

Appendix 6-3

Agency Correspondence



Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2021-AEA-9650-OE

Issued Date: 08/16/2021

TRC
Samantha Kranes
215 Greenfield Parkway
Suite 102
Liverpool, NY 13088

**** DETERMINATION OF NO HAZARD TO AIR NAVIGATION ****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure:	Solar Panel Riverside Solar Project
Location:	Watertown, NY
Latitude:	44-03-42.18N NAD 83
Longitude:	76-04-17.01W
Heights:	328 feet site elevation (SE) 9 feet above ground level (AGL) 337 feet above mean sea level (AMSL)

This aeronautical study revealed that the structure does not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any, is(are) met:

Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/lighting are accomplished on a voluntary basis, we recommend it be installed in accordance with FAA Advisory circular 70/7460-1 M.

This determination expires on 02/16/2023 unless:

- (a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office.
- (b) extended, revised, or terminated by the issuing office.
- (c) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within 6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO

SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights, and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, effective 21 Nov 2007, will void this determination. Any future construction or alteration, including increase to heights, power, or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

If construction or alteration is dismantled or destroyed, you must submit notice to the FAA within 5 days after the construction or alteration is dismantled or destroyed.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

If we can be of further assistance, please contact our office at (718) 553-4199, or Dianne.Marin@FAA.GOV. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2021-AEA-9650-OE.

Signature Control No: 489693836-491509009

(DNE)

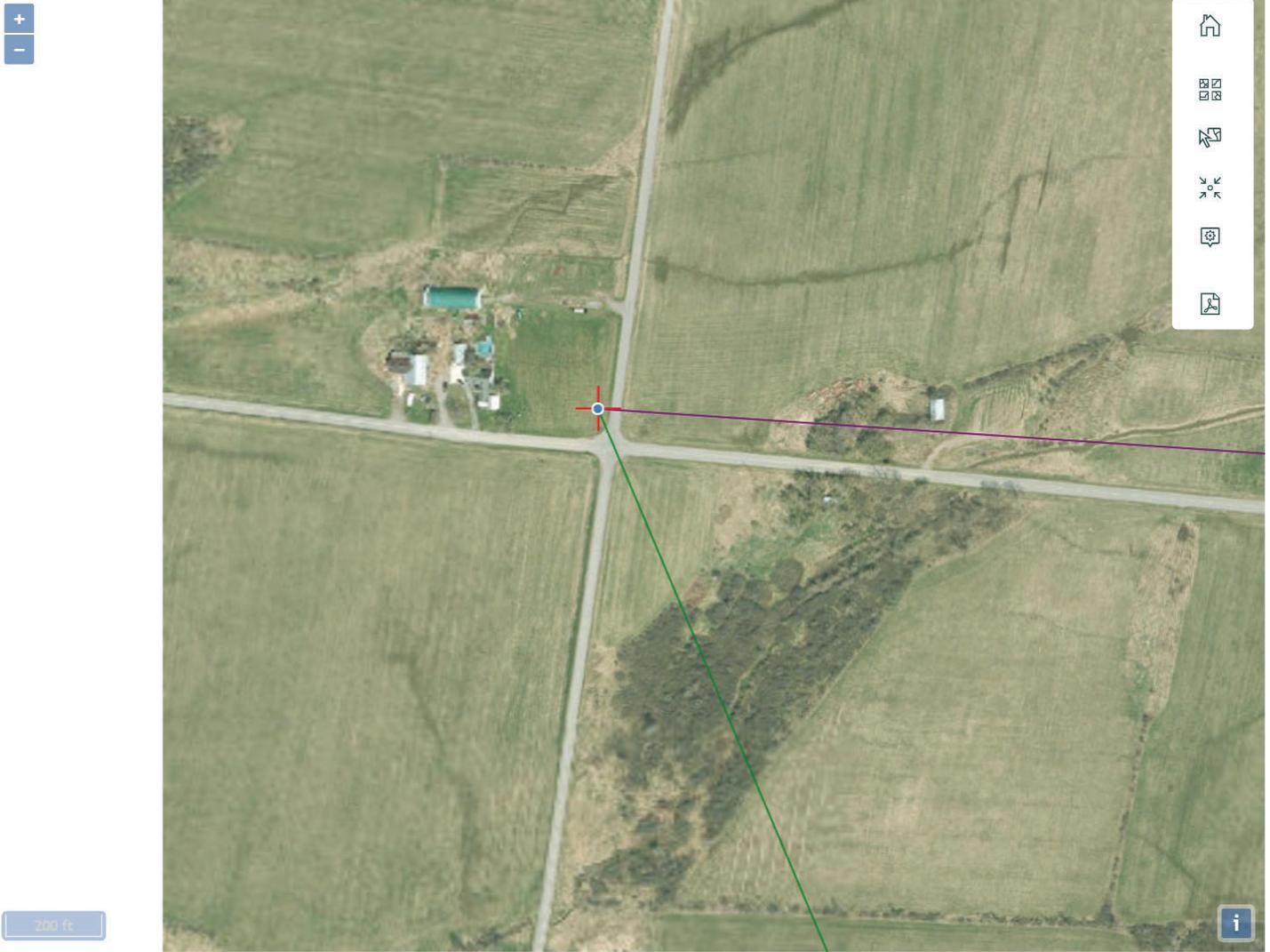
Dianne Marin
Technician

Attachment(s)
Case Description
Map(s)

Case Description for ASN 2021-AEA-9650-OE

Riverside Solar, LLC is proposing the development of a 100 MWac photovoltaic solar generation facility in the Towns of Lyme and Brownville in Jefferson County, NY. Proposed components include solar arrays, access roads, fencing, buried electric collection lines, and interconnection facilities.

Verified Map for ASN 2021-AEA-9650-OE





OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

3500 DEFENSE PENTAGON
WASHINGTON, DC 20301-3500

SUSTAINMENT

September 3, 2021

Alyssa Hessler
TRC Companies
1090 Union Road, Suite 280
West Seneca, NY 14224

Dear Ms. Hessler,

As requested, the Military Aviation and Installation Assurance Siting Clearinghouse coordinated within the Department of Defense (DoD) an informal review of the Riverside Solar Project. The results of our review indicated that the solar project, located in Jefferson County, New York, as proposed, will have minimal impact on military operations conducted in the area.

Please note that this informal review by the DoD Military Aviation and Installation Assurance Siting Clearinghouse does not constitute an action under 49 United States Code Section 44718 and that the DoD is not bound by the conclusion arrived at under this informal review. To expedite our review in the Obstruction Evaluation Airport Airspace Analysis (OE/AAA) process, please add the project number 2021-07-S-DEV-22 in the comments section of the filing. If you have any questions, please contact me at scott.e.kiernan.civ@mail.mil or at 571-255-9507.

Sincerely,

A handwritten signature in blue ink, reading "Scott E. Kiernan", is positioned below the "Sincerely," text.

