



**Exhibit 6: Public Health,
Safety and Security**

Cider Solar Farm
Towns of Oakfield and Elba
Genesee County, New York

Matter No. 21-1108

EXHIBIT 6: PUBLIC HEALTH, SAFETY AND SECURITY

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Abbreviations

CLCPA	Climate Leadership and Community Protection Act
EMP	Environmental Monitoring Program
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
HSE Manager	Health, Safety, and Environmental Manager
NYCRR	New York Codes, Rules, and Regulations
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
O&M	operations and maintenance
SPCC Plan	Spill Prevention, Control, and Countermeasure (Plan)
SRP	Safety Response Plan
SSP	Site Security Plan
SWPPP	Stormwater Pollution Prevention Plan
USACE	United States Army Corps of Engineers

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Glossary of Terms

Applicant	Hecate Energy Cider Solar LLC
Project	Refers to the proposed Cider Solar Farm, an up to 500-megawatt utility scale solar project that will be comprised of photovoltaic panels, inverters, access driveways, electrical collection lines, point of interconnection/substation, construction staging areas, fencing and plantings, located on private land in the towns of Elba and Oakfield, Genesee County, New York.
Project Area	Refers to the Project Site and surrounding/adjacent land totaling approximately 7,518 acres.
Project Footprint	Refers to the limit of temporary and permanent disturbance within the Project Site caused by the construction and operation of all components of the Project totaling approximately 2,452 acres.
Project Site	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 totaling approximately 4,650 acres.
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 Chapter XVIII, 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.

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The content of Exhibit 6 is provided in conformance with Chapter XVIII, Title 19 of the New York Codes, Rules, and Regulations (NYCRR) § 900-2.7, as follows.

a) Impacts on the Environment, Public Health, and Safety

Solar photovoltaic facilities are safer than most other forms of electricity generation. Unlike fossil-fuel-fired power plants, solar farms produce energy without emitting pollutants that affect air quality. In addition, 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.

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 and the 2019 Climate Leadership and Community Protection Act (CLCPA), 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 consuming 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 Cider Solar Farm (Project), consideration of specific public health and safety risks.

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

During operation, electricity produced from the Project will not produce gaseous, liquid, or significant solid waste. During construction, the generation of gaseous, liquid, or solid waste is primarily limited to the standard operation of construction equipment and general construction activities. Gaseous and liquid waste will include the operation of construction equipment that will be managed by the designated contractor. Construction equipment and vehicles will be fueled by unleaded gasoline and ultra-low sulfur diesel and will have maintained mufflers. Solid and sanitary wastes will be handled by a private contractor qualified to handle the types of wastes generated in accordance with all applicable laws and regulations pertaining to such wastes. During construction, workers' sanitary facilities 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, metal packing or packaging materials, construction scrap, and general refuse. All such materials will be collected and disposed of in on-site 10 to 40 yard roll off dumpsters located within the Project Footprint at locations such as laydown yards. A private contractor will empty the dumpsters on an

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as-needed basis, which is expected to be at least weekly, and dispose of the refuse at a licensed solid waste disposal facility.

Vegetation clearing also will result in solid waste for disposal. Subject to landowner preference, the Applicant may coordinate with logging contractors to provide unmerchantable timber as firewood to the landowners or the general public, according to the New York State Department of Environmental Conservation's (NYSDEC) firewood restrictions. The Project will require limited vegetation and tree clearing (approximately 203.1 acres of successional forestland, 12.2 acres of successional shrubland and 0.2 acres of forested wetlands). Active agricultural land represents 88% of the Project Footprint (2,158.6 acres). Vegetative clearing will be conducted as one of the first phases of construction activities and will be undertaken with consideration of landowner preference and coordination. Tree habitat that represents a potential habitat for tree-roosting bats and migratory birds will be cleared during the winter months (November 1 through April 1), to the extent feasible, to avoid impacts to these wildlife species. Woody vegetation will be cleared from all designated areas as indicated on the final construction drawings. It is currently anticipated that trees cleared from designated areas within the limit of disturbance 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 within the Project Footprint outside of wetlands, streams, and active agricultural areas.

