

HECATE ENERGY COLUMBIA COUNTY 1 LLC SHEPHERD'S RUN SOLAR PROJECT

Matter No. 24-00103

§ 900-2.7 Exhibit 6

Public Health, Safety, and Security

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Acronym List

CLCPA	Climate Leadership and Community Protection Act
ECM	Environmental Compliance Manager
ECMP	Environmental Compliance and Monitoring Program
EM	Environmental Monitor
FEMA	Federal Emergency Management Agency
FIRM	flood insurance rate map
LOD	limit of disturbance
NYCRR	New York Codes, Rules, and Regulations
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
NYSEG	New York State Electric and Gas
Operations SSP	Operations Site Security Plan
ORES	New York State Office of Renewable Energy Siting
SRP	Safety Response Plan
SSP	Site Security Plan

Glossary of Terms

Applicant	Refers to Hecate Energy Columbia County 1 LLC, the entity seeking a siting permit for the Project from the Office of Renewable Energy Siting (ORES) under Article VIII of the New York State Public Service Law. ¹
Point of Interconnection	Refers to the Craryville 115 kilovolt (kV) substation owned by New York State Electric and Gas (NYSEG) on the Craryville-Klinekill and Churchtown-Craryville 115 kV transmission lines.
Project	Refers to the proposed Shepherd's Run Solar Project, a utility scale solar project that will be comprised of solar arrays, inverters, access driveways, electrical collection lines, collection substation, construction staging areas, fencing and plantings, located on private land in the Town of Copake, Columbia County, New York.
Project Area	Refers to those privately-owned parcels under option to lease, purchase, easement or other real property interests with the Applicant in which all Project components will be sited.
Project Footprint or Limit of Disturbance	Refers to the limit of temporary and permanent disturbance caused by the construction and operation of all components of the Project. This includes all areas to be used for project components, maintained areas and areas outside of the Project fence to be used as landscaping.
Study Area	Refers to the area evaluated for specific resource identification and/or resource impact assessment. The size of this area is appropriate for the target resource and takes into account the project setting, the significance of resource or impact being identified or evaluated, and the specific survey distances included in Title 19 of NYCRR Part 900. As appropriate, the Study Area for each type of survey or resource impact assessment is provided in the respective sections within the Application.

¹ Any references to Executive Law Section 94-c in this Application refer to former New York State Executive Law Section 94-c, now New York State Public Service Law Article VIII.

Exhibit 6: Public Health, Safety, and Security

This exhibit addresses the requirements specified in 19 New York Codes, Rules and Regulations (NYCRR) § 900-2.7.

6(a) Limitation of Adverse Impact to Public Health, Safety, and Security

As described throughout the Application, and summarized in Exhibit 2: Overview and Public Involvement Section 2(a)(2), the Shepherd's Run Solar Project (the Project) avoids, minimizes, and mitigates potential temporary and long term environmental and public safety impacts associated with construction and operation of the Project while providing substantive benefits, including local economic benefits, as described in Exhibit 18: Socioeconomic Effects, and benefits to public health through the reduction of carbon emissions. As described in Exhibit 17: Consistency with Energy Planning Objectives, the Project's solar photovoltaic technology produces no greenhouse gas emissions nor local pollutants such as NOx, SOx, and particulate matter. By replacing other generation sources whose operation produces significant pollution that harms New Yorkers, the Project promotes public health and welfare. The Project will reduce carbon and other emissions associated with energy generation, thereby minimizing the public health and environmental impacts related to climate change.

Through careful siting, the Applicant has avoided and/or minimized impacts to sensitive land uses (as described in Exhibit 3: *Location of Facilities and Surrounding Land Use*); terrestrial ecological/vegetative communities (as described in Exhibit 11: *Terrestrial Ecology*); threatened and endangered species (as described in Exhibit 12: *NYS Threatened or Endangered Species*); surface water and groundwater, aquatic resources, and wetland communities (as described in Exhibits 13: *Water Resources and Aquatic Ecology* and 14: *Wetlands*); and cultural and aesthetic resources (as described in Exhibits 8: *Visual Impacts* and 9: *Cultural Resources*). The Project has minimized potential direct and indirect impacts to onsite and adjacent land use, and through best management practices and plans, will mitigate unavoidable impacts to the maximum extent possible.