Scott E. Kiernan
Deputy Director
Military Aviation and Installation
Assurance Siting Clearinghouse

From: Jenny Monson-Miller <jenny@geronimoenergy.com>
Sent: Monday, March 30, 2020 2:38 PM
To: Jim Muscato (Guest); Rob Panasci (Guest); Kranes, Samantha; Effler, Hayley; Silva, Rachel; Schwabenbauer, Brian
Cc: Eric Will (Guest); Brett Hastings (Guest); Derek Hasek (Guest)
Subject: [EXTERNAL] FW: [Non-DoD Source] Large Scale Solar Development

This is an EXTERNAL email. Do not click links or open attachments unless you validate the sender and know the content is safe.

Good news from Fort Drum, thanks to Eric!

Jenny Monson-Miller
Permitting Specialist
Email: jenny@geronimoenergy.com
Direct: 952-358-5687

Geronimo Energy, a National Grid Company
8400 Normandale Lake Boulevard
Suite 1200
Bloomington, MN 55437

Main: 952-988-9000-----Original Message-----

From: Eric Will <eric@geronimoenergy.com>

Sent: Monday, March 30, 2020 12:41 PM

To: Jenny Monson-Miller <jenny@geronimoenergy.com>

Cc: Brett Hastings <bhastings@geronimoenergy.com>; Derek Hasek <dhasek@geronimoenergy.com>

Subject: FW: [Non-DoD Source] Large Scale Solar Development

Jenny, please see the email below from my contact at Fort Drum. I had provided them with the maps for Riverside, Sugar Maple, and New Bremen. Eric

Eric Will
New York Area Manager
Email: eric@geronimoenergy.com
Direct: 315-952-3611

Geronimo Energy, a National Grid Company -----Original Message-----

From: Draught, Sonja E CIV USARMY IMCOM (USA) <sonja.e.draught.civ@mail.mil>

Sent: Monday, March 30, 2020 1:12 PM

To: Eric Will <eric@geronimoenergy.com>

Cc: Kennedy, Andrew R CIV USARMY USAG (USA) <andrew.r.kennedy.civ@mail.mil>; Hersey, Kenneth S CIV USARMY USAG (USA) <kenneth.s.hersey.civ@mail.mil>; Dropps, Lloyd G Jr CIV USARMY USAG (USA) <lloyd.g.dropps.civ@mail.mil>

Subject: RE: [Non-DoD Source] Large Scale Solar Development

Eric,

Good afternoon. Fort Drum has reviewed the maps provided to us and do not foresee any impact to operations.

Please let me know if you have any further questions or concerns and I can link you directly to our installation subject matter experts.

Thank you!

SONJA E. DRAUGHT, CPM®

Chief, Plans, Analysis & Integration Office

USAG Fort Drum

O - 315-772-8263

C - 315-955-4225

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-----Original Message-----

From: Eric Will [mailto:eric@geronimoenergy.com]

Sent: Friday, March 27, 2020 1:57 PM

To: Draught, Sonja E CIV USARMY IMCOM (USA) <sonja.e.draught.civ@mail.mil>

Cc: Kennedy, Andrew R CIV USARMY USAG (USA) <andrew.r.kennedy.civ@mail.mil>

Subject: RE: [Non-DoD Source] Large Scale Solar Development

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

Sonja, no problem.....how about 11:00 AM or 1:00 PM on Tuesday? Thanks, Eric

Eric Will

New York Area Manager

Email: eric@geronimoenergy.com

Direct: 315-952-3611

Geronimo Energy, a National Grid Company -----Original Message-----
From: Draught, Sonja E CIV USARMY IMCOM (USA) <sonja.e.draught.civ@mail.mil>
Sent: Friday, March 27, 2020 1:10 PM
To: Eric Will <eric@geronimoenergy.com>
Cc: Kennedy, Andrew R CIV USARMY USAG (USA) <andrew.r.kennedy.civ@mail.mil>
Subject: RE: [Non-DoD Source] Large Scale Solar Development

Mr. Will,

I apologize but I will need to postpone our teleconference this afternoon. Our airfield team has not had the opportunity to review the maps you sent me last night.

Can we reschedule for Tuesday? Again what will work best for you?

Sonja

SONJA E. DRAUGHT, CPM®

Chief, Plans, Analysis & Integration Office

USAG Fort Drum

O - 315-772-8263

C - 315-955-4225

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Did we meet your needs? Let us know!
Caution-<http://ice.disa.mil>

-----Original Message-----
From: Draught, Sonja E CIV USARMY IMCOM (USA)
Sent: Thursday, March 26, 2020 9:57 PM
To: Eric Will <eric@geronimoenergy.com>
Cc: Kennedy, Andrew R CIV USARMY USAG (USA) <andrew.r.kennedy.civ@mail.mil>
Subject: Re: [Non-DoD Source] Large Scale Solar Development

Eric

How about I call you at 2:00!

Thanks

Sent from my iPhone

> On Mar 26, 2020, at 4:08 PM, Eric Will <eric@geronimoenergy.com> wrote:

>

> All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

>

>
>
>
> ----
>
> Hi Sonja and thanks for getting back to me so quickly. I'm open from
> 2:00 to 5:00 tomorrow. Is there a slot in that window that would work
> for you? Thanks, Eric
>
> PS - I'll forward some maps to you.
>
>
> Eric Will
> New York Area Manager
> Email: eric@geronimoenergy.com
> Direct: 315-952-3611
>
> Geronimo Energy, a National Grid Company -----Original Message-----
> From: Draught, Sonja E CIV USARMY IMCOM (USA)
> <sonja.e.draught.civ@mail.mil>
> Sent: Thursday, March 26, 2020 3:56 PM
> To: Eric Will <eric@geronimoenergy.com>
> Cc: Kennedy, Andrew R CIV USARMY USAG (USA)
> <andrew.r.kennedy.civ@mail.mil>
> Subject: FW: [Non-DoD Source] Large Scale Solar Development
>
> Mr. Will,
>
> Are you available tomorrow for a phone discussion, my calendar is pretty open so provide a few times that will work
for you?
>
> Also, do you have maps of the locations?
>
> Thank you
>
> SONJA E. DRAUGHT, CPM(r)
>
> Chief, Plans, Analysis & Integration Office
>
> USAG Fort Drum
>
> O - 315-772-8263
>
> C - 315-955-4225
>
> We Are The Army's Home
>
> Did we meet your needs? Let us know!
> Caution-Caution-<http://ice.disa.mil>
>
>
> -----Original Message-----

