

APPENDIX F

Preliminary Environmental Monitoring Plan

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Environmental Monitoring Plan**

Upstate New York Power Corp

**950-A Union Road, Ste. 20
West Seneca, NY 14224-3454**

January 2009

The purpose of this Preliminary Environmental Monitoring Plan (the Plan) is to provide the Environmental Monitor(s) with a reference source to aid in managing the environmental issues that may be encountered during construction of the Hounsfield Wind Farm (the Project).

Environmental impacts during the many phases of Project construction include roads, foundations, erosion control devices, electrical lines and equipment, and erection of turbine equipment. The Plan contains the framework for the daily and long term monitoring and reporting structure to ensure that the project is completed within the environmental parameters set forth in the permits issued for the Project. The Plan is intended to be a “living” document, which will develop as the Project progresses and/or as unanticipated issues arise. The Plan is in effect from the start of construction until the completion of the construction and restoration of the Project site.

This Preliminary Plan provides the framework for the development of a full plan which will be implemented once the permits are granted for construction of the project.

Project Description

The Project is a commercial scale wind farm located on Galloo Island, in the Town of Hounsfield, Jefferson County, New York. The Project will be constructed and operated by the Upstate New York Power Corporation (Upstate Power) of West Seneca, New York.

Galloo Island is located in eastern basin of Lake Ontario near the head of the St. Lawrence River. Galloo Island is an isolated and uninhabited island, approximately 6 miles from the closest mainland shoreline (Stony Point in the Town of Henderson) and approximately 8 miles west of the Village of Sackets Harbor.

For the purposes of the Plan, the Project consists of the construction and operation of 84 wind turbine generators (WTG), capable of generating up to 252 megawatts (MW) of power at peak capacity, and related support facilities. The key Project elements more specifically include: 84 - 3.0 MW WTG having an 80 meter hub height and 90 meter blade rotor diameter; combined above ground and below ground 34.5 KV electrical collection system (ECS); an on-island electrical substation; private service roads (up to 36 feet wide); one permanent meteorological tower, 80 meters in height; and associated operation and maintenance facilities.

Organization and Reporting

The Environmental Monitor is responsible for monitoring, documenting, and reporting daily construction activities as well as managing environmental quality control and quality assurance issues. The Environmental Monitor has absolute, independent authority to order the correction of work activities in violation of any permits or commitments until such time as corrective measures have been implemented.

Permit compliance issues will be reported to Upstate Power and concurrently to the appropriate local, state, and federal agencies. Issues unrelated to permit compliance will be documented and reported to construction management for timely resolution/intervention as necessary.

Some regulatory agencies conduct a regular weekly, monthly, or quarterly compliance audit. At the request of local, state, and federal officials, compliance tours will be conducted by the Environmental Monitor.

Contact Lists

Upstate New York Power Corp Office:
 950-A Union Road, Ste. 20
 West Seneca, NY 14224-3454
 Phone: (716) 675-0751

Upstate New York Power Corp Contacts:
 Manager
 Environmental Field Engineer
 Environmental Monitor

Thomas L. Hagner
 To Be Named
 To Be Named

Local, State, and Federal Agency Contacts:

The local, state and federal agencies listed in Table X-1 will be contacted by the Environmental Monitor in the event of permit noncompliance.

Table X-1: Agency Contacts

Agency	Contact Person	Phone	Address
U.S. Army Corp of Engineers	Steve Metivier	(716) 879-4314	U.S. Army Corps of Engineers, Buffalo District 1776 Niagara St. Buffalo, NY 14207
New York State Department of Environmental Conservation Region 6	Judy Drabicki (Regional Director)	(315) 785-2513	NYSDEC 317 Washington St. Watertown, NY 13601
New York State Department of Environmental Conservation Region 6	Lawrence Ambeau (Permit Administrator)	(315) 785-2245	NYSDEC 317 Washington St. Watertown, NY 13601
New York State Department of Environmental Conservation	Stephen Tomasik (Environmental Analyst 2)	(518) 402-9167	Division of Permits NYSDEC Headquarters 625 Broadway Albany, NY 12233-1750
New York State Spill Hotline	N/A	(800) 457-7362	N/A
U.S. Fish and Wildlife Service	David Stilwell	(607) 753-9334	USFWS New York Field Office 3817 Luker Road Cortland, NY 13045
New York State Department of Agriculture and Markets	Mathew Brower (Agriculture Resource Specialist)	(518) 457-2713	New York State Department of Agriculture and Markets 10B Airline Drive Albany, NY 12235
Jefferson County Soil and Water Conservation District	Brian J. Wohnsiedler (Dist. Manager)	(315) 782-2749	Jefferson SWCD PO Box 838 21168 NYS RT 232 Watertown, NY 13601
New York State Department of Public Service	Andrew Davis	(518) 474-7080	New York State Department of Public Service Empire State Plaza Agency Building 3 Albany, NY 12223-1350

