Emergencies or Hazardous Substance Incidences

The Safety Response Plan describes equipment available for responding to fire emergencies or hazardous substance incidents (i.e., Safety Data Sheets [SDS] for all hazardous material on site, fire extinguishers, and personal protective equipment). In general, equipment to respond to fire emergencies or hazardous substance incidents will be stored in the O&M facility. The Applicant has also compiled a Preliminary SPCC Plan which includes further information regarding hazardous material spills (see Appendix 13-D).

The Facility will comply with the New York State Uniform Fire Prevention and Building Code for all proposed Facility components, as applicable. It should be noted that the Uniform Code does not regulate wind turbine generators. As indicated in Exhibit 24, the Applicant will work with the Towns to arrange payment to the Towns or consultant services for the review, approval, inspection, and compliance certification work required to comply with the Uniform Code.

First responders (i.e., individuals designated or trained to respond to an emergency) are not expected to fight fires in the turbine nacelle. Current best practice is to let such fires burn out unless they can be immediately extinguished by Facility personnel who are working in the nacelle at the time the fire starts. Emergency responders may not have direct access to turbines or the collection substation through access roads due to security concerns and landowner preferences.³ However, any time that Facility operators and maintenance personnel are at a turbine site or substation, the access road gates will remain unlocked, so medical personnel can access the location should an emergency arise.

³ If emergency service providers identify potential turbine or substation access needs, the Applicant will coordinate with the affected parties to ensure site safety and security is maintained and any necessary access is provided.

(5) Evacuation Control Measures by Contingency

The proposed wind energy Facility will not create safety concerns of a magnitude that would necessitate a community evacuation. Accordingly, the Safety Response Plan focuses on evacuation of Facility personnel, detailing procedures covering evacuation at ground level and special procedures applicable to turbine evacuations. In addition, the Safety Response Plan includes specific instructions relating to evacuations in relation to each of the contingencies identified above (e.g., hazardous materials, earthquake, severe weather, and physical security threats).

(6) Contingency Plans for Fire Emergencies or Hazardous Substance Incidences

The Safety Response Plan contains a protocol and guidelines to be followed in the event of a fire or hazardous substance emergency, as summarized in Exhibit 6(c)(5). In addition, all Facility personnel will perform training drills in coordination with emergency responders at least once annually to provide an understanding of employees' duties in assisting in a safe and orderly evacuation, communication requirements, etc. The Applicant will solicit and consider local emergency responder input as part of any annually scheduled training.

Fires at substations generally occur at oil-containing equipment or at storage tanks in situations where backup generators utilize liquid fuels. The major oil-containing equipment will be constructed with an oil containment system consisting of an above grade feature (earthen berm or concrete pit), or a below grade secondary containment system (loose stone and/or geomembrane liner), either of which will provide containment in the event of a fire. The proposed POI substation will contain a gravel pad and access road. The gravel pad underlying the substation and the access road, which will consist of gravel and compacted stone, will aid in mitigating the spread of fire.

In addition, a Preliminary SPCC Plan has been prepared and will be implemented for both the construction and operation phases of the Facility (see Appendix 13-D). The Preliminary SPCC Plan provides an assessment of potential hazardous substances that could be utilized during the construction and operation/maintenance of the Facility as well as detailed protocols to be followed in the event of minor and major hazardous substance discharge events and a Facility-wide inventory of spill response equipment. Most potentially hazardous substances onsite consist of petroleum products such as diesel fuel, hydraulic oil, mineral oil, and lubricating oil (see Exhibit 13 for additional information on the Preliminary SPCC Plan).

The two nearest hospitals to the Facility are the Oneida Health Hospital and the Community Memorial Hospital, which are located approximately 15 miles northeast and 17 miles south of the Facility, respectively. These two hospitals offer general hospital and emergency services; however, neither of these facilities has a certified trauma center or burn unit. The nearest hospital that offers advanced emergency services is the Upstate Community Hospital, which is located 26 miles northwest of the Facility. This hospital is a certified Level I Trauma Center and houses the Clark Center Burn Unit.

(7) Emergency Responder Training Drills

As described in Exhibit 6(c)(6), the Applicant will conduct training drills with local emergency responders at least once annually.

(d) Provision of Security and Safety Plans to NYS Division of Homeland Security

The Safety Response Plan (Appendix 6-A) and the Site Security Plan (Appendix 6-B) were provided to the New York State Division of Homeland Security and Emergency Services on October 04, 2023. Copies of the correspondence are provided in Appendix 2-B.