Impacts from the construction and operation of the Project will primarily occur within agricultural land, as summarized in Exhibit 2: *Overview and Public Involvement* Section 2(a)(1) and 2(a)(2) and described more thoroughly in Exhibit 15: *Agricultural Resources*. Approximately 153 acres of land are utilized for agricultural production within the Project Footprint, where both temporary and permanent disturbance are anticipated to occur. However, not all agricultural production areas within the Project Footprint will be physically disturbed, although they will be taken out of

agricultural operation during the life of the Project. At the conclusion of operation, the Project Area will be returned to its current state for future agricultural uses, as further discussed in Appendix 23-1: *Decommissioning and Site Restoration Plan* of this Application.

In terms of public health and safety, solar photovoltaic facilities are safer than most other forms of electricity generation. No temporary, long-term, nor cumulative public health impacts – including those relating to glare, noise, potable water quality, and air quality – are anticipated as a result of the Project. Solar farms do not require water or discharge wastewater; therefore, they produce energy without affecting the availability or quality of surface water or groundwater. Solar facilities are not known to pose significant health dangers to the public. In fact, the lack of impacts to air and water resources is a significant public health benefit of solar projects.

To promote safety during construction, the Applicant will communicate with the public to notify them of the beginning of Project construction. Most of the construction will occur at significant distances to sensitive receptors, and therefore noise from most phases of construction is not expected to result in impacts to sensitive receptors. Nonetheless, construction noise will be minimized through the use of best management practices. Solar facilities are quiet and produce minimal noise or vibration during operation. Noise impacts will be avoided or minimized through careful siting of Project components, as described in Exhibit 7: *Noise and Vibration* and summarized in Exhibit 2: *Overview and Public Involvement* Section 2(a)(2).

During operation, the Project will be maintained and operated safely and with minimal impacts to the surrounding areas. There is a very low likelihood that a fire would occur at the Project. The Project components have no substantive fuel source to support a fire, as the panels are comprised of primarily metal and glass, and the inverters contain no hazardous materials. Vegetation surrounding and under solar arrays will be maintained to less than three feet in height.

As detailed in Exhibit 17: *Consistency with Energy Planning Objectives* of this Application, according to New York State's (NYS or State) 2015 State Energy Plan, the 2019 Climate Leadership and Community Protection Act (CLCPA), and the 2022 Scoping Plan, reducing greenhouse gas emissions from the energy sector is a critical element of protecting the State's residents' health and welfare. Clean air is essential to public health and quality of life. The State's existing energy system is a significant contributor to impacts on the State's public health and natural resources. These impacts on public health are principally due to emissions that can influence air quality, some of which also find their way into the water and other natural resources.

Pursuant to the State Energy Plan, increasing the fraction of the State's electricity needs to be met by solar, and other renewable sources, will, in general, decrease health risks associated with electricity production. Under the CLCPA, the State is required to consume 70% of its electricity from renewable resources by 2030 and 100% of its electricity from clean (that is, including nuclear) resources by 2040. The following sections discuss, to the degree applicable to the Project, consideration of specific public health and safety risks.

(1) Anticipated Gaseous, Liquid, and Solid Wastes Produced at the Project During Construction and Operation

One of the advantages of producing electricity from solar is that it does not produce gaseous, liquid, or significant solid waste during operation.

With respect to construction, the generation of gaseous, liquid, and/or solid waste is primarily limited to standard operation of construction equipment and will be handled by the contractor in accordance with all applicable laws and regulations pertaining to such wastes. During construction, sanitary facilities used by workers will consist of on-site portable toilets, which will be emptied on an as needed basis with waste hauled to licensed off-site disposal facilities. Project construction will generate relatively minor amounts of solid waste, primarily plastic, wood, cardboard, and metal packing/packaging materials; construction scrap; and general refuse. All such materials will be collected and disposed of in on-site dumpsters. It is anticipated that there will be multiple 10 to 40-cubic yard dumpsters placed in the Project Area. A private contractor will empty the dumpsters on an as-needed basis, which is expected to be at least weekly, and dispose of the refuse at a licensed solid waste disposal facility.

