



Cassadaga Wind Project

Case No. 14-F-0490

1001.27 Exhibit 27

Socioeconomic Effects

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EXHIBIT 27 SOCIOECONOMIC EFFECTS

A Socioeconomic Report was prepared for the Facility, which is included with this Application as Appendix DDD. The Facility is located in rural Chautauqua County, and information regarding population, educational attainment and race within the Towns of Charlotte, Cherry Creek, Arkwright, and Stockton is summarized as follows:

Table 27-1. Overview of Demographics within Study Area

Demographic Information	Charlotte	Cherry Creek	Arkwright	Stockton
<i>Population</i>				
2010 Total Population [1]	1,729	1,118	1,061	2,248
2013 ACS 5-Year Population Estimate	1,837	1,086	988	2,350
Median Age	38.1 yrs	40.4 yrs	49.3 yrs	39.8 yrs
<i>Educational attainment</i>				
% high school graduate or higher	85.4%	84.2%	87.6%	83.9%
Total housing units	798	503	534	1,093
Median household income	\$45,372	\$45,972	\$64,167	\$46,806
Foreign born population	2	11	20	23
Individuals below poverty level	11.8%	13.2%	12.0%	19.7%
Veterans	128	79	85	210
<i>Race and Hispanic Origin</i>				
White alone	1,816	1,045	960	2,347
Black or African American alone	0	11	2	0
American Indian and Alaska Native alone	7	0	0	0
Asian alone	2	2	9	0
Native Hawaiian & Other Pacific Islander	0	0	0	0
Some Other Race alone	6	2	3	0
Two or More Races	6	26	14	3
Hispanic or Latino (of any race)	20	14	17	8
White alone, Not Hispanic or Latino	1,804	1,033	946	2,339

¹ Demographic profile of 2010 US Census. All other data is from the 2009-2013 American Community Survey 5- Year Estimates

Quantifying the economic impacts of the Facility is essential to understanding the potential benefits for the local economy. Wind power development, like other commercial development projects, can expand the local economy through both direct and indirect means. Income generated from direct employment during the construction and operation phases is subsequently used to purchase local goods and services, creating a ripple effect throughout the local economy. The socioeconomic report analyzes three levels of impact that the proposed Facility may have on the economy:

- On-site labor impacts:** These are the direct impacts experienced by the companies engaged in the construction and operation of the Facility. This value estimates the dollars spent on labor and professional services by project developers, consultants, and construction contractors, as well as and operation and maintenance (O&M) personnel. On-site labor impacts do not reflect material expenditures.

- **Local revenue and supply chain impacts:** These impacts measure the estimated increase in demand for goods and services in industry sectors that supply or otherwise support the companies engaged in construction and operation (also known as “backward-linked” industries). Indirect measures account for the demand for goods and services such as turbine components, project analysis, legal services, financing, insurance, etc.
- **Induced impacts:** Induced impacts measure the estimated effect of increased household income resulting from the project. Induced impacts reflect the reinvestment of earned wages, as measured throughout the first two levels of economic impact. This reinvestment can occur anywhere within the economy, on household goods, entertainment, food, clothing, transportation, etc.

Each of these three categories can be measured in terms of three indicators: jobs (as expressed through the increase in employment demand), the amount of money earned through those jobs, and the overall economic output associated with each level of economic impact. These indicators are described in further detail below:

- **Jobs:** Jobs refer to the increase in employment demand as a result of facility development. These positions are measured across each level of impact, so that they capture the estimated number of jobs on site, in supporting industries, and in the businesses that benefit from household spending. For the purposes of this analysis, this term refers to the total number of year-long full-time equivalent (FTE) positions created by the development. Persons employed for less than full time or less than a full year are included in this total, each representing a fraction of a FTE position (e.g. a half-time, year-round position is 0.5 FTE).
- **Earnings:** This measures the wages earned by the employees described above.
- **Output:** Output refers to the value of industry production in the state or local economy, across all appropriate sectors, associated with each level of impact. For the manufacturing sector, output is calculated by total sales plus or minus changes in inventory. For the retail sector, output is equal to gross profit margin. For the service sector, it is equal to sales volume.