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

No other wastes are anticipated beyond those described above. The only calculable waste to be released to the environment during construction are the stumps, logs and chipped woody vegetation that results from the anticipated tree clearing activity. A de minimis amount of water may be used for vehicle washing associated with the invasive species control (removal from trucks), as described in Exhibit 13: *Water Resources and Aquatic Ecology* and Appendix 13-E: *Cider Solar Farm Invasive Species Survey Baseline Report* of this Application (Cider Solar Farm Invasive Species Survey Baseline Report). With the exception of general construction waste, no other waste will be generated nor released to the environment during Project operation.

Woody vegetation occurring within the limit of temporary and permanent disturbance caused by the construction and operation of all components of the proposed Project (Project Footprint) generally consists of the following:

- Successional forestland – 203.1 acres
- Successional shrubland – 12.2 acres
- Forested wetlands – 0.2 acres

Figure 3-1: *Proposed Project* in Exhibit 3: *Location of Facilities and Surrounding Land Use* of this Application illustrates the locations of these proposed areas of vegetation clearing. Generally, densely wooded areas 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 will be done closer to construction and will be used to refine the estimated volume and

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anticipated use; this general estimate is expected to be conservative. It is expected that cleared trees would first be salvaged for use as firewood or commercial wood processing, particularly within the mature hardwood and mixed forest areas. 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.

As described in the Invasive Species Control Plan (Attachment B of Appendix 13-E: *Cider Solar Farm Invasive Species Survey Baseline Report* of the Application), the use of herbicides may be required for selective targeting of invasive species but would not be used on a broad scale across the Project Site. Herbicide treatments would be applied by a Certified Commercial Pesticide Applicator, Commercial Pesticide Technician, or a Private Pesticide Applicator (i.e., individuals that meet the requirements set forth in 6 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 and the particular invasive species to be controlled. Any species used for biological control will be obtained from approved sources and released pursuant to specifications.

3) Treatment Processes to Minimize Wastes Released to the Environment

No waste treatment is anticipated as a part of Project construction nor operation, as none is necessary. As discussed in Exhibit 11: *Terrestrial Ecology* of the Application, cleared trees will be logged and stockpiled, and limbs and brush will be chipped. Apart from typical construction-related waste, this is the only anticipated waste that will be released into the environment during the construction and operation of the Project.

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

Refer to Sections (a)(1) through (a)(3) of this Exhibit for additional detail regarding the manner of collection, handling, storage, transport, and disposal for wastes retained and not released at the site, or to be disposed of. Exhibit 23: *Site Restoration and Decommissioning* contains a Decommissioning and Site Restoration Plan (Appendix 23-A), which describes methods for recycling of equipment and materials at the end of usable life of the Project. 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 (e)(3)).

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5) Public Health and Safety Map

Figure 6-1: *Public Health, Safety and Security* depicts the following location information for the area located within a 2-mile radius of the Project Area (Study Area for analyzing impacts to public health, safety, and security), which is based on publicly available data:

- Public water supply resources;
- Community emergency response resources and facilities including police, fire and emergency medical response facilities and plans;
- FEMA flood hazard zones;
- Dams, bridges and related infrastructure;
- Natural gas facilities;
- Electrical transmission lines;
- Explosive or flammable materials transportation or storage facilities; and
- NYSDEC remediation sites.

As shown on Figure 6-1, there are no NYSDEC designated remediation sites directly within the proposed Project Site. Additional information on remediation sites in the Project Area is included in Exhibit 3 and Appendix 3-D: *Phase I Environmental Site Assessment* of this Application. There are a number of dams, bridges, and related infrastructure within the Study Area, as well as petroleum bulk storage, United States Environmental Protection Agency facilities, and one public water supply. The Empire Gas Pipeline and two New York Power Authority-owned transmission lines cross through the Project Site, in an east-west direction, as show on Figure 6-1. Potential impacts to each of these sites within the Project Site have been evaluated and avoided to the maximum extent practicable, through Project design. The following were not identified within 2-mile Study Area: Hospitals and emergency medical facilities; emergency communications facilities; existing known hazard risks including storm surge zones, areas of coastal erosion hazard, landslide hazard areas, areas of geologic, geomorphic or hydrologic hazard.