> From: Wagenaar, Henricus Francisc (Eric) CIV USARMY USAG (USA)
> Sent: Thursday, March 26, 2020 3:48 PM
> To: Eric Will <eric@geronimoenergy.com>; Kennedy, Andrew R CIV USARMY
> USAG (USA) <andrew.r.kennedy.civ@mail.mil>; Draught, Sonja E CIV
> USARMY IMCOM (USA) <sonja.e.draught.civ@mail.mil>
> Cc: Behnkendorf, Melissa A CIV USARMY USAG (USA)
> <melissa.a.behnkendorf.civ@mail.mil>
> Subject: RE: [Non-DoD Source] Large Scale Solar Development
>
> Good afternoon Eric - thanks for the note. I will have my plans and operations folks set up a phone call with you.
>
> Sonja - should be in touch soon.
>
> Mr. Eric Wagenaar
> Deputy Garrison Commander
> Fort Drum, N.Y.
>
> Phones:
> Office: 315-772-5501
> Cell: 315-286-3913
> Pers Cell: 315-955-4874
>
> "We are the Army's Home - Serving the Rugged Professional"
>
>
>
> -----Original Message-----
> From: Eric Will [Caution-Caution-mailto:eric@geronimoenergy.com]
> Sent: Thursday, March 26, 2020 3:39 PM
> To: Wagenaar, Henricus Francisc (Eric) CIV USARMY USAG (USA)
> <henricus.f.wagenaar.civ@mail.mil>
> Subject: [Non-DoD Source] Large Scale Solar Development
>
> All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the
authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.
>
>
> _____
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>
> Good Afternoon, Eric. I was given your name and email address by Don
> Alexander at the Jefferson County Economic Development office. Also,
> in a recent meeting with Scott Gray and Bob Hagemann, your name
> surfaced as the logical person for me to reach out to at Fort Drum. I
> represent Geronimo Energy, a National Grid Company, here in New York
> State (I live in Syracuse). We are a national developer of wind and
> solar projects, but here in New York we've confined our efforts to
> solar. Presently, we have four large (100+ MW) projects in the North
> Country that have commenced the Article 10 siting process and I'd like
> you to be aware of them. While we don't believe any of them will pose

> issues, we recognize that Fort Drum is a significant regional
> stakeholder and want to make certain you're in the loop on what we're
> trying to accomplish. In a perfect world I'd ask for a personal
> meeting, but given the situation we're in right now perhaps an initial
> phone call would be in order. If you're agreeable to speaking with me
> perhaps you could suggest some times that would work for you. Thank
> you very much and kind regards, Eric
>
>
>
> <Caution-Caution-Caution-<https://www.linkedin.com/company/geronimo-wind-energy/>> <Caution-Caution-Caution-
> <https://twitter.com/geronimoenergy>> <Caution-Caution-Caution-<http://www.geronimoenergy.com/>>
>
> Eric Will
> New York Area Manager
> E:
>
> eric@geronimoenergy.com
> P:
>
> 315-952-3611
> _____
> 8104 Cazenovia Road
> Building 3, 2nd floor,
> Manlius, NY 13104
> <Caution-Caution-Caution-<https://www.google.com/maps/search/?api=18104>
> Cazenovia Road
Building 3, 2nd floor>
> 952-988-9000
>
>



215 Greenfield Pkwy.
Suite 102
Liverpool, NY 13088

T 315.671.1600
TRCcompanies.com

July 2, 2021

NYS Division of Homeland Security and Emergency Services

1220 Washington Avenue

State Office Campus

Building 7A Suite 710

Albany, NY 12242

Sent via email NYSOEM.Planning@DHSES.ny.gov

**Subject: Riverside Solar, LLC; Riverside Solar Project
Towns of Lyme and Brownville, Jefferson County, New York
Emergency Response Plan and Site Security Plan**

To Whom It May Concern:

Riverside Solar, LLC (Riverside) is proposing the development of a solar energy generation facility in the Towns of Lyme and Brownville in Jefferson County, New York. Riverside plans to submit an application to the NYS Office of Renewable Energy Siting (ORES) in pursuit of a Permit for a Major Renewable Energy Facility under Section 94-c of the New York State Executive Law to construct the Riverside Solar Project (the Facility).

Riverside is proposing to construct the Facility, a 100 megawatt, alternating current (MWac) photovoltaic solar facility on property leased or purchased from private landowners (Facility Site). The Facility may consist of tracking technology PV panels installed on low-profile racking systems mounted on poles driven directly into the ground. Inverters, which collect the electricity by the panels and convert it from direct current to alternating current, will be spaced throughout the Facility. A new collection substation will take the power from the inverters and step it up to match the voltage of the electrical grid and tie in via the existing Lyme to Lyme Tap 115 kV transmission line immediately adjacent to the Facility Site. A protective fence will surround the Facility. The Facility is scheduled for construction in late 2022.

As part of the State's Section 94-c Application review process, and as required under §900-2.7(d), Riverside is providing a copy of the Facility's Emergency Response Plan and Site Security Plan to the New York State Division of Homeland Security and Emergency Services (DHSES) for review and comment. The general layout of the Facility is presented as Figure 1 in the Emergency Response Plan. Please let us know if you have any comments or questions on the attached plans. Additional information can be found on the Facility website at www.aes.com/riverside-solar-project.

We appreciate any feedback DHSES is able to provide. If you have any questions regarding the Facility or the request herein, please contact me at TRC by calling (315) 362-2415 or via email at SKranes@TRCcompanies.com.

Sincerely,

Samantha Kranes
Senior Project Manager

cc: Josh Baird – AES
Brett Hastings – AES
Eric Will - AES

Attachments: Attachment A. Emergency Response Plan
Attachment B. Site Security Plan



Attachment A
Emergency Response Plan



Highest standards



RIVERSIDE SOLAR, LLC

Matter No. 21-00752

Towns of Lyme and
Brownville
Jefferson County, NY

Emergency Response
Plan

June 2021

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Figure 1. General Layout of the Riverside Solar Project	
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Riverside Solar, LLC

Emergency Response Plan

1.0 Purpose

The Riverside Solar, LLC Project (Facility) Emergency Response Plan (ERP) is intended to provide definitions of emergency situations that may occur over the life of the Facility, and provide responsibilities and guidelines on how to address each type of emergency to minimize or completely prevent negative impacts to the Facility, emergency service members, and surrounding community.

As the Facility is being permitted under Section 94-c of the New York State Executive Law, this Plan has been prepared in accordance with the requirements of §900-2.7(c) regarding safety response and serves as the “Safety Response Plan” required per the regulations. This Plan is preliminary in nature and will be updated to include specific contact information for on-Site personnel prior to construction as part of the Compliance Phase of the Facility. Responsible persons will have to take actions according to the steps mentioned herein, as their judgment dictates based upon the conditions that arise for each emergency. These guidelines are intended to assist in making timely decisions and taking appropriate actions. For information on security for the Riverside Solar Project, see the Riverside Site Security Plan prepared in accordance with §900-2.7(b).