To quantify the local economic impacts of constructing and operating the Facility, the Job and Economic Development Impact (JEDI) model was used, which was created by the National Renewable Energy Laboratory (NREL), a facility of the United States Department of Energy. The JEDI model requires project-specific data input (such as year of construction, size of project, turbine size and location), and then calculates the impacts described above through the use of state-specific multipliers. These multipliers account for the change in jobs, earnings, and output likely to occur throughout the local, regional, and statewide economy as a result of Facility-related expenditures. The resulting data are paired with industry standard values (e.g., wage rates) and data reflecting personal spending patterns (e.g., percent

of household income dedicated to housing expenditures) to calculate on-site, supply chain, and induced impacts. This model allows impacts to be estimated for both the construction and operation phases of the proposed development.

An economic impact analysis was performed for a commercial wind farm (the Facility) to be constructed and go into operation in 2018 with a rated capacity of 126 MW with 58 turbines sized at 2,172 kW. The results of this analysis are illustrated in Table 27-2 below, and summarized in the narrative that follows. The results shown in Table 27-2 describe the potential impact of the Facility on industries throughout the state, including the on-site labor impacts that occur specifically within the local economy.

Table 27-2. Economic Impact Analysis

	Jobs	Earnings (Millions)	Output (Millions)
Construction			
Project Development and Onsite Labor Total	75	\$6.1	\$6.6
Construction & Interconnection Labor	5	\$0.7	-
Construction Related Services	70	\$5.4	-
Turbine & Supply Chain Impacts	239	\$19.9	\$48.5
Induced Impacts	128	\$10.4	\$24.5
Total Impacts	442	\$36.4	\$79.6
Annual Operation			
Onsite Labor Impacts	7	\$0.6	\$0.6
Local Revenue and Supply Chain Impacts	6	\$0.6	\$2.5
Induced Impacts	6	\$0.5	\$1.2
Total Impacts	19	\$1.7	\$4.3

Source: Jobs and Economic Development Impact Model (USDOE NREL, 2015)

Note: Totals may not add up due to independent rounding. Project Development and Onsite Labor Total represents the Construction and Interconnection Labor plus the Construction Related Services. The JEDI model only provides the output for this total, and not for these individual components.

(a) Construction Workforce

The JEDI model resulted in an estimated construction workforce of 75 total FTE positions (“jobs”) associated with the Facility. Of these, 70 of the jobs will occur in the Construction Labor, while five of the jobs includes the disciplines of engineers and other professional services. This workforce has been further evaluated by the Applicant’s construction management team to provide the following estimate of the average work force, by discipline, for each quarter during construction, and is summarized in the following table (Table 27-3).

Table 27-3. Quarterly Labor Averages

Annual Quarter	Construction Labor Quarterly Average FTE Jobs	Engineers and Other Professional Services Quarterly Average FTE Jobs
Q1 (Jan-Mar)	10.0	1.0
Q2 (Apr-Jun)	46.7	3.0
Q3 (Jul-Sep)	61.7	4.0
Q4 (Oct-Dec)	15.0	1.3

(b) Construction Payroll

The JEDI model resulted in a total output of \$36.4 million for annual construction payroll of the 70 jobs listed in Part A and \$200.1 million for non-payroll expenditures associated with the Project. Non-payroll construction expenditures listed in the JEDI model include equipment (turbines, blades, towers, and transportation), balance of plant materials (construction, transformer, electrical, HV line extension), materials for the development of the HV sub/interconnection, and site certificate expenditures. These estimates of the annual construction payroll by trade are listed in Table 27-4.

Table 27-4. Annual Construction Payroll by Trade (in \$ Millions)

Trade	Direct Impacts	Indirect Impacts	Induced Impacts
Agriculture	\$0.00	\$0.00	\$0.000
Mining	\$0.00	\$0.00	\$0.000
Construction	\$5.40	\$15.42	\$4.513
Manufacturing	\$0.00	\$0.58	\$0.330
Fabricated Metals	\$0.00	\$0.00	\$0.000
Machinery	\$0.00	\$0.00	\$0.000
Electrical Equipment	\$0.00	\$0.00	\$0.000
Transport., Communication & Utilities	\$0.00	\$0.00	\$0.000
Wholesale Trade	\$0.00	\$0.00	\$0.000
Retail Trade	\$0.00	\$0.22	\$0.313
Fire	\$0.00	\$0.00	\$0.000
Misc. Services	\$0.00	\$0.28	\$0.339
Government	\$0.00	\$0.58	\$3.576
Engineering & Professional Services.	\$0.70	\$0.85	\$0.00
Other Sectors (Not Construction)	\$0.00	\$2.06	\$0.00
Total	\$6.1	\$19.9	\$10.4

(c) Secondary Employment and Economic Activity Generated by Facility Construction

The JEDI model resulted in an estimated secondary employment output of 239 jobs in turbine and supply chain impacts during the construction period and 128 jobs from induced impacts during the construction period. JEDI model default data and 2018 inflation adjustments were used as economic multiplier factors. No customized economic multiplier factors were used.