As per the FEMA National Flood Map Web Service, the FEMA Q3 National Flood Layer displayed on Figure 6-1 was derived from Flood Insurance Rate Maps (FIRMs) dated 1981 through 1984. FEMA notes that the Q3 data 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). Genesee County, in coordination with FEMA, is undergoing an effort to develop a DFIRM Database (digital data) as well as update the FIRMs countywide. However, these data will not be made available until 2022.

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

No significant adverse impacts to public health and safety are anticipated to result from construction or operation of the Project.

As indicated in Section (a)(1) of this Exhibit, the Project is not expected to result in any public health or safety concerns associated with gaseous, liquid, or solid wastes. Solar energy facilities do not require the use or storage of combustible fuels.

No temporary, long-term or cumulative public health impacts on local receptors are anticipated. These typically include issues relating to glare, noise, air and potable water. As addressed in Exhibit 8: *Visual Impacts* of this Application, the Project is not expected to result in glare that would cause a significant effect on surrounding areas. A glare analysis was conducted for the Project and is provided as Appendix 8-B: *Glare Hazard Assessment* of this Application. However, Project construction has the potential to generate temporary impacts related to noise at adjacent properties. Temporary noise impacts from construction are anticipated to be typical of large construction sites, but within acceptable regulatory guidelines for temporary noise generation, and will not impact the public health or safety. For more detail, please refer to Exhibit 7: *Noise and Vibration* and Exhibit 8 of this Application.

Solar energy facilities generate emission-free electricity. Electrons produced by the Project would offset electrons from conventional fossil-fuel burning power plants in the area, improving the air quality within the region and, likewise, public health. Temporary impacts to air quality as a result from construction activities (i.e., emissions from construction equipment and transport vehicles) are expected to be negligible.

Unlike conventional plants, operating solar facilities use little to no water and have a relatively low impact design. Certain Project construction activities have potential to result in direct and/or indirect impacts to surface waters. These activities include the installation of access roads, upgrading of existing farm lanes, installation of buried electrical collection lines.

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 less than 3 feet in height. In the event a piece of equipment catches fire, the lack of fuel in the solar field prevents the fire from spreading.

Regarding the potential for introduction of hazardous materials into the soil, the proposed solar panels are a solid material and do not contain liquids. They consist of glass and metal materials that can be recycled at the end of their useful life. Accordingly, there is no potential for introduction of hazardous materials into the soil associated with the Project.

As discussed in Exhibit 16: *Transportation Resources* of this Application, during Project construction, the increased truck traffic from workers, construction vehicles, and delivery vehicles might present an additional collision risk on nearby roadways. Daily, construction workers are anticipated to represent between 225 and 315 round trips. Construction workers will likely arrive by 7:00 AM and leave around 7:00 PM, although departure times may vary seasonally, depending on daylight hours. This timing for

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worker departures should prevent the peak of construction worker traffic to avoid impacting typical peak rush hour traffic on nearby roadways. To minimize the risk of accidents, the Applicant will require contractors to drive at safe speeds and install a warning sign for oncoming traffic at the entrance to the Project Site off NY Route 98 and Lockport Road.

7) Impact Minimization Measures

The Applicant has proposed measures to minimize direct and indirect impacts to public health, safety, and security as a result of the Project, as described in Section (d)(6) of this Exhibit. Waste generated from the construction and operation of the Project will have no significant adverse impact on the environment, public health, or safety; still, compliance with applicable local, state, and federal regulations and commitments made by the Applicant pursuant to any permit issued by the Office of Renewable Energy Siting, and the requirements of 19 NYCRR Part 900 and Subpart 900-6 Uniform Standards and Conditions, will minimize impacts from construction and operation of the Project generally.