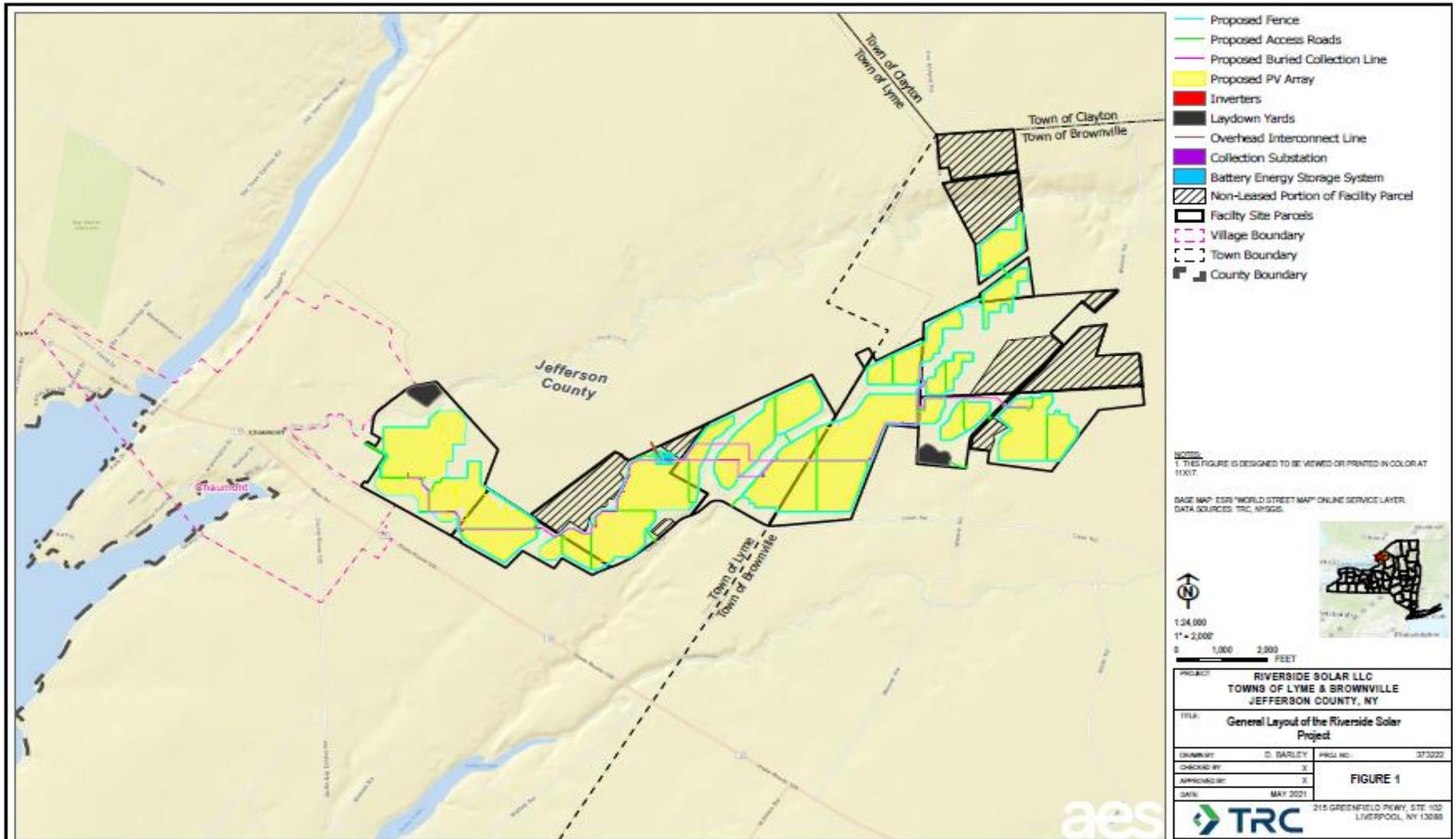
2.0 Facility Information

The Facility is a 100-megawatt (MW) ground-mounted solar electric generation facility located in the Towns of Lyme and Brownville, within Jefferson County, New York. The Facility is owned and operated by Riverside Solar, LLC (Operator). Facility lands consist of parcels owned by or under lease agreement with Riverside Solar, LLC. The Facility itself consists of photovoltaic (PV) modules oriented in linear rows that are connected by electrical cables hung on the underside of the modules or buried underground. “Blocks” of modules are connected to an inverter, which converts direct current (DC) electricity to alternating current (AC) electricity. The AC power is then routed via 34.5-kilovolt (kV) collector lines to the Facility collection substation and interconnection facilities. Gravel roads are constructed throughout the Facility to facilitate access for maintenance and repair.

The Facility panels are divided between nine parcels. Panels can be accessed from different local roads throughout the Facility Site. These roads include NY Route 12E, Case Road, Weaver Road, and County Road 125. Each panel array area of the Facility is enclosed by seven-foot-tall chain-link fencing, with barbed wire topping the substation perimeter fencing, to ensure public safety. All gravel access roads have been designed to facilitate access throughout the Facility. Roads are a minimum of 12 feet wide, with the exception of 20-foot-wide equipment pads. The Facility boundary and panel locations are depicted on Figure 1.

Riverside Solar, LLC is a wholly owned, indirect subsidiary of the AES Corporation (AES), which is located in Arlington, Virginia. AES puts safety first every minute of every day – for people, contractors, and communities. This means AES’s work to identify, assess, and mitigate occupational safety risks is never finished. AES has established contractor safety protocols that verify contractor qualifications and outline required training for all contractors before beginning work. This includes site- and task-specific safety training that must be completed prior to starting a contract. AES’s safety incident reporting is substantially based on U.S. Occupational Safety and Health Administration (OSHA) reporting requirements (29 CFR 1904) and tracks proactive and reactive safety metrics, which includes safety walk performance, identification of unsafe behaviors and conditions, near-miss incidents, and progress on safety action plans. These metrics aim to prevent the occurrence of incidents and injuries. The Applicant will effectively implement similar practices to ensure that safety and security risks remain minimal during Facility construction and operation.

FACILITY INFORMATION



3.0 General Safety Information

3.1 Operational Contacts

In the event of an emergency, 911 will be called as soon as possible. 911 calls in Jefferson County are routed directly to a dispatch center in the County, where 21 full-time Public Safety Dispatchers address calls according to the type of emergency.

The departments and agencies listed in Table 1 below may require coordination regarding this plan as well as operation of the Facility. The appropriate AES/Riverside Solar operational contact will be included within the Final ERP.