JEDI models utilize economic data (multipliers and consumption patterns) derived from the Minnesota IMPLAN Group (MIG) state-level data to estimate the local economic activity and the resulting impact from new energy generation plants. MIG compiles and aggregates national and regional economic and demographic data to calculate inter-industry linkages and the relationships between changes in demand for goods and services, and the associated economic activity at the local, state and regional levels. State multipliers for employment, wage and salary, and output and personal spending patterns are derived from the MIG accounting software using currently available data. Changes in spending patterns brought about by investments in power plants, fuel production facilities, or other projects are matched with appropriate industry multipliers. If the year for which the expenditures (dollars) are entered does not match the model's multiplier data year, the JEDI model applies price deflators to account for changes in actual dollar value. The summary results are then converted back to the original dollar year entered by the user. For additional information on the JEDI model please see <http://www.nrel.gov/analysis/jedi/methodology.html>.

(d) Workforce, Payroll, and Expenditures during Facility Operation

Based upon JEDI model computations¹, the operation and maintenance of the proposed Project is estimated to generate seven full full-time jobs with combined estimated annual earnings of approximately \$600,000. These positions are estimated by the JEDI model output to include 5 positions as Field Technicians, 1 Administrative/Secretarial position and 1 position in Site Management. Projected wage rates are anticipated to consistent with statewide averages, and are estimated to range from \$19 to \$30 per hour for administrative and technical personnel, to around \$48 per hour for site management.

¹ Note: Impact subtotals (as shown in Table 11) are independently rounded, therefore may not add up directly to the totals shown. For example, the JEDI model for this Project estimates 7.08, 6.01, and 5.97 FTE jobs during the operational phase of the Project (equal to 19.06 positions, which is the rounded figure as shown). Because the model estimates whole full-time positions only, these appear in the summary table as 7, 6, and 6 positions.

Expenditures likely to be made in the vicinity of the Project during operation are estimated at \$2.4 million annually, which includes local spending for direct operating and maintenance and other forms of local spending including debt and equity payments, property taxes and land leases. Table 27-5 highlights these operational expenditures.

Table 27-5. Total Annual Operational Expenses

	Local	Non-Local	Total Direct and Other Annual Costs
Direct O&M Costs	\$934,125	\$1,702,754	\$2,636,879
Other Annual Costs	\$1,449,329	\$33,936,355	\$35,385,684
Debt and Equity Payments	\$0		
Property Taxes	\$954,450		
Land Lease	\$378,000		
Total Spending	\$2,383,454	\$35,639,109	\$38,022,563

Source: Jobs and Economic Development Impact Model (USDOE NREL, 2015)

The Project operation will result in payment to local landowners in association with the lease agreements executed to host Project components, and these annual lease and easement payments will offer direct benefits to participating landowners, which will be in addition to any income generated from the existing land use (e.g. agricultural production). As indicated above the JEDI model has calculated these payments at \$378,000 annually. However, based on the specifics of the lease and easement agreements, the Applicant estimates that these payments will total approximately \$1.2 million during the first year (construction), and approximately \$950,000 on an annual basis each year the Facility is in operation. These lease payments will have a positive impact on the region, to the extent that landowners will spend their revenue locally.

(e) Secondary Employment and Economic Activity Generated by Facility Operation

The estimated number of secondary employment and economic activity associated with the Project operation, as estimated by the JEDI model, is 12 jobs with earnings of approximately \$1.1 million annually, and an economic output of \$3.7 million annually. These jobs are created from Local Revenue and Supply Chain Impacts and Induced Impacts.

(f) Incremental School District Operating and Infrastructure Costs

The Project is not expected to result in any additional operating or infrastructure costs to the local school districts, which include Pine Valley and Cassadaga Valley Central School Districts. The Cassadaga Wind Project may place

limited (if any) demand on district services. For example, some of the wind farm employees may have school-aged children. This may cause a marginal increase in school district services and expenditures; however, it is assumed that such expenditures can be recovered through those employees' property tax payments and the respective district's state aid.