Solar panel components are not composed of flammable nor radioactive materials. While extremely unlikely, the primary source of a potential fire could occur at the substation connection of wires by inverters and transformers. Measures to minimize fire risk as well as emergency response training requirements are detailed in the Applicant's SRP (Appendix 6-B: *Safety Response Plan*). Hecate Energy Cider Solar LLC will be providing emergency response training to the local fire departments to respond in the unlikely event of a fire. These trainings also are anticipated to assist in fire department response to individual home solar panels within the community.

Under 19 NYCRR Part 900, public input into the environmental review of proposed projects is required to identify potential adverse impacts prior to implementation and avoid, minimize, or mitigate those impacts to the maximum extent practicable. The Project has been designed, in accordance with industry standards, to avoid, minimize, and mitigate potential adverse impacts to the maximum extent practicable. Impact minimization measures paired with proposed Project setbacks from residences, as detailed in Exhibit 5: *Design Drawings* of this Application, will provide minimization of risk to public health and safety associated with temporary construction and long-term operational impacts. Project components will be fenced and located on private land, which will limit public access. Although glare from solar panels is not anticipated to impact residences nor drivers of vehicles on adjacent roadways in the Project Area, as described in Appendix 8-B, proposed Project setbacks will further minimize any potential impact associated with glare.

Compliance with other regulations governing the development, design, construction, and operation of the Project will also serve to minimize potential adverse impacts related to water and water quality. Federal permitting required by the United States Army Corps of Engineers (USACE) will serve to protect federally regulated wetlands and other navigable waters of the United States under USACE jurisdiction. Refer to Exhibit 13 and Exhibit 14: *Wetlands*, respectively, for a discussion of water and wetland resources on site and associated minimization measures. The State Pollutant Discharge Elimination System permit, issued by the NYSDEC, is undertaken separately from the 94-c Application process. See Appendix 13-C: *Stormwater Pollution Prevention Plan* of this Application. Impacts related to the construction of access road and collection line crossings will be minimized to the maximum extent practicable by utilizing existing crossings and by crossing at narrow wetland and waterbody locations where feasible. In addition,

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implementation of the BMPs in the Spill Prevention, Control, and Countermeasure (SPCC) Plan and Stormwater Pollution Prevention Plan (SWPPP) will avoid or minimize impacts to the maximum extent practicable. Project components have been sited to avoid temporary or permanent impacts to waterbodies to the maximum extent practicable. Additional detail regarding impacts to surface waters and other water resources is included in Exhibit 13.

To the extent required, municipal road use agreements and New York State Department of Transportation highway permitting could be acquired to minimize any safety traffic concerns and possible damage to roadways in the area. To minimize the risk of accidents, the Applicant will require contractors to drive at safe speeds and install a warning sign for oncoming traffic at entrances to the Project Site. Impacts and minimization measures are further described in Exhibit 16. For more information on minimizing potential adverse impacts to traffic conditions, refer to Exhibit 16.

8) 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. These inspections are expected to mitigate potential unavoidable impacts. Detailed analyses of mitigation measures for impacts to resources relating to public health and safety, as detailed in Section (d)(7) of this Exhibit, are discussed in detail in the following exhibits and related appendices:

- Exhibit 3: *Location of Facilities and Surrounding Land Use*
- Exhibit 7: *Noise and Vibration*
- Exhibit 8: *Visual Impacts*
- Exhibit 11: *Terrestrial Ecology*
- Exhibit 13: *Water Resources and Aquatic Ecology*
 - Appendix 13-C: *Stormwater Pollution Prevention Plan*
 - Appendix 13-D: *Spill Prevention, Control, and Countermeasure Plan*
- Exhibit 14: *Wetlands*
- Exhibit 16: *Transportation Resources*

The Applicant will implement a Facilities Communications Plan and a Complaint Management Plan (provided as part of the Pre-Construction Compliance Filings (19 NYCRR §§ 900-10.2(e)(5) and (e)(7), respectively), which will consist of the following:

- The communications protocol and contacts for construction and operation;
- How to register a complaint;
- Notification to the public of complaint procedures;
- The process for gathering and analyzing information regarding the complaint;
- Complaint response and tracking procedures;

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- Complaint response follow-up procedures; and
- Reporting to State Department of Public Services of the status of a complaint after follow-up.