Table 1. First Responders and Emergency Services Contact Information

DEPARTMENT/AGENCY	CONTACT	ADDRESS
Three Mile Bay Fire Department	Justin Bourquin, Fire Chief	8581 NYS 12 E PO Box 419 Three Mile Bay, NY 13693 (315) 783-8733
Chaumont Fire Department	Fred Jackson, Fire Chief	11385 St. Rt. 12E Chaumont, NY 13622 (315) 777-5442
Brownville Fire Department	Ryan McIntosh, Fire Chief	121 Brown Blvd Brownville, NY 13615 (315) 639-3054
New York State Police, Troop D	N/A	Route 5, P.O. Box 30 Oneida, NY 13421 315-366-6000
Jefferson County Fire and Emergency Management	Joseph D. Plummer, Director	753 Waterman Drive Watertown, NY 13601 (315) 786-2654
Jefferson County Sheriff's Office	Colleen M. O'Neill, Sheriff	753 Waterman Drive Watertown, NY 13601 (315) 786-2700
NYSDEC Region 6 Office	Randall Young, Regional Director	317 Washington Street Watertown, NY 13601 (315) 785-2239
AES O&M Manager	Joel Loesche	(281) 928-5510
AES Safety Manager	Jonathan Hill	(910) 674-7331

3.2 Precautions While in the Vicinity of the Solar Electric System

Only trained and appropriately certified Facility personnel are to conduct work near the electrical equipment associated with the Facility. A minimum of two Facility personnel will be present when handling any electrical equipment so that in an emergency, one would be available to respond with first aid and/or Cardiopulmonary Resuscitation (CPR) if necessary. Emergencies or significant issues will be reported as soon as possible to the Operator. Broken panels will not be handled without wearing electrical insulating gloves, because touching cracks in the glass with bare skin could convey the full current and voltage of the array to an individual. It should always be assumed that Facility components contain lethal AC and DC voltages. The most hazardous components are the inverters and disconnects, wiring and electrical boxes, and the substation.

The power should only be shut off when directed by the Operator. If an emergency occurs that requires shutting the Site down, the solar array power blocks can be shut off at the inverters by Facility personnel. In these situations, the switches should be manually turned off, which would cause the AC and DC switches to be turned off within the inverters. Then the DC disconnect switch should be turned off and locked. These instructions are detailed on an instruction sheet on all inverters.

3.3 Training

The Operator will work with emergency departments with jurisdiction over the Facility (state and local), as applicable, to provide any necessary emergency response trainings to the appropriate staff. This will occur prior to operation and periodically throughout the life of the Facility to ensure that individuals responding are prepared to address an emergency while minimizing any safety risks.

4.0 Emergency Situations

AES personnel and subcontractors working at the Facility Site shall call AES for assistance, based on the significance of the emergency. All work-related injuries and illnesses must be reported immediately to AES.

4.1 Contingencies that would Constitute a Safety or Security Emergency

Contingencies that have the potential to constitute safety or security emergencies include:

- Fire;
- Natural emergency, severe weather;
- Physical threat, security breach, crime;
- Cyber security;
- Environmental accident, spill; or
- Injuries and/or serious health conditions.

4.2 Emergency and Evacuation Response Measures

Below is a list of emergency response measures that apply to all contingencies.

- AES personnel and subcontractors working at the Facility Site shall assess any developing emergency situation and contact appropriate Facility personnel and/or local emergency services for assistance, based on the significance of the emergency. This will be conducted as soon as possible to minimize any potential negative impact to Facility personnel, equipment, or the surrounding environment. All work-related injuries and illnesses must be reported immediately to AES.
- If the emergency requires external emergency responders to arrive on the Site, the initial responder must coordinate the response. For emergencies of a significant nature, like fire or ambulance for a medical emergency, the initial responder shall call 911.
- Based upon the type, magnitude, and extent of the emergency, the initial responder or Site Leader will determine whether evacuation of the Facility Site should be initiated. If an evacuation is determined to be necessary, a determination must be made of the type of evacuation to direct (immediate or delayed).
- Solar and substation components are always hot and should always be considered electrically energized.
- Leave the scene in a safe and stable condition after mitigating hazards.

Fire Emergency

This section describes the actions that should be taken by Facility personnel and emergency services if a fire were to occur at the Facility Site, in order to protect the health and safety of individuals and the environment, and to minimize any damage to Facility equipment. Fire extinguishers will be present on Site in compliance with the fire code section of the New York State Uniform Fire Prevention and Building Code adopted pursuant to Article 18 of the Executive Law. This includes areas where flammable or combustible liquids are stored, used, or dispensed, and near electrical equipment.

- Ensure the safety of Facility personnel, assess the severity of the fire, and notify the appropriate people and emergency response departments of the situation. If the initial responder would be significantly delayed in extinguishing the fire by first getting to a radio or phone to report it, the fire should first be safely extinguished as soon as possible. This situation would apply if the fire could be controlled or extinguished with one portable fire extinguisher, and if the initial responder is able to maintain an adequate level of safety in attempting to do so. The initial responder, or the individual that discovers a fire within the Facility Site, must immediately provide the following information to the Operator:
 - The location and perceived source of the fire;
 - Any identified injuries that have occurred as a result of the fire; and
 - Appropriate actions that will be taken to extinguish the fire, if save to do so.
- The Site Leader will determine whether any equipment or activities need to be shut down/ceased.
- The individual appointed by the person in charge will shut down equipment as instructed, announce the type and location of the emergency over the radio system, notify the Site Leader or other Person in Charge, and contact local emergency response services and provide the following information:
 - Type of fire emergency;
 - Location and magnitude of the fire;
 - Whether people nearby are in any immediate danger;
 - Any known injuries related to the fire; and
 - Any other pertinent information.
- That individual will then contact the local fire department, contact the System Operator or Transmission Operator if appropriate; and assign an individual to meet the emergency services at the entrance to the Site in order to direct them to the emergency.
- The Site Leader or other Person in Charge will assess the extent of the fire, and determine the area to be isolated, whether evacuation is necessary, and what equipment or activities will need to be shut down/ceased. They will then instruct the control room to

notify the local emergency response services of the need for assistance if it is determined necessary.

- Site personnel that are tasked with escorting the emergency services to the location of the fire may also be called on to provide specific information about the dangers of Facility equipment and electrical sources, as well as any chemicals that may pose a hazard.
- All other Facility personnel that are not directly responding to the fire will report to their designated muster stations. All persons will be accounted for and will remain there until the “all clear” is issued.
- Upon arrival to the Facility, emergency responders are expected to evacuate and secure the area as appropriate. Personnel will be kept a minimum of 300 feet away from the fire, provided there are no immediate threats to people or non-solar property that would require closer access. The Facility will be left to burn because burning electrical equipment is already damaged and must be replaced. Once the fire is under control or everyone is at a safe distance as it is left to burn, the emergency responders will manage adjacent areas (homes and forested areas) as needed, to limit the potential of the fire spreading. If the fire must be suppressed within the fence line, the Operator will direct local authorities on how to proceed.