Clearing of vegetation also will result in solid waste for disposal. The Project will require tree clearing (approximately 27 acres of trees), although the majority of the Project's limit of disturbance (LOD) (approximately 152.51 acres) is located within open agricultural fields. Vegetative clearing will be conducted as one of the first phases of construction activities and will be undertaken in consideration of landowner preference and coordination. Woody vegetation will be cleared from all designated areas as indicated on the final construction drawings (to be prepared for the Project following issuance of the Siting Permit). It is currently anticipated that trees cleared from designated areas within the LOD will be cut into logs and stockpiled on the edge of the work area or removed; limbs and brush may be chipped and spread over on-site upland areas (safely away from water resources) as to not interfere with existing land use practices. Alternatively, tree debris may be buried on-site if a suitable location is identified.

Subject to landowner preference, the Applicant may leave unmerchantable timber as firewood for the landowners and/or the general public, pursuant to the New York State Department of Environmental Conservation's firewood restrictions. No timber, limbs, brush, or chipped material will be spread in wetlands or stream areas.

(2) Anticipated Volumes of Waste to be Released to the Environment at the Project during Construction and Operation

The only waste to be released to the environment during construction are the logs and chipped woody vegetation that result from the tree clearing activity. Approximately 27 acres of trees are proposed to be cleared in support of Project construction. No waste will be generated or released to the environment during Project operation.

As detailed in Exhibit 11: *Terrestrial Ecology*, Section 11(a)(1), the woody vegetation occurring within the Project Area generally consists of the following:

- Mixed forest (areas dominated by trees generally greater than 5 meters tall, and greater than 20% of total vegetation cover; neither deciduous nor evergreen species are greater than 75% of total tree cover) – 1.14 acres.
- Deciduous forest (areas dominated by trees generally greater than 5 meters tall, and greater than 20% of total vegetation cover; more than 75% of the tree species shed foliage) – 152.47 acres.
- Scrub-shrub areas (habitats in early stages of succession that include shrubs and small tree saplings) – 0.89 acres.

The design drawings found in Appendix 5-1: *Civil Design Drawings* show these areas of vegetation clearing. Densely wooded areas would typically result in a volume of approximately 300 yards of wood chips per dense tree stand acre, with an additional approximately 100 yards resulting from chipping of associated stumps. Detailed stand surveys would not be done until closer to construction and will be used to refine the estimated volume and anticipated use; this general estimate is expected to be conservative. It is expected that, particularly within the mature hardwood and mixed forest areas, cleared trees would first be salvaged for use as firewood or commercial wood processing. The remaining cleared vegetation is expected to be chipped and spread on site for temporary stabilization. Although most contractors use horizontal chippers suitable for processing large stumps, if stumps remain they will be either stockpiled on-site (in non-wetland and non-agricultural areas) or disposed of at a licensed off-site landfill designated for receipt of such waste.

(3) Treatment Processes to Eliminate or Minimize Waste Released to the Environment

As discussed in Section 6(a)(2), cleared trees will be logged and stockpiled and limbs and brush will be chipped. This is the only waste that will be released to the environment during construction and operation of the Project.

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

Please refer to Sections 6(a)(1)-(3) for information regarding collection, handling, storage, transport, and disposal for waste. Procedures regarding waste collection, handling, storage, transport, and disposal of wastes also will be detailed in the Project's Construction Operations Plan and Facilities Maintenance and Management Plan, which will be filed as part of the Pre-Construction Compliance Filing (19 NYCRR § 900-10.2(e)(2) and (3)).

(5) Study Area Maps and Analysis

Figure 6-1 depicts the following location information for the area located within a 5-mile radius of the Project Area, which is based on publicly available data:

- Known public water supplies;
- Fire stations/emergency medical services stations;
- Emergency services mobile land sites;
- United States Environmental Protection Agency-regulated facilities;
- Bridges;
- Regulated dams; and
- Flood hazard areas.

As shown on Figure 6-1, with the exception of flood hazard areas, none of these features are located in the Project Area.

The Project Area contains the Taghkanic Creek and three tributaries. A 1-Percent Annual Chance Flood Zone exists within approximately 19.43 acres of the Project Footprint (associated with Taghkanic Creek), as shown in Figure 3-7, Figure 6-1, and Figure 6-2. As per the Federal Emergency Management Administration (FEMA) National Flood Map Web Service, the FEMA Q3 National Flood Layer displayed on Figure 3-7, Specially Designated Area, was derived from Flood Insurance Rate Maps (FIRMs) dated 1985. FEMA notes that the Q3 data should be "considered as an advisory tool for general hazard awareness, education, and floodplain management. The flood hazard maps displayed on the FEMA National Flood Map Web Service are not the legal document to be used when making a single site flood hazard determination" (FEMA 2020). The Town of Copake has adopted the 1985 FEMA Floodplain

map into Chapter 135 of the Town Code. According to FEMA FIRM Community Number 360174B, a portion of the Project Area contains a Flood Zone A associated with the Taghkanic Creek. To further determine areas of potential inundation during 100-year storm events, the Applicant prepared a hydrology and hydraulic study, using a two-dimensional HEC-RAS model, of an approximately 31 square mile watershed area for Taghkanic Creek. Based on this analysis, most of the Project Footprint could experience varying levels of inundation during 100-year storm events.