9) Proposed Monitoring

The Applicant is committed to developing and operating the Project in a safe and environmentally responsible manner. In addition to the mitigation measures described above, an Environmental Monitoring Program (EMP) will be implemented during Project construction, and the Applicant will assign a Health, Safety, and Environmental Manager (HSE Manager) to act as the Project's Environmental Monitor. The HSE Manager will generally oversee compliance with all environmental commitments and permit requirements during construction. The EMP will be filed as part of the Pre-Construction Compliance Filing (19 NYCRR § 900-10.2(e)(6)).

Once construction is complete, the EMP will be revised to eliminate construction-only obligations, and remaining obligations will be integrated into the Project's Construction Operations Plan (Compliance Filing per 19 NYCRR § 900-10.2(e)(2)). In addition to environmental inspections and/or monitoring that may be required, standard inspections will examine solar panels for wear and tear, or any other issues. Details regarding the inspection protocol and schedule are provided in the Project's Facility Maintenance and Management Plan (Compliance Filing per 19 NYCRR § 900-10.2(e)(3)).

b) Plan for Site Security During Operation

Project safety and security during operations is a priority to the Applicant and this commitment includes creating and maintaining a safe working environment and developing secure and safe project facilities. The Applicant has developed an Operations Site Security Plan (SSP), provided as Appendix 6-A, the contents of which are summarized in the following section of this Exhibit.

1) Access Controls

The Project will include security controls designed to prevent access from the general public. These access controls, consisting primarily of gating, fencing, signage and site escort requirements, are described in the Operations SSP (Appendix 6-A). During operation, the Project will typically be un-staffed except for O&M activities, and the Project will be remotely monitored and controlled. O&M staff will conduct regular site inspections and periodic maintenance. All equipment and photovoltaic solar arrays will be within permanently fenced areas. In total, 31 main gated entrances from main public roads will be established for the Project. Portions of the Project, particularly where panels and inverters are located within the Project Footprint, will be fenced and not open to the public and restricted to Project staff, vendors, suppliers, and other authorized personnel.

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, to monitor activity in key storage areas and security risk areas.

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3) Security Lighting

Proposed lighting associated with the Project includes manually activated emergency and security service lighting located at the on-site collection substation. The service lighting will only be activated in the event of an outage or other repair-related event at the substation during nighttime hours. Within the substation a total of approximately four service lights will be installed. The lighting will be mounted at a height of 30 feet all major equipment such as circuit breakers, transformers, disconnect switches (two lights will be mounted on the structures near such equipment) and will be directed downward toward equipment. In these locations, Lithonia HLF1 fixtures with a lumen output of 30,646 (or similar) will be used. The service lights will only be turned on when Project personnel are performing maintenance; lights will be turned off after repairs are completed. Security lights will also be installed above the door of the control building at the substation, manually switched on at night. At the control building, RAB Slim26 fixtures (or similar) with a lumen output of 3,536 will be used. The security lights on the control building will be activated during nighttime hours. Security lighting at the control building will be directed downward and shielded to avoid light trespass and nighttime light pollution impacts. Manually activated security lighting will also be located on 30-foot poles at the entrance gate to the on-site substation (along Graham Road). No nighttime lighting is proposed in the solar array fields. The amount and character of light generated by the Project proposed security lighting will be consistent with other industrial and commercial facilities that may employ similar lighting within the Study Area, including some commercial agricultural facilities and uses within the villages of Elba and Oakfield.