Natural Emergency or Severe Weather

The Facility is located in a region that may experience snowstorms, and although less likely, minor earthquakes, flooding, hurricanes, or high wind events (e.g., microbursts). The Facility Components are built to withstand type of extreme weather likely to be encountered, including snowstorms, hail, high winds, heavy rain, flooding waters, and lightning. However, these weather events may be detrimental to Facility personnel, the environment, and Facility Components. Local radio stations, TV stations, internet weather and news sites, and on-Site weather systems track and issue warnings about developing weather emergencies, which the Site Leader and the Operator are to monitor in case these conditions approach the Facility Site. Once a severe weather event has passed, all equipment will be evaluated by the Operator for damages. Repairs will be completed as necessary to resume Facility operations if they had been interrupted. Protective measures to promote safety during these weather incidences include:

- When a severe weather watch or warning has been issued through the sources mentioned previously, the Site Leader will notify their direct Manager and Facility personnel.
- The Manager will determine whether to shut down and/or evacuate the Site depending on the severity of the weather situation, such as when high winds, flooding, or hail are forecasted. Equipment shutdown procedures should be performed in compliance with the Site’s operating practices and plans that ensure the prioritization of safety.
- Site personnel will seek indoor shelter in a reinforced structure or other designated secure location and will remain indoors as long as the severe weather is affecting the immediate surroundings.

- The following actions will be undertaken as applicable in order to secure the Site prior to severe weather events, as long as it is safe to do so.
 - Evacuate Site personnel from open areas where solar racking or other conductive materials are located, especially if lightning has been forecasted or observed nearby;
 - Secure portable equipment such as trash cans and tools, or store them indoors;
 - Close and latch storage containers and construction trailers;
 - Move to a sheltered location. If sheltering inside of a vehicle, ensure that it contains a survival kit and sufficient gasoline; and
 - Conduct a head count of all Site personnel, ensuring that they are safe and accounted for.

- The Operation and Maintenance (O&M) Team on the Site is responsible for lightning monitoring. Lightning monitoring shall be documented on a “lightning log” to ensure adequate monitoring and response to Site activity. When lightning activity threatens the Site, the following incremental steps will be taken to minimize personnel exposure:
 - When lightning is detected 30 miles away from the Site, notify Site personnel of increased lightning hazard, and prepare to cease outdoor activity.
 - When lightning is detected 10 miles away from the Site, cease outdoor activity other than securing equipment. Personnel not occupied with securing equipment will move to designated shelters. A Stand-down will last for 30 minutes from the last lightning within a 10-mile radius.
 - When lightning is detected 7 miles away from the Site, immediately cease all outdoor activity. Abandon efforts to secure equipment if not completed. All personnel are to take cover in designated shelter.

Physical Threat, Security Breach, or Crime

Physical security at the Facility can be threatened or compromised by terrorism, physical intrusion or vandalism, and other similar events. If a hostile intruder enters the Facility Site with perceived ill intent, Facility personnel, visitors, and contractors must quickly determine the best course of action for their own safety, depending on their location within the Site (close to an escape route or shelter), proximity to the hostile intruder, etc. In addition to the general emergency response measures, each individual present at the Site has the option to evacuate (leave replaceable items and flee the area), hide out of view, take action (as last resort and only when your life is in imminent danger), and/or call 911 when safe to do so.

If threatening correspondence is received verbally (either by phone, radio, or in person), as much information as possible should be obtained from the person issuing the threat, for as long as possible. For threats received via phone, the time of the call will be noted, the caller will not be interrupted, and the tone of his or her voice will be described, as well as any background sounds.

If the threat is received via written correspondence, the correspondence will be placed in a location where it will not be disturbed until the local authorities can be contacted.

After gathering information about the threat, the Site Leader will be notified, and Security Operations and local law enforcement will be contacted, as applicable (e.g., 911). Then the Physical Security Event will be described to all on-Site personnel.

Cyber Security Emergency

Notification of a cyber security-related emergency may come from an outside source, or any of the following sources:

- A business partner or manager;
- A system page or email alert to an administrator or the Operator;
- Release of an awareness notification from the Operator;
- Corporate Security or the Information Management Support Center;
- A Business Unit designated to be contacted by a source outside the First Responder;

If a cyber security-related emergency is discovered, the Immediate Supervisor, Corporate Security, Operator, Local Emergency Services, and/or the Transmission System Operator will be notified, as appropriate. Cyber assets will be restored to normal operations by reloading data from backup tapes, reinstalling cyber assets from their original distribution media, or other means. The assets, once restored, will be tested to ensure they will function correctly and not be affected by the same issues or vulnerability once they are placed back in production. Evacuation of the Site is not likely to be necessary during these situations, but the Site Manager will determine whether that is appropriate.

Environmental Accident or Spill

The best defense against spills is prevention. The easiest way to prevent spills is to conduct proper vehicle maintenance and inspections, never place vehicles or equipment in or near sensitive environments, and to store all materials in protected areas.

If a chemical, oil, or Heat Transfer Fluid (HTF) spill or release is identified as significant and has the potential to pose health hazards or significant negative environmental impacts, Facility personnel will call for trained outside responders to respond. This response will include cleaning up the spilled substances, and in some cases, stopping the source of a spill. Equipment to handle hazardous substance incidences will be located on-Site in compliance with the New York State Uniform Fire Prevention and Building Code adopted pursuant to Article 18 of the Executive Law. Details on the cleanup actions to be taken are as follows:

- If the spill originated from an action, the individual that performed that action or an individual that initially observed the release will attempt to stop the release, if possible to do so without exposure to the substance being released.

- All Facility personnel should evacuate the area where the spill is occurring or has occurred to observe from a safe distance.
- The spill occurrence will be communicated to others nearby, and the Site Leader should be notified as soon as possible via radio or whichever mode of communication would be fastest. The following information should be provided:
 - Type of substance spilled/released;
 - Location(s) and boundaries of spill/release;
 - Whether the origination of the spill/release has been stopped, and whether it is contained;
 - Whether any Facility personnel have been injured exposed to the substance;
 - Estimated quantity of substance released; and
 - Potential environmental impacts (waterbodies, streams, ground, etc.).
- The Construction Manager / O&M Manager or the Contractor Supervision will evaluate whether the spill/release poses a threat to the surrounding environment or community. If so, 911 will be called as soon as possible.

Several measures can be taken to prepare for quick and effective containment of any potential spills prior to undertaking construction activities. First and foremost, each contractor shall keep adequate supplies of spill containment equipment at the construction site. These shall include both specialized spill containment equipment and excess supplies of straw bales, silt fencing, and portable vacuum pumps, to be available as needed. All AES vehicles will be equipped with a spill kit. Other spill containment measures include using drip pans and/or absorbent materials underneath vehicles and equipment every time refueling, servicing, or maintenance activities are undertaken.

Notification procedures for spills are as follows:

A formal notification process shall be initiated when a spill or potential spill is first observed. Immediate actions are necessary. The first individual who discovers a spill (spill observer) will be responsible for initiating notification and response procedures. All personnel responsible for responding to spills must have completed training in recognition and response to spills of hazardous materials. AES is responsible for providing spill recognition and response training for all AES Facility personnel. The Facility personnel who must be notified and will assist in hazardous spill response include, but are not limited to the Spill Observer, AES Facility Management, Contractor Supervision (if applicable), Construction Manager / O&M Manager, and the Spill Response Team. General responsibilities of the designated personnel are outlined as follows:

Spill Observer is the first person to witness a spill. They must immediately:

- Make an assessment of the incident as observed;

- If the incident can be safely controlled, take steps to do so. For example, shut off the source of spill;
- Notify AES Facility Management. Provide as much information as possible; and
- Begin to fill out the Spill Notification Checklist.