(g) Incremental Municipal, Public Authority, or Utility Operating and Infrastructure Costs

The Project is not expected to result in any additional operating or infrastructure costs to local municipalities, authorities, or utilities. The Cassadaga Wind Project may place limited (if any) demand on municipal and school district services, however this demand will be recovered through fees and payments. For example, if employees live in the municipalities, their required services will be paid for through property taxes and utility fees.

(h) Jurisdictions that Will Collect Taxes or Benefits

The Project is anticipated to result in economic benefits for the following jurisdictions:

- Chautauqua County
- Town of Cherry Creek
- Town of Charlotte
- Town of Arkwright
- Town of Stockton
- Cassadaga Valley Central School District
- Pine Valley Central School District

(i) Incremental Amount of Annual Taxes or Payments

Applicant expects to execute a payment in lieu of taxes (PILOT) Agreement, which will require annual PILOT payments for the next 20 years to local tax jurisdictions. While the specific terms of the PILOT agreement have not yet been negotiated, the PILOT payments will increase the revenues of the local taxing jurisdictions, and will represent a significant portion of their total tax levy.

Similar to other wind projects in New York State, the Applicant plans to enter into a PILOT with an annual payment of \$4,000 per megawatt installed during the term of the PILOT. At this rate, during the term of the PILOT, the average annual PILOT payment would total \$504,000 per year, accumulating up to \$10.1 million (in 2014 dollars) over 20 years.

Additionally, pending the final PILOT agreement, the applicant will also enter into a Host Community Agreement (HCA) for an additional fee per MW.

This annual revenue stream will be distributed among the relevant taxing jurisdictions according to their share as determined by the local combined tax rates and pursuant to the terms of the PILOT Agreement. Table 27-6 summarizes the projected annual PILOT payments based on the average distribution of property taxes. Municipalities include the Towns of Cherry Creek, Charlotte, Arkwright and Stockton. Schools Districts include Pine Valley and Cassadaga Valley Central School Districts. Within the Study Area in 2014, municipal property taxes constituted an average of 22% of each property's total tax obligation. Property taxes constituted an average of 27%, and school taxes claimed the remaining 51%.

Table 27-6. Potential Annual and Total PILOT Payments*

Annual PILOT payment	Average annual distribution			20-yr total PILOT payment	Average total distribution		
	Municipalities	County	School Districts		Municipalities	County	School Districts
\$504,000	\$110,550	\$135,864	\$257,586	\$10,080,000	\$2,210,995	\$2,717,289	\$5,151,716

* Distribution of property taxes based on average distribution as determined published 2014 tax rates (NYSORPTS, 2014). Payment amounts based on 126 MW facility, with a base payment of \$4,000 per MW installed.

Over the 20-year PILOT Agreement, approximately \$10.1 million will be provided to the local taxing jurisdictions (in 2014 dollars). In light of this revenue stream, the Project will have a beneficial impact on municipal budgets and is expected to offset any indirect costs to the local municipalities. Upon expiration of the PILOT Agreement, tax payments will be dependent upon the depreciation of the project's generating assets and the appraised value of the project at that time.

(j) Comparison of Incremental Costs and Incremental Benefits

As indicated above, the Project is not expected to result in any additional costs to local tax jurisdictions, but will result in significant benefit through implementation of a PILOT agreement.

(k) Equipment or Training Deficiencies in Local Emergency Response Capacity

Exhibit 18, along with the Preliminary Health and Safety Plan and Emergency Action Plan, provide specific details on the emergency equipment that the Applicant will keep on site in order to respond to a fire or medical emergency. These documents also contain fire and emergency responder training and communication plans in order to address any

training deficiencies. The final Safety Plan/EAP will contain a list of the equipment that the Applicant will have on site for a fire or medical emergency.

The local emergency responders are not expected to have specialized equipment beyond the typical first aid, medical emergency and fire vehicles and equipment that would normally be at local fire and emergency departments for responses to fires, hazardous substance exposure, or medical emergencies. For example, fire and emergency responders are not expected to have the necessary equipment to bring injured personnel down from the tower to ground level, but after undergoing certification, individual local First Responders may be trained to use equipment located on site to conduct High Tower Rescues. Emergency responders will not have direct access to turbines through access roads due to security and landowner preference reasons. However, anytime that the Facility operators and maintenance personnel are at a turbine site, the access road gates will remain unlocked. More information can be found in the Preliminary Health and Safety Plan and the Emergency Action Plan.