The Project has been designed to comply with the New York State Department of Environmental Conservation (NYSDEC) floodplain guidance to the maximum extent practicable (NYSDEC n.d). Floodplain management consists of preventative measures for reducing flood damage. The Project will be constructed in a manner that does not increase the flood elevation and protects newly constructed structures and infrastructure from flood damage. The Project has been designed in a manner that does not require fill within the floodplain and therefore will not have an impact on the existing flood elevation. Further, the stormwater management system has been designed to meet all requirements of the NYSDEC Stormwater Pollution Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity. Specifically, post-development peak runoff rates will be reduced to less than pre-development rates through the implementation of runoff reduction and detention measures and therefore will not increase the flow rates and associated floodplain of the receiving creek.

The Project's solar panels will be installed such that at full tilt, the bottom of the panel will be three feet above ground surface and above the flood elevation. All equipment that could be impacted if temporarily inundated with flood waters will be installed outside of the floodplain or above the flood elevation.

During a flood event, water will overbank and pond in the Project Area in a similar manner to existing conditions. The Project will not impede the storage of floodwater, and the fully vegetated and stabilized solar arrays will be more resistant to soil erosion than the row crop soils that flood currently. Similarly, fertilizer and pesticides typical of row crop production will be absent from the array areas, further improving water quality as compared to the existing condition. The main impact of flooding that occurs near or within the Project would be to the Project itself. To that end, the Project is designed to accommodate the occasional influx of water and ponding. Solar panels and support structures are unaffected by the occasional seasonal inundation, and the modules can be stowed flat or tracked in such a way as to

minimize the impact to energy production. Electrical equipment is rated for the conditions it operates in and located to minimize the impact to energy production.

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

As indicated in Sections 6(a)(1)-(5) above, the Project is not expected to result in any public health or safety impacts associated with gaseous, liquid, or solid wastes. Solar energy facilities do not require the use or storage of combustible fuels. As addressed in Exhibit 8: *Visual Impacts* Section 8(a)(9) and 8(d)(7), and Appendix 8-2: *Glare Analysis*, the Project is not expected to result in glare that would cause a significant impact on surrounding areas. Therefore, there are no credible public safety risks associated with the operation of the Project.

(7) Proposed Minimization Measures

As discussed above in Section 6(a)(6), the Project is not expected to negatively impact public health and safety. To minimize impacts from construction and operation of the Project on the environment, public health, and safety, the Applicant will comply with the applicable substantive local, State, and federal laws and regulations that govern Project construction and operation, except those substantive provisions of local law that the Office may determine are unreasonably burdensome (*See Exhibit 24*). Additional impact minimization measures include the commitments made by the Applicant throughout this Application process, as listed below, and compliance with the terms and conditions of any final Siting Permit, including the Uniform Standards and Conditions approved by the Office. The Project has been designed in a manner to minimize potential impacts. Additionally, as described in the Safety Response Plan (SRP) (Appendix 6-2), the Applicant will provide emergency response training to local first responders and will maintain communication with those first responders so that clear roles and responsibilities are delineated regarding emergency response. See Section 6(c) below for details.

The Office's Section 94-c regulations require public input into the environmental review of proposed major renewable energy projects so that potential adverse impacts can be identified prior to the issuance of a Siting Permit and can be avoided, minimized, or mitigated to the maximum extent practicable. The Project has been designed to avoid, minimize, and mitigate potential adverse impacts to the maximum extent practicable.