4) Aircraft Safety Lighting

Lighting for aircraft safety is not required for the Project pursuant to Federal Aviation Administration (FAA) regulations. As the Project does not involve components greater than 200 feet in height, the Project will not compromise aircraft safety (FAA 2015). The Genesee County Airport is located approximately 2 miles south of the Project Area. The Pine Hill Airport is located approximately 3 miles north of the Project Area. The Zelzany Airport is located approximately 4 miles to the northwest of the Project Area. Solar glare exposure to these airports will be avoided or minimized in accordance with the Visual Impacts Minimization and Mitigation Plan included in Exhibit 8. The Project will not create glare exposure that will impede air traffic movements, result in complaints, or create safety hazards.

5) Cyber Security Program

Project O&M will comply with applicable North American Electric Reliability Corporation reliability standards. The Operations SSP (Appendix 6-A), describes the measures planned to ensure the required cyber security. Periodic validation of compliance by an independent auditor will be carried out as required by 19 NYCRR § 900-2.7(b)(5).

c) Safety Response Plan

The following section summarizes procedures outlined in the Project's Safety Response Plan (SRP; Appendix 6-B) to ensure the safety and security of the local community. Emergency response contacts are included in Attachment C of the SRP (Appendix 6-B).

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1) Identification of Contingencies

The SRP (Appendix 6-B) provides information to Project personnel and other emergency response agencies regarding actions that may be required during an emergency within the Project Site. The SRP discusses events that may constitute a safety or security emergency, including:

- Medical emergency;
- Transmission line or gas pipeline break;
- Fire;
- Severe adverse weather;
- Hazardous material spill; and
- Crime / violent behavior / civil disturbance.

2) Emergency Response Measures

Upon Site Manager confirmation and assessment of the severity of the following conditions, a Project Emergency Condition could be declared:

- Report of a fire within or adjacent to the Project;
- Medical emergency within the Project Site;
- Report of a pending high-winds, lightning, or severe storm that may pose risk to workers and/or the Project;
- Report of gas pipeline break or transmission line break near or within the Project;
- Report of a spillage of hazardous substances adjacent to or within the Project; and
- 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 receiving any one or a combination of the above reports, the first stage before proceeding with escalation is to assess the severity and urgency of the report and to identify the potential impact, collecting relevant facts and corroborating sources as soon as possible. If deemed credible, the response shall be acted on in accordance with the SRP and proper judgment of the Project management.

Damage to property caused by one or more of the above events with the potential for escalation into other events that could directly or indirectly lead to potential injury or loss of life should be quickly assessed and acted on by the Site Manager. Project management should take relevant actions to remediate the potential consequences or escalation of the event at the Project as soon as possible.

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3) Evacuation Control Measures

Due to the nature of the technology employed, the Project equipment and systems do not present a hazard to the neighboring community and thus, community evacuation procedures are not required. During construction there may be multiple crews working on site, and specific conditions (e.g., high wind, lightning) may require site evacuation, as described in detail in Appendix 6-B. Evacuation procedures will occur upon direction by the Site Manager and notifications made via two-way radio or cell phone.

4) Community Notification Procedures

If an emergency is occurring that poses an immediate threat to the health and safety of personnel or the surrounding community, Project personnel will immediately contact the team leader, the Site Health, Safety, and Environmental Manager or Site Construction Manager. Any of the Project management team or team leader may contact 911 if deemed necessary. The Site Construction manager will contact the first responder (contact details in Appendix 6-B), which will manage any necessary community notices as deemed required.

5) Fire Emergency and Hazardous Substance Equipment

As listed in the SRP (Appendix 6-B), the following fire emergency and hazardous substance equipment will be on site:

- First aid kit/CPR kit
- Automatic external defibrillator
- Oil spill kit
- Chemical spill kit
- Fire extinguishers
- Fire suppression system (if required by code)
- Portable loudspeaker and/or audible signal alarm

6) Fire Emergency and Hazardous Substance Response

Based on Project design and type, the Applicant considers the potential for fire emergencies or hazardous substance discharges within the Project to be very low. However, in the unlikely event of an incident, the SRP provides a detailed description of the Applicant's fire emergency and hazardous substance contingency plans. Hazardous substances will also be addressed through the Applicant's SPCC Plan, provided as Appendix 13-D and described in Exhibit 13.