AES Facility Management will initiate the following actions:

- Notify the Construction Manager / O&M Manager and the Contractor Supervision;
- Make sure all personnel are removed from the spill area;
- Take immediate actions to minimize any threat to public safety (verify the spill area has been cordoned off);
- Secure the source of the spill, if safely possible to do so;
- Maintain close observation of the spill; and
- Monitor Contractor's personnel.

Contractor's Representative is the Contractor's Supervision, or other Contractor personnel designated to fulfill the Contractor's responsibilities. They will:

- Determine if the spill response team is needed to accomplish cleanup;
- Determine if additional spill response support is necessary;
- Coordinate with the Construction Manager / O&M Manager to initiate spill response;
- Initiate Spill Response Team;
- Complete containment, cleanup and disposal of hazardous waste; and
- Complete Spill Notification and send to AES O&M Manager and AES Safety Manager.

O&M Manager will:

- Coordinate with the Contractor's Representative regarding level of spill response required; and
- Notify governmental agencies if necessary.

Spill Response Team are Contractor employees or outside companies hired by the Contractor who are designated to respond to spills. The Spill Response Team will:

- Follow the specific spill response procedures outlined in the Plan; and
- Take direction from the Contractor's Representative for additional actions needed for spill response.

Injuries and/or Serious Health Conditions

- If an injury occurs or health condition arises that requires medical care, Facility personnel should contact 911 immediately so that trained medical responders can assess and address the situation as appropriate. First aid can then be applied by Facility personnel until the medical responders arrive.
- The locations of the nearest non-emergency Worker's Compensation approved medical facility as well as the Occupational Nurse will be posted at the Facility Site along with their name, address and phone number. However, 911 responders will likely determine the best location for urgent emergency care.
- At least one up to date (inspected monthly) first aid kit will be kept at the work site, and one will be kept in each employee personnel vehicle. At any given time, a minimum of one employee on Site will be trained in CPR, and in the use of an AED (Automated External Defibrillator). Information will be provided on how to sign up for CPR and AED safety training. If one is available at the Site, the AED will be accessible to all staff at a known location, will include clear instructions for its use and records of maintenance and testing. Facility personnel will be given an annual demonstration on operation of the AED. Any AED present at the Facility will be tested and inspected per the manufacturer's recommendations, and the dates of each inspection will be documented.
- Subcontractor management is responsible for getting injured parties to the hospital and emergency treatment at the nearest health care facilities in the most efficient manner possible based on perceived injuries, using ambulance, paramedic units, or Air Evacuation as needed.
- For all first aid medical incidents and non-emergency situations like a minor injury, the Site Leader will be contacted to help provide support. Subcontractor Safety Personnel should accompany the injured party and use the local occupational medical clinic or hospital nearest the Facility Site.
- Subcontractors must establish their own First Aid stations. They shall be made available to their workforce and provided in each trailer and in all trucks on the Site.

Basic First Response Actions

The following first aid steps are recommended by the American Red Cross.

- Check the scene and the ill or injured person. Assess whether the scene is safe to enter, how many people are involved, what happened, whether the illness or injury may be life-threatening (such as severe bleeding), and whether others are available to help.
- If the person is awake and responsive and there is no severe life-threatening bleeding, you should first obtain consent by telling the person your name, describing your type and level of training, stating what you think is wrong and what you plan to do, and asking permission to provide care. Then tell a bystander to get the AED and first aid kit. Use appropriate Personal Protective Equipment (PPE) such as gloves, if available. While

doing this, ask the ill or injured person about any relevant symptoms, allergies, medications, pertinent medical history, last food or drink and events leading up to the incident.

- If the person appears unresponsive, shout to get their attention, using the person's name if it is known. If there is no response, tap the person's shoulder and shout again, while checking for normal breathing.
- If the person is breathing, send someone to call 911 or the designated emergency number and obtain an AED and first aid kit. Gather information from bystanders and conduct a head-to-toe check for signs of injury. If there are none, roll the person onto his or her side into a recovery position.
- If the person is not breathing, send someone to call 911 or the designated emergency number and obtain an AED and first aid kit. Ensure that the person is face-up on a firm, flat surface such as the floor or ground. If you are trained in giving CPR and using an AED, Begin CPR (starting with compressions) or use an AED as appropriate if one is immediately available. Continue administering CPR until the person exhibits signs of life, such as breathing, an AED becomes available, or emergency medical services or trained medical responders arrive on scene.
- Identification and emergency response measures for specific types of injuries that may be encountered are described below. If the person is responsive but has an obvious severe physical injury or is exhibiting signs of shock, call 911 immediately, and follow the appropriate steps listed below per the type of injury, if applicable. If the person has visibly broken bones or is bleeding profusely, or neck/spine injuries are likely to have occurred, do not move the person's body unless they are in immediate danger by remaining in that location. Otherwise, immobilize injuries and prepare them for transportation if necessary and safe to do so. Apply pressure to bleeding wounds until trained medical personnel arrive and are able to address the wounds themselves, or until directed by them to stop applying pressure.

Physical Shock

- Physical shock can be identified by a pallid face, cool and moist skin, shallow and irregular breathing, perspiration appearing on the individual's upper lip and forehead, increased, but faint pulse rate, nausea, and/or detached semi-conscious attitude towards what is occurring around him or her. If one or a combination of these symptoms are observed, call 911 immediately and remain with the individual, and attempting to calm them.

Electric Shock

- Electric shock can be identified by pale, bluish, clammy, and mottled skin, unconsciousness, and no indications of breathing. If one or a combination of these symptoms are observed, turn off electricity if possible, call 911 immediately, remove electric contact from the individual with non-conducting material, and call for the AED while having a CPR-certified individual perform CPR as applicable.

Burns

- Burns can be identified by a red to deep red skin color, blisters, and/or exposed flesh. If one or a combination of these symptoms are observed, cool the individual's skin immediately, free them of any jewelry or metal if it is safe to remove it, and call 911 as soon as possible. Do not pull away clothing from burned skin tissue or apply any ointment to the burn area as that may cause further damage to the wound.