Beyond the Office's Section 94-c regulations, compliance with other applicable regulations governing the development, design, construction, and operation of the Project also will serve to minimize adverse impacts. The State Pollutant Discharge Elimination System permit, issued

by the New York State Department of Environmental Conservation, will apply to the Project. To the extent required, municipal road use agreements and New York State Department of Transportation highway permits may be acquired to minimize any safety traffic concerns and/or possible damage to roadways in the area. For a detailed analysis of impact minimization measures to a given resource, please see the respective Exhibits of this Application, including but not limited to:

- Exhibit 3: Location of Facilities and Surrounding Land Use, Section 3(s)
- Exhibit 7: Noise and Vibration, Sections 7(n) and 7(o)
- Exhibit 8: Visual Impacts, Section 8(d)
- Exhibit 11: Terrestrial Ecology, Sections 11(b), 11(c), 11(e), 11(f)
- Exhibit 13: Water Resources and Aquatic Ecology, Sections 13(a)(3), 13(b)(6), and 13(e)(2)
 - o Appendix 13-3: Stormwater Pollution Prevention Plan
 - Appendix 13-4: Spill Prevention, Control, and Countermeasure Plan
- Exhibit 14: Wetlands, Sections 14(e) and 14(f)(2)
- Exhibit 16: Effect on Transportation, Section 16(d)(4)

(8) Proposed Mitigation Measures

The Project is not expected to result in any public health or safety concerns associated with gaseous, liquid, or solid wastes. Routine inspection of the storage of these materials will be conducted to ensure compliance with best management practices. Adherence to best management practices is expected to reasonably mitigate potential unavoidable impacts. Detailed analyses of mitigation measures for impacts to resources relating to public health and safety are discussed in the following Exhibits and related Appendices:

- Exhibit 3: Location of Facilities and Surrounding Land Use, Section 3(s)
- Exhibit 7: Noise and Vibration, Sections 7(n) and 7(o)
- Exhibit 8: Visual Impacts, Section 8(d)
- Exhibit 11: Terrestrial Ecology, Sections 11(b), 11(c), 11(e), 11(f)
- Exhibit 13: Water Resources and Aquatic Ecology, Sections 13(a)(3), 13(b)(6), 13(b)(7) and 13(e)(2)

- o Appendix 13-3: Stormwater Pollution Prevention Plan
- Appendix 13-4: Spill Prevention, Control, and Countermeasure Plan
- Exhibit 14: Wetlands, Sections 14(g)
- Exhibit 16: Effect on Transportation, Section 16(d)(4)

In addition, as previously mentioned, the Applicant will implement a complaint resolution protocol prior to construction (in accordance with 19 NYCRR § 900-10.2(e)(5) and (7)) which will consist of the following:

- The communications protocol and contacts for construction and operation;
- How to register a complaint;
- The process for gathering and analyzing information regarding the complaint;
- Complaint response and tracking;
- Complaint response follow-up; and
- Reporting to New York State Department of Public Service and ORES of the status of a complaint after follow-up.

(9) Proposed Impact Monitoring

The Applicant is committed to developing and operating the Project in a safe and environmentally responsible manner. In addition to the impact minimization and mitigation measures described/referenced above, an Environmental Compliance and Monitoring Program (ECMP) will be implemented during Project construction, which will designate an Environmental Compliance Manager (ECM)/Environmental Monitor (EM). The ECM/EM will generally oversee compliance with all environmental commitments and permit requirements during construction. The ECMP will be filed with ORES, as appropriate, as part of the required compliance filings.

The ECMP will include the following components with respect to public health and safety:

 <u>Planning</u> – Prior to the start of construction, the ECM/EM will review the Siting Permit and any other environmental permits and based upon the conditions/requirements of the permits, prepare an environmental management document (Environmental Compliance Manual) to be utilized for the duration of the construction and operation of the Project. This document will clearly identify all environmental requirements for construction and operation included in the Project's Siting Permit and any other permits and approvals and will be designed to aid in the management of environmental issues or concerns that may arise. The Environmental Compliance Manual will include: 1) copies of the Siting Permit, including Uniform Standards and Conditions, and any other issued environmental permits and approvals; 2) a compliance matrix that summarizes all relevant Siting Permit and any other permit requirements and identifies the responsible party and time frame (if applicable); and 3) a Project contact list and organizational chart.