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7) Coordination with Local Emergency Services

The Applicant will consult with local emergency services and provide training to local emergency services on responding to emergencies within the Project Site at least once per year as required by 19 NYCRR § 900-2.7(c)(7).

d) Review by Local Emergency First Responders

Copies of the Operations SSP and SRP (Appendix 6-A and Appendix 6-B, respectively) will be provided to the local first responders serving the Project Site. The Applicant will continue to coordinate with local first responders as the Project is planned and implemented.

The Applicant will also request review of these plans by the NYS Division of Homeland Security and Emergency Services. Comments received on these documents will be incorporated into the updated versions of these documents, if appropriate, prior to initiation of Project construction. Updated versions of the Operations SSP and SRP, if appropriate, will be provided to key first responders prior to commencement of Project construction.

e) Consultation with Emergency Management

The Project will not be located within any part of a city with a population over one million.

EXHIBIT 6: PUBLIC HEALTH, SAFETY AND SECURITY

Matter No. 21-1108

References

FAA. 2015. Advisory Circular: Obstruction Marking and Lighting. December 4, 2015. Available at: https://www.faa.gov/documentlibrary/media/advisory_circular/ac_70_7460-1l_.pdf. Accessed November 16, 2020.

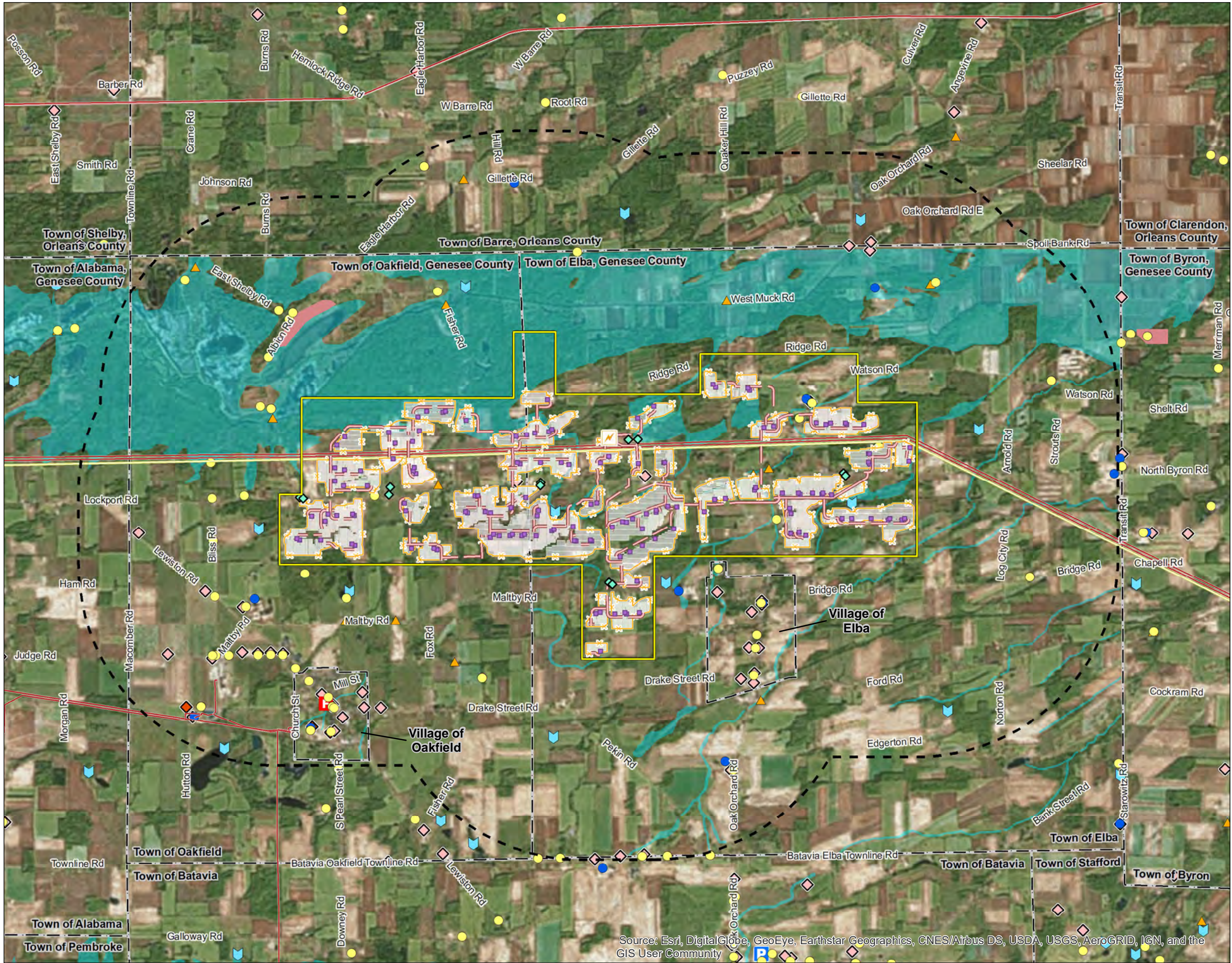
FEMA. 2020. FEMA National Flood Map Web Service. Available at: https://hazards.fema.gov/femaportal/usercare/guidesAndDocs/Documents/flood_map_svc.htm. Accessed November 20, 2020.