New York State Office of Parks Recreation and Historic Preservation, State Historic Preservation Office (SHPO), Field Services Bureau	Cynthia Blakemore (Archaeologist)	(518) 237-8643 ext. 3288	New York State Historic Preservation Office P. O. Box 189 Peebles Island Resource Center Waterford, NY 12188-0189
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Preconstruction Coordination

Permit Requirements

Currently, the Project is completing an Environmental Impact Statement and final state and federal permits have not been secured by Upstate Power. At a minimum, these permits include those required by USACE and NYSDEC. Upon receipt of permits, the relevant conditions pertaining to environmental issues that may be encountered during construction will be incorporated into the Plan. The complete permits, with all conditions, will be attached to this document as appendices.

Other Mitigation

Currently, a Findings Statement has not been issued by the Lead agency, The New York State Department of Environmental Conservation (NYSDEC). Once issued the relevant mitigation items and best management practices pertaining to environmental issues that may be encountered during construction will be incorporated into the Plan. At minimum, these mitigation measures will include applicable procedures outlined in the Storm Water Pollution Prevention Plan; Invasive Species Management Plan; Erosion and Sediment Control Plan, Wetland Maintenance Plan; and Spill Prevention, Control and Countermeasures Plan.

Environmental Compliance Program

General Activities

The Environmental Monitor will guarantee contractor compliance with Upstate Power’s environmental procedures and programs as well as all federal, state, and local permits. The following responsibilities are assigned to the Environmental Monitor:

- Surveillance and recording of all construction activities to ensure that all work is completed in compliance with Upstate Power’s environmental program and satisfies requirements of all federal, state, and local permits and approvals;
- Make certain that temporary and permanent stormwater and erosion controls are installed and maintained in accordance with the Project SWPPP;
- Guarantee that all construction personnel and equipment stay within the designated construction right-of-way and use only approved access roads;
- Ensure that fuel handling and equipment maintenance operations are executed away from wetlands and water bodies. Also, make sure that the contractor maintains the required spill response material as mandated by the SWPPP and Upstate Power’s spill control plan;

- Be familiar with previously identified sensitive areas, such as wetlands, where unique construction techniques will be required. Make certain that work in these areas is performed as per the specifications approved for these areas and in accordance with all federal, state, and local permit conditions;
- Ensure that all environmental mitigation and restoration plans (i.e. stream and wetland crossings, seeding, erosion control, etc.) are properly implemented in accordance with Upstate Power's specifications and in accordance with all federal, state, and local permit conditions; and
- Train construction management and crew on various aspects of the environmental compliance program.

Daily Activities

The Environmental Monitor will perform daily inspections of each construction work site with an emphasis on those sites within or immediately adjacent to environmentally sensitive areas. These activities include but are not limited to crossings of wetlands or streams and installation of SWPPP measures.

Incident Investigation

An environmental incident is defined as an unintended event with the potential for adverse environmental consequences. These incidents can range from a "close call" (no adverse affect occurred) to an accident (an adverse affect occurred). Close calls will be documented in the daily report, highlighted and circulated to construction management in order to ensure that the action does not occur in the future. In the instance of an accident, a noncompliance report will be completed and distributed to Upstate Power and concurrently to the appropriate local, state and federal agencies.

Restoration

Based on the restoration requirements specified in pending state and federal permits, a "punch list" will be created by the Environmental Monitor. Environmental Inspectors will conduct a walk over with the construction management team to ensure that restoration activities occur as required. Pending conditions stipulated in final state and federal permits, a post construction monitoring program may be required.

Project Documentation

Per regulatory requirements and standards associated with sensitive environmental issues, detailed documentation will be prepared by the Environmental Monitor. Daily inspection logs will serve as a foundation for the reporting structure. Pending conditions stipulated in final state and federal permits, the Environmental Monitor may also be responsible for preparing periodic and/or final reports for submittal to these agencies.

Upon completion of the construction and restoration of the Project site the Environmental Monitor will also be required to complete a Post Construction Report. The report will summarize the restoration measures implemented on the project site including, but not limited to:

- The documentation of the permanent storm water controls;
- Restoration within wetlands and stream crossings; and
- Documentation of any reseeded or planting that is undertaken for restoration.

The daily and monthly summaries will be used to compile this report. This report will be provided to all interested agencies including the Town, NYSDEC and USACE.