(e) Provision of Security and Safety Plans to Local Office of Emergency Management

The Facility Site is not located within any part of a city that has a population over one million and therefore a review by the local office of emergency management is not required by the Section 94-c regulations. As noted elsewhere in this Exhibit, the Applicant has consulted with local emergency responders and relevant municipal agencies to ensure that its safety and security plans appropriately consider local conditions, risks, and resources.

The Safety Response Plan (Appendix 6-A) and the Site Security Plan (Appendix 6-B) were provided to the code enforcement official for the Towns of Eaton and Smithfield on September 12, 2023, the Eaton Town Supervisor on September 12, 2023, the Smithfield Town Supervisor and Town Board on September 12, 2023, and the Fenner Town Supervisor and Town Board on September 13, 2023. On November 28, 2023, the Applicant emailed the above representatives requesting that any feedback on the Site Security Plan and Safety Response plan be provided by December 15, 2023. To date, no responses have been received by these entities.

Print copies of the Site Security Plan and Safety Response Plan were mailed to local emergency responders on October 04, 2023. On November 28, 2023, the Applicant led a meeting with local emergency responders to review the Site Security Plan and Safety Response Plan in a group setting. All local emergency responders identified in this exhibit were invited and representatives from Morrisville Fire Department, Smithfield Fire Department, and Smithfield-Eaton Volunteer Ambulance Corps (SEVAC) were able to attend. The Applicant spoke with a representative of the Cazenovia Area Volunteer Ambulance Corps (CAVAC) on November 14, 2023, and they indicated they had a scheduling conflict and would not be able to attend. Following the conversation, the Applicant sent a follow-up email to CAVAC and provided a digital copy of the Safety Response Plan and Site Security Plan, as well as a request for any feedback. Comments from attendees of the November 28, 2023 meeting were folded into the plans (see 2-B). Emergency responders who could not attend the meeting were emailed on December 19, 2023, with a summary of what was discussed and a request for any additional feedback on the draft plans.

REFERENCES

Burnett, Richard, Hong Chen, M. Szyszkowicz, N. Fann, B. Hubbell, C. Arden, et al. 2018. *Global estimates of mortality associated with long-term exposure to outdoor fine particulate matter*. Proceedings of the National Academy of Sciences of the United States of America. V 115 (38), pages 9592-9597. Available at: <https://www.pnas.org/doi/10.1073/pnas.1803222115> (Accessed January 2022).

Madison County. 2023. 2023 Punch Card Schedule. Available at: <https://www.madisoncounty.ny.gov/2434/2023-Punch-Card-Schedule>. (Accessed March 2023).

NYCAC. 2021. *Draft Scoping Plan, Appendix F: Environmental and Health Data for Quantifying Health Benefits of Climate Policy*. Available at: <https://climate.ny.gov/Our-Climate-Act/Draft-Scoping-Plan> (Accessed January 2022).

New York State Department of Environmental Conservation (NYSDEC). 2015. *Observed and Projected Climate in New York State: An Overview*. Developed for the Community Risk and Resiliency Act (CRRA) Drafting Teams. Available at: <https://nysba.org/NYSBA/Meetings%20Department/2018%20Annual%20Meeting/Coursebooks/Environmental%20Electronic%20Materials/ALL%20SPEAKER%20MATERIALS%20COMBINED.pdf> (Accessed January 2022).

NYSDEC. 2023. *Firewood and Invasive Pests*. Available at: <https://www.dec.ny.gov/animals/28722.html> (Accessed March 2023).

North American Electric Reliability Corporation (NERC). 2021. *Critical Infrastructure Protection Compliance*. Available at: <https://www.nerc.com/pa/Stand/Pages/CIPStandards.aspx> (Accessed January 2022).

New York State Energy Research and Development Authority (NYSERDA). 2011. *Responding to Climate Change in New York State (ClimAID)*. Available at: <https://www.nyserda.ny.gov/About/Publications/Research%20and%20Development%20Technical%20Reports/Environmental%20Research%20and%20Development%20Technical%20Reports/Response%20to%20Climate%20Change%20in%20New%20York> (Accessed January 2022).

Albright, Thomas A., Brett J. Butler, Susan J. Crocker, Jason M. Drobnack, Cassandra M. Kurtz, William H. McWilliams, Randall S. Morin et al. *New York Forests 2017*. Resource bulletin NRS-121 2020: 118.