EXHIBIT 6: PUBLIC HEALTH, SAFETY AND SECURITY

Matter No. 21-1108

FIGURES

U:\190502038\03_data\gis\mxd\Application\Exhibit\Fig_6-1_Public_Health_Safety_Security_CSF.mxd Revised: 2021-04-28 By: astapleton

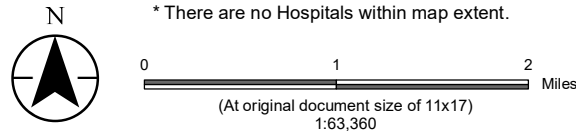


Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Legend

- Project Area
- 2-mile Study Area
- Proposed Layout
 - Substation and Switchyard
 - Inverter
 - Laydown Area
 - PV Panel Array
 - Collection Line
 - Fence Line
 - Access Road
- Bulk Storage
 - Chemical Bulk Storage
 - Major Oil Storage Facility
 - Petroleum Bulk Storage
- Existing Features
 - Bridges
 - Dams
 - EPA Facilities
 - Fire Station
 - Hospital*
 - Police/Law Enforcement
 - Public Water Supply
- Empire Gas Pipeline
- NYPA Transmission Line
- Municipal Boundary
- NYSDEC Remediation Sites
- 1% Annual Chance Flood (Q3)



Notes
1. Coordinate System: NAD 1983 StatePlane New York West FIPS 3103 Feet
2. Data Sources: Remediation Sites Boundaries; NYSDEC (<https://giservices.dec.ny.gov/gis/>), NYS GIS Clearinghouse (<https://gis.ny.gov>)
3. Background: Esri, Maxar, Earthstar Geographics, USDA FSA, USGS, Aerogrid, IGN, IGP, and the GIS User Community
4. As per the FEMA National Flood Map Web Service, the FEMA Q3 National Flood Layer displayed on this figure was derived from Flood Insurance Rate Maps (FIRMs) dated 1981 through 1984. FEMA notes that the Q3 data 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).



Project Location: Towns of Elba and Oakfield, Genesee County, NY
Prepared by AS on 2021-04-27
TR by EE on 2021-04-27
IR by NL on 2021-04-27

Client/Project: Hecate Energy Cider Solar LLC
190502038 REV B

Figure No.: 6-1

Title: Public Health, Safety and Security
Map 1 of 1