The Site Supervisor (SS), who reports to the Plant Operator, has authority to direct response operations, and assumes control over on-site activities. They are also responsible for notifying, when necessary, local public emergency officials. In terms of risk and hazard analysis, a Job Safety Analysis, according to Cassadaga Wind policy, will be completed, at minimum, daily for each task by the site supervisor or foreman responsible for the task(s). As work changes can happen at any time, these JSAs may be necessary to be modified more than once a day per task.

Local first responders (i.e. Town fire departments, Chautauqua County Emergency Services Department) will be provided with a copy of the final EAP. Annual drills and training will be held for local first responders and the final EAP will include a list of all fire and emergency medical equipment that will be maintained at the Facility. The specifics of the annual drill activities and training will be decided by the Plant Operators and local first responders. Only personnel who have been certified in High Tower Rescue procedures (or equivalent) may perform rescues at levels above the ground or base level in wind turbines.

(l) Consistency with State Smart Growth Public Infrastructure Criteria

The New York State Smart Growth Public Infrastructure Policy Act is meant to maximize the social, economic, and environmental benefits from public infrastructure development by minimizing the impacts associated with unnecessary sprawl. State infrastructure agencies, such as the NYSDOT, shall not approve, undertake, or finance a public infrastructure project, unless, to the extent practicable, the project is consistent with the smart growth criteria set forth in ECL § 6-0107.

Although the Project will not result in the construction or operation of public infrastructure and will not result in unnecessary sprawl, approvals from the NYSDOT may be required due to Project components crossing state highways (e.g., State Route 60). Therefore, this section provides a detailed statement regarding the Project's consistency with smart growth criteria. As discussed below, the Project is consistent with five of the ten criteria, while the remaining five criteria do not apply to the Project.

1) Criterion 1: To advance projects for the use, maintenance, or improvement of existing infrastructure

The purpose of the Facility is to create an economically viable wind-powered electrical-generating facility that will provide a source renewable energy to the New York State grid, and in doing so, improve the existing energy infrastructure. The Project components include 58 wind turbines and their associated access roads, electrical gathering lines, overhead generator lead line, permanent meteorological towers, operations and management building, staging area, collection station and substation. While these project components are not public infrastructure and are generally not expected to result in the operation of public infrastructure, the project will contribute 126 MW of renewable energy to the New York State grid. As reported by the Preliminary Scoping Statement (September 2015), total net generation delivered to National Grid's existing 115 kV line is expected to be approximately 397 GWh², or enough electricity to meet the average annual consumption of between approximately 36,422 and 55,915 households, based on average annual electric consumption of 10.9 MWh for the U.S. and 7.1 MWh for New York State, respectively.

Additionally, the Facility will use portions of existing State highway infrastructure through equipment transportation. However, none of these activities are anticipated to have any long-term impact on existing infrastructure.

After consideration of its contribution to and utilization of both the NYS Power Grid and transportation routes identified above, it has been determined the Facility is consistent with this Smart Growth criterion. Consequently, the necessary changes to the public infrastructure (contribution of renewable energy to NYS Power Grid, utilization of existing transportation routes and construction of access road intersections to existing roads) are also consistent with the criterion.

2) Criterion 2: To advance projects located in municipal centers

² Assumes a 36% capacity factor

"Municipal centers" are defined in the Smart Growth statute as "areas of concentrated and mixed land uses that serve as centers for various activities, including, but not limited to, central business districts, main streets, downtown areas, brownfield opportunity areas, downtown areas of local waterfront revitalization program areas, transit-oriented development, environmental justice areas, and hardship areas," as well as "areas adjacent to municipal centers, which have clearly defined borders, are designated for concentrated development in the future in a municipal or regional comprehensive plan, and exhibit strong land use, transportation, infrastructure and economic connections to a municipal center; and areas designated in a municipal or comprehensive plan, and appropriately zoned in a municipal zoning ordinance, as a future municipal center." The Facility is not within a municipal center nor is it near a municipal center. The Project site is also not planned as a municipal center. Therefore, this criterion does not apply to this Project.