Heat Stroke and Heat Exhaustion

- Heat stroke can be identified by a strong and fast pulse and/or the skin on the face appearing redder than usual and dry to the touch. If one or a combination of these symptoms are observed, rapidly cool the individual by sponging them with water, fanning them to allow evaporation to occur, and moving them into a cool environment, such as a shaded location or air-conditioned car or building.
- Heat exhaustion can be identified by an increased heart rate, fatigue, impaired cognitive ability, lack of coordination, clammy skin, weakness, and/or dizziness. Body temperature may feel normal. If one or a combination of these symptoms are observed, move them into a cool environment, such as a shaded location or air-conditioned car or building, and lay them on their back with their feet slightly elevated. If sufficient shade for on-Site workers is not safely accessible or available at the Facility Site from existing tree or structures, the construction foreman will provide additional options for shade such as temporary shade canopies.
- During a heat wave or heat spike (i.e., increase in afternoon temperature of more than 10 degrees during warm weather) the Site will be closed, and the work will need to be rescheduled or done at night. If the work can't be completed at a later date or at night the foreman will hold an emergency tailgate meeting to inform all employees of the heat conditions, emergency response procedures, and mitigation techniques (e.g., more frequent breaks, shade, increase water consumption, etc.). When ambient temperatures remain at and exceed 95 degrees Fahrenheit, the O&M Manager or his or her designee will shall discuss revisions to the work schedule (start time, end-of-shift time, multiple shifts with varying start times).
- The O&M Manager will ensure effective communication by voice, observation, or electronic means is maintained so that employees can contact a supervisor when necessary. Employees will monitor other employees for alertness and signs and symptoms of heat illness. Fellow employees will police each other to ensure their co-workers are drinking water frequently throughout the shift. New employee will be assigned a "buddy" or experienced coworker for the first 14 days of the employment.

5.0 Emergency Responder Training Drills

Training drills will be conducted with the local emergency responders at least once every calendar year. These routine drills will benefit the emergency responders by providing an opportunity for familiarization with the layout of the Site and any potential hazards associated with it, providing for quicker response times in the event of an emergency.

**Attachment B
Site Security Plan**



Highest standards



RIVERSIDE SOLAR, LLC

Matter No. 21-00752

Towns of Lyme and
Brownville
Jefferson County, NY

Site Security Plan

June 2021

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Riverside Solar, LLC

Site Security Plan

1.0 Purpose

The Riverside Solar Project is located in the Towns of Lyme and Brownville, Jefferson County, New York. The Facility Site consists of approximately 1,000 acres of land either leased or purchased from owners of private property to the north of New York State Route 12E. Most of the land within the Facility Site (prior to construction) consists of agricultural, forested, and undeveloped land use. Surrounding land uses are primarily agricultural, rural residential properties. The Village of Chaumont abuts the western boundary of the Facility Site. The largest city to the Facility Site is the City of Watertown, which is located approximately nine miles to the southeast.

The Facility consists of photovoltaic (PV) panels installed on low-profile racking systems mounted on poles driven directly into the ground. Inverters, which collect the electricity from the panels and convert it from direct current to alternating current, will be installed throughout the Facility Site. A new collection substation will take the power from the inverters and step it up to match the voltage of the electrical grid and tie in via National Grid's existing Lyme to Lyme Tap 115 kV transmission line immediately adjacent to the Facility Site. A protective fence will surround the Facility.

The Facility Site will be accessible via multiple gated entrances from NY Route 12E, Case Road, Weaver Road, and Morris Tract Road. These roads are publicly maintained and will be open to traffic throughout the construction and operation periods of the Facility.

2.0 Site Security Features

2(a) Access Controls

Facility components will be enclosed with a chain link fence during both construction and operation of the Facility. The site will be accessible to Facility personnel, including construction contractors, via multiple locked gates. Gates will be outfitted with a “Knox Box” type locking system (or similar) to allow Facility access by emergency personnel. Additional access controls are not anticipated for the Facility. Gates will not be unlocked unless AES or authorized personnel are onsite. Additionally, office trailers will remain locked during non-working hours. Details on fencing and gates is included in the Design Drawings in Appendix 5-1 of the Section 94-c Application for the Facility.

2(b) Electronic Security and Surveillance

Electronic security or surveillance facilities are not anticipated to be required during construction. All site personnel, contractors, and visitors to the site will be required to check-in at the main construction operations office or trailer in order for the Applicant to keep a record of visitors.

A security camera may be utilized at the collection substation for additional security during operation of the Facility. Surveillance monitoring will occur 24 hours a day and live monitoring will be conducted by the AES Control Center located in Salt Lake City, Utah. When unanticipated activity is detected outside of working hours, the AES Control Center will call the Facility’s operations and maintenance (O&M) manager or designee, and the local Sheriff’s department/emergency services, as necessary. Daily reports will be maintained by the AES Control Center for all site activity.

2(c) Security Lighting

The Facility will utilize manually operated exterior lighting as necessary during operation of the Facility. Security lighting will be installed only at the collection substation. The lighting will be strategically placed around the substation to emphasize worker safety during operation of the Facility. The Design Drawings in Appendix 5-1 of the Section 94-c Application detail the lighting plan and specifications. Security lighting will be maintained at the minimum levels needed to accomplish the associated task and will only be used when necessary to avoid offsite trespass. Visual disturbances will be minimized by the strategic lighting placement and limited lighting use, while providing adequate security for the Facility.

Electricity for the security lights will be provided from the station service power and from a distribution line from the local utility for emergency backup power. Full cut-off fixtures and task lighting will be used at the substation where feasible, as specified on the lighting plans in Appendix 5-1 of the Section 94-c Application. The majority of Facility construction work will be conducted during daylight hours. If additional lighting is needed for specific tasks, temporary manually operated lighting will be brought in and will only be utilized during active work periods

in specific locations. No security lighting is proposed for the Facility during non-construction work hours.

2(d) Lighting for Aircraft Safety

The Facility does not include the installation of components greater than 200 feet in height; therefore, aircraft obstruction lighting is not applicable or required, and the Facility will not compromise aircraft safety.

2(e) Cyber Security

The Application will ensure protection of digital computer and communication systems in accordance with the Federal Department of Commerce's National Institute of Standards and Technology, the North American Electric Reliability Corporation (NERC), and/or International Organization for Standardization, as applicable.

3.0 Security Risk Assessment

Construction and operation of the Facility will be typical of solar facilities of this size and type and do not include additional security risk. The AES Safety Team has identified the following potential areas of risks associated with the construction and operation of the Facility:

- Health and Safety of the employees and subcontractors onsite;
- Material and equipment delivery, storage, and installation;
- Owned, rented, or leased equipment used onsite; and
- Tools, office facilities, and other miscellaneous items used onsite.

3(a) Security Risk Mitigation Measures

To mitigate for the potential security risks outlined above, each employee, subcontractor employee, and other personnel will be required to meet the following criteria prior to being allowed unescorted access to the Facility site:

- Complete AES Environmental Health and Safety (EHS) Onboarding
- Comply with AES Covid-19 requirements

Persons, visitors, or others not completing these measures must be escorted by a designated trained employee.

Additionally, the following criteria will apply to all owned, rented or lease equipment to be used onsite during construction or operation of the:

- All equipment utilized onsite will be by qualified operators specific to the equipment being used;
- AES company fleet policy will be strictly adhered to regarding all equipment onsite;
- All equipment will be maintained in working condition and not utilized if any hazards are identified; and
- No storage of personal vehicles or equipment will be allowed on site during nights or weekends.

Tools, office facilities and other miscellaneous items to be used onsite will be utilized and maintained per AES company policy.