- <u>Training</u> The ECM/EM will hold environmental training sessions that will be mandatory for all contractors and subcontractors before they begin working within the Project Area. The purpose of the training sessions will be to distribute the Environmental Compliance Manual; explain the ECMP in detail, prior to the start of on-site work; and to assure that all personnel on site are aware of the permitting requirements for construction of the Project.
- 3. <u>Pre-Construction Coordination</u> Prior to construction, the contractor(s), the ECM/EM and applicable State agency staff will conduct a meeting and walkover of areas to be affected by construction activities. The limits of work areas, especially in and adjacent to sensitive resource areas such as wetlands and forest land, will be defined by flagging, staking, or fencing, as needed. This walkover will identify sensitive resources, limits of clearing, proposed stream or wetland crossings, and placement of sediment and erosion control features. Specific construction procedures will be discussed and updated to become part of the Project layout and construction sequence, as needed. This pre-construction site review will serve as a critical means of identifying any required changes in the construction has begun. Proposed changes to the construction plan will be identified as soon as possible, as changes may require an agency notification period and take time for approval to be received.
- 4. <u>Construction and Restoration Inspection</u> The monitoring program will include daily inspection of construction work sites by the ECM/EM. The ECM/EM is the primary individual responsible, on behalf of the Applicant, for overseeing and documenting Project compliance with environmental permit conditions. The ECM/EM will conduct inspections of all areas requiring environmental compliance, with an emphasis on those activities that are occurring within jurisdictional/sensitive areas, including cultural resource areas, wetland and stream crossings, forested areas, and active agricultural lands. When on-site, the ECM/EM's schedule will include participation in a daily Plan of Day meeting with the contractors to obtain schedule updates, identify in-field monitoring priorities, and address any observed or anticipated compliance issues. During each visit, multiple operations are likely to be occurring throughout the Project Area that will be monitored by the ECM/EM.

Activities with the potential to impact jurisdictional/sensitive resources, or with greater potential for environmental impact, will receive priority attention from the ECM/EM. The ECM/EM will keep a log of daily construction activities and will issue periodic/regular (typically weekly) reporting and compliance audits. Additionally, when construction is nearing completion in certain portions of the Project Area, the ECM/EM will work with the contractors to create a punch list of areas in need of restoration to be performed in accordance with all issued permits.

Once construction is complete, the Environmental Compliance Manual will be revised to eliminate construction-only obligations, and remaining obligations will be integrated into the Operations and Maintenance (O&M) Plan. In addition to environmental inspections and/or monitoring that may be required, standard inspections will include examination of solar panels for wear and tear, or any other issues.

6(b) Preliminary Plan for Site Security during Operation of the Project

The Operations Site Security Plan (Operations SSP) for the Project is provided as Appendix 6-1 to this Application. The Operations SSP describes the proposed security measures and procedures to be employed during Project operation. Specifically, the Operations SSP describes the administrative and physical site security measures, access controls, electronic and surveillance features, security lighting, and setback considerations to minimize hazards to the public. Final construction drawings, including details of the perimeter fencing and gating, electronic security and surveillance facilities, lighting, and other required features specified in 19 NYCRR § 900-2.7(b) will be appended to the Operations SSP and filed as part of the Pre-Construction Compliance Filing (19 NYCRR § 900-10.2).

(1) Access Controls

Access controls during Project O&M are presented in the Operations SSP. During operation, the Project will typically be un-manned except for O&M activities, and the Project will be remotely monitored and controlled. The Applicant will evaluate third-party options to monitor and control the Project from a remote-controlled center. O&M staff will conduct regular site inspections and periodic maintenance. All equipment and solar arrays will be within permanently fenced areas. In total, eight main gated entrances will be established for the Project. Portions of the Project, particularly where panels and inverters are located, will be fenced, not open to the public, and restricted to Project staff, vendors, suppliers, and other authorized personnel. Refer to Section 3.0 of Appendix 6-1 for additional detail.

(2) Electronic Security and Surveillance Facilities

Electronic security and surveillance are not proposed for the Project. O&M staff will periodically evaluate security conditions and consider additional security measures, such as video surveillance or motion detection cameras, in order to monitor activity in key equipment storage areas and security risk areas.

Relatively little material will be stored onsite during Project operation. In case valuable materials are stored onsite, the Project operator(s) may consider additional security features (entry alarms, cameras, etc.) to secure such stored material.

Refer to Section 3.0 of Appendix 6-1 for additional detail.