- 3) Criterion 3: To advance projects in developed areas or areas designated for concentrated infill development in a municipally approved comprehensive land use plan, local waterfront revitalization plan and/or brownfield opportunity area plan

The Facility is not located within an area designated for concentrated infill development plan, local waterfront revitalization plan, and/or brownfield opportunity area plan. The Project is on land encompassed by rural residential and agricultural areas, which are not suitable for concentrated infill development or brownfield redevelopment and is not within a designated Coastal Zone. Therefore, this criteria does not apply to the Project.

- 4) Criterion 4: To protect, preserve and enhance the state's resources, including agricultural land, forests, surface and groundwater, air quality, recreation and open space, scenic areas, and significant historic and archaeological resources

Exhibits 17, 20, 22, 23, and 24, and their associated stand-alone studies, provide detailed analyses of the potential for environmental impacts and benefits, including analyses specifically associated with agricultural land, forests, surface and groundwater, air quality, recreation and open space, scenic areas, and significant historic and archaeological resources. Based on these analyses, the Applicant believes that the Project has avoided and minimized impacts to these resources to the maximum extent practicable (based on the layout as currently proposed), and any remaining impacts are outweighed by the benefit provided by the Project's generation of up to 126 MW of clean, renewable energy. Therefore, the Project is consistent with this criterion.

- 5) Criterion 5: To foster mixed land uses and compact development; downtown revitalization; brownfield redevelopment; the enhancement of beauty in public spaces; the diversity and affordability of housing in proximity to places of employment, recreation, and commercial development; and the integration of all income and age groups.

The Facility is proposed to be located in the rural hills of Chautauqua, well removed from any areas that would potentially experience compact development, downtown revitalization, diversity and affordability of housing, etc. (e.g., villages and cities). Therefore, this criterion is not applicable.

- 6) Criterion 6: To provide mobility through transportation choices including improved public transportation and reduced automobile dependency

The Facility is not a public infrastructure action, and therefore this criterion is not applicable.

- 7) Criterion 7: To coordinate between state and local government and inter-municipal and regional planning

The Applicant has conducted extensive public outreach to local government and planning agencies throughout the development and review of the Project. This has included the public outreach conducted in accordance with the requirements of the Article 10 process and the Public Involvement Program (PIP) plan prepared specifically for the Facility, which includes frequent stakeholder consultation and other forms of engagement, public education, public meetings, ample notification periods, and public comment periods at key milestones. To the extent applicable, these outreach efforts and municipal/agency consultations satisfy the criterion related to participation in community based planning and collaboration (please see Exhibit 2 for additional information on public outreach).

- 8) Criterion 8: To participate in community based planning and collaboration

The Applicant team has conducted and will continue to conduct extensive public outreach to community-based organizations throughout the development and review of the Facility. This has included the public outreach conducted in accordance with the requirements of the PIP, which includes frequent stakeholder consultation and other forms of engagement, public education, public meetings, ample notification periods, and public comment periods at key milestones. See Criterion 7 for additional detail. These outreach efforts satisfy the criterion related to participation in community based planning and collaboration.

9) Criterion 9: To ensure predictability in building and land use codes

The Applicant has no role in or jurisdiction over the development or enforcement of building or land use codes in the Towns of Arkwright, Charlotte, Cherry Creek and Stockton. Therefore, this criterion does not apply to this Facility.

10) Criterion 10: To promote sustainability by strengthening existing and creating new communities which reduce greenhouse gas emissions and do not compromise the needs of future generations, by among other means encouraging broad based public involvement in developing and implementing a community plan and ensuring the governance structure is adequate to sustain its implementation

The Facility is consistent with State policies designed to encourage the development of renewable energy projects, fight climate change, and contribute to the transition of New York's energy markets. Electricity generated from zero-emission wind energy can displace the electricity generated from conventional power plants, thereby reducing the emissions of conventional air pollutants, such as methane and carbon dioxide (which are both linked to global climate change). Thus, this Project promotes the reduction of greenhouse gas emissions through the use of renewable energy. The Project does, therefore, support this Smart Growth criterion.

11) Smart Growth Attestation

The Smart Growth Act requires that the chief executive officer (or his or her designee) attest that a given project meets the relevant Smart Growth Criteria, or shall justify non-compliance as impracticable. However, this does not apply to the Facility.