(3) Security Lighting

During normal operations, most of the Project will not be lit during nighttime hours. There may be street lights or manually-operated security lighting installed at the main entrances to the Project, as mentioned in Exhibit 8: *Visual Impacts*, Section 8(a)(5): *Lighting* and Section 8(d)(9): *Lighting Plan*. Within the onsite substation, manually-operated lighting will be provided in compliance with the National Electrical Safety Code. It will not be activated except during nighttime O&M activities. Photo-cell activated lighting may be included above the entrances to the substation control buildings for safety purposes. Lighting near the perimeter and off-site receptors will be directed downward and toward the interior of the Project to the maximum extent practicable in order to minimize off-site light impacts. If warranted, photo-cell activated lights and infrared security cameras may be installed at storage areas and key perimeter risk areas.

Onsite O&M work activities will generally be limited to daylight hours. In the rare cases when nighttime O&M work is required, work lights will be limited to only those small work areas and will be directed downward and away from offsite receptors, where possible. Temporary work area lighting will be shut down at night, unless required for security purposes.

Refer to Section 3.0 of Appendix 6-1 for additional detail. Specifications for lighting are presented in Exhibit 8: *Visual Impacts*, Section 8(a)(5): *Lighting* and Section 8(d)(9): *Lighting Plan*.

(4) Lighting of Project Components to Ensure Aircraft Safety

Components greater than 200 feet in height are not proposed for the Project; therefore, aircraft obstruction lighting is not applicable. The Project will not compromise aircraft safety. Refer to Section 3.5 of Appendix 6-1 for additional detail.

(5) Cyber Security Program

Project O&M will comply with applicable North American Electric Reliability Corporation reliability standards. The Operations SPP, included as Appendix 6-1, describes the measures planned to ensure the required cyber security program for the protection of digital computers, communication systems, and networks associated with the Project. Periodic validation of compliance with the applicable standards by an independent auditor will be carried out as required by 19 NYCRR § 900-2.7(b)(5). Refer to Section 4.0 of Appendix 6-1 for additional detail.

6(c) Safety Response Plan

The Safety Response Plan (SRP), provided as Appendix 6-2, provides information to Project personnel and first responders regarding potential emergency action(s) to be taken within the Project Area. The SRP was developed to support Project safety personnel in the event of a major emergency occurring where work is performed. The SRP identifies local first responders and utility owners/operators with utility infrastructure located within the Project Area, to act as a quick reference guide for responding during an emergency.

The SRP focuses on both Project construction and operation. The SRP lists onsite equipment and systems planned for use during Project construction to aid in the prevention of, and response to, fire and hazardous substance-related incidents. In accordance with 19 NYCRR § 900-2.7(c)(1) – (7) the SRP includes detailed information regarding the following:

- Contingencies that would constitute a safety or security emergency;
- Emergency response measures by contingency;
- Evacuation control measures by contingency, including public evacuation if necessary;
- Community notification procedures by contingency;
- On-site equipment and systems to prevent or handle fire emergencies and hazardous substance incidents, in accordance with the New York State Uniform Fire Prevention and Building Code;
- Contingency plans to be implemented in response to the occurrence of a fire emergency, hazardous substance, or gas pipeline incident; and
- Annual local emergency response organization training.

Key components of the SRP are described in Sections 6(b)(1) through 6(b)(7) below.

(1) Emergency Contingencies

Contingencies that would constitute a safety or security emergency are described in the SRP. As described in Section 3.1 of the SRP, the occurrence of the following conditions would constitute a safety or security emergency at the Project:

- Report of a fire within or adjacent to the Project;
- Medical emergency within the Project;
- Report of pending high-winds, lightning, or a severe storm that may pose a risk to workers and/or the Project;
- Report of a gas pipeline break or a transmission line break near or within the Project;
- Report of a spillage of hazardous substances adjacent to or within the Project; and
- An event or combination of events that, in the opinion of the Site Manager, is deemed to be a potential or significant hazard to personnel or public safety.

Upon the occurrence of any such event, the Site Manager will assess the degree and oversee the appropriate response, which may include declaring a Project Emergency Condition. Refer to Sections 7, 9, 10, 11, 12, and 13 of SRP in Appendix 6-2 for a description of these emergency contingencies.

(2) Emergency Response Measures by Contingency

Emergency response measures for each contingency are described in the SRP. In general, as described in Section 6.2 of the SRP, if an emergency is occurring that poses an immediate threat to the health or safety of on-site personnel or the surrounding community, Project personnel will immediately contact the appropriate On-site Crew Leader, the site ECM/EM, or Site Manager. Any of these Project representatives may contact 911 if appropriate. The Site Manager will generally be responsible for assessing, overseeing, and coordinating emergency response. For emergency response procedures specific to each contingency, please refer to Sections 7, 9, 10, 11, 12, and 13 of the SRP in Appendix 6-2.

(3) Evacuation Control Measures by Contingency

Evacuation control measures for each contingency are described in the SRP. In general, during an evacuation of the Project, the following procedures will be followed, as described in Section 8 of the SRP:

- Evacuation will occur upon direction by the Site Manager. Notification will be made via two-way radio or cell phone;
- Personnel will be aware of all site exit points and muster locations;
- When instructed to evacuate, personnel will do so quickly to the nearest muster location;
- All personnel should meet at the designated muster points;
- If it is safe, personnel will remain in this location until roll call has been taken. Personnel will not leave premises until accounted for and given permission to do so. Valuable time could be wasted searching for personnel who have not followed correct procedures;
- Fire lanes and walkways will be kept clear for emergency crews and equipment;
- During emergency situations, only authorized personnel will be allowed within the Project to perform such responsibilities as shutting down power, potentially hazardous equipment, heat sources, gases, machines and other electrical equipment; and
- Personnel will be trained on what to do should they become trapped in any location, including:
 - Staying calm and using a cell phone to call the team leader or Site Manager; and
 - Standing by and waiting for help.

Project equipment and systems do not present a hazard to the neighboring community, and therefore, community evacuation would not be required.

For evacuation procedures specific to each contingency, please refer to Sections 7, 9, 10, 11, 12, and 13 of the SRP in Appendix 6-2.

(4) Community Notification Procedures by Contingency

Community notification procedures for each contingency are described in the SRP. In general, as described in Section 6.2 of the SRP, the Site Manager will contact the appropriate First Responder(s) who will manage any necessary community notices as deemed required. For community notification procedures specific to each contingency, please refer to Sections 7, 9, 10, 11, 12, and 13 of the SRP in Appendix 6-2.

(5) On-site Equipment and Systems for Fire or Hazardous Substance Emergencies

Equipment and systems will be installed or available throughout the Project to prevent and mitigate fire and chemical emergencies in accordance with the New York State Uniform Fire Prevention and Building Code. As described in the SRP, the following equipment will be available on-site:

- First Aid Kit / CPR Kit
- Automatic External Defibrillator (AED)
- Oil Spill Kit
- Chemical Spill Kit
- Fire Extinguishers
- Fire suppression system (if required by code)
- Portable loud speaker and/or audible signal alarm

For additional information regarding on-site emergency equipment and systems, please refer to Section 5 and Appendix B of the SRP in Appendix 6-2.

(6) Contingency Plans for Fire or Hazardous Substance Emergencies

Based the design of the Project, the potential for fires or hazardous substance emergencies is considered to be low. However, out of an abundance of caution, contingency plans have been developed for implementation during a fire emergency or hazardous substance incident. For specific information detailing fire and hazardous substance contingency plans, please refer to Section 9 and 11 of the SRP in Appendix 6-2. Hazardous substances will also be addressed in the Project's Spill Prevention, Control, and Countermeasure Plan (Exhibit 13, Appendix 13-4).

(7) Training Drills

All on-site Project Personnel will be trained to understand the requirements and procedures outlined in the SRP. Additionally, training drills with First Responders will be conducted at least once per year in accordance with NYCRR § 900-2.7(c)(7). During these training drills, the Applicant will solicit and consider local emergency responder feedback and will update the SRP as appropriate based on such input. Refer to Section 2.0 of the SRP in Appendix 6-2 for additional information.

6(d) Review by New York State Division of Homeland Security and Emergency Services

The Applicant provided a copy of the plans discussed in Section 6(b) and 6(c) of this Exhibit, the Operations SSP and SRP, respectively, to the New York State Division of Homeland Security and Emergency Services on January 31, 2022 and again on May 24, 2024 and has requested that they review the plans and provide comments.

6(e) Plans Provided to Local Office of Emergency Management for Cities with a Population Over One Million

The Project will not be located within any part of a city with a population over one million (1,000,000). Therefore, this requirement is not applicable to the Project.

References

New York State Department of Environmental Conservation (NYSDEC). (n.d.) Floodplain Management. Retrieved May 3, 2024 from, https://dec.ny.gov/environmentalprotection/water/water-quantity/dam-safety-coastal-flood-protection/floodplainmanagement.