NORTH SENECA
SOLAR PROJECT

ORES Permit Application No. 23-00036

1100-2.19 Exhibit 18 Socioeconomic Effects

REDACTED

REVISION 1

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EXHIBIT 18 SOCIOECONOMIC EFFECTS

North Seneca Solar Project, LLC (the Applicant), is proposing to construct and operate the North Seneca Solar Project, an up to 90-megawatt solar energy generating facility in the Towns of Junius and Waterloo, Seneca County, New York (the Facility). On behalf of the Applicant, Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services D.P.C (EDR) has prepared this report describing the potential socioeconomic impacts of the Facility and the current socioeconomic conditions of the area.

Over the past 20 years, renewable energy production has increased by approximately 89% nationwide. Energy employment trends generally reflect these changes in energy production. More specifically, solar power generation employment increased by approximately 45,200 jobs nationwide between 2015 and 2019, resulting in a growth rate of approximately 15% (NASEO, 2020). In 2020, the energy sector was impacted by the COVID-19 pandemic and subsequent economic fallout; however, by the end of 2020 the energy sector began to rebound. Electric power generation jobs grew 2.9%, adding approximately 24,006 jobs in 2021, resulting in an estimated total of 857,579 electric power generation jobs in the United States in 2021. Construction jobs account for 52% of nationwide solar employment, followed by professional services at 16% and manufacturing at 13% (United States Department of Energy [DOE], 2022a). Within New York, the electric power generation sector employed 38,866 workers in 2021, an increase of approximately 1,022 jobs from the year prior. Solar made up the largest segment of electric power generation employment in 2021, with approximately 13,400 New York employees (DOE, 2022b).

Solar is anticipated to be one of New York State's fastest-growing energy sectors. The Just Transition Working Group (JTWG) *March 2023: Vintage Update of the 2021 Jobs Study*[1] estimates that the solar energy sector will add approximately 24,443 to 26,463 jobs in New York State by 2050. The construction industry is anticipated to add the greatest number of jobs, with an additional 12,888 to 13,980 jobs in New York State by 2050. By 2050, professional services, manufacturing, and other supply chain industries are projected to add approximately 1,751 jobs, 451 jobs, and 3,725 jobs, respectively (JTWG, 2023). Solar projects like the proposed Facility will create jobs in each of these sectors and, in doing so, play a key role in advancing New York State's growing green economy.

The proposed Facility is anticipated to have a positive economic impact statewide and on the host communities. Utility-scale solar energy development, like other commercial development projects, can support a wide range of socioeconomic benefits including job creation, purchases of local materials and services, and direct revenue to local municipalities in the form of Payment in Lieu of Taxes (PILOT) agreements and Host Community Agreements (HCAs). Additionally, income earned by those employed in association with the construction and operation of the Facility can be used to purchase community goods and services, recirculating through the local economy. This Exhibit presents a socioeconomic profile of the host communities and assesses the potential socioeconomic impacts of the proposed

[1] The 2021 JTWG Jobs Study was required by New York State's Climate Leadership and Community Protection Act (CLCPA). The JTWG released a March 2023: Vintage Update this year. The Jobs Study and supporting research were done on behalf of the JTWG as part of the New York State Climate Action Council.

Facility. Socioeconomic effects reported in this Exhibit include direct employment estimates as well as estimates of the incremental costs and benefits to the host communities resulting from the construction and operation of the Facility.

Socioeconomic Profile

Seneca County straddles Western and Central New York between the cities of Rochester and Syracuse. The towns of Junius and Waterloo are in the northern portion of the county. The towns are primarily rural communities, with the Town of Junius making up 3.5% of the population in Seneca County and the Town of Waterloo (incl. the Village of Waterloo) making up 21.7% of the county population. The towns of Junius and Waterloo have undergone slight declines in population since 2000. Both towns and Seneca County have significantly lower median housing values and median household income than the statewide values. Meanwhile, the unemployment rate is lower in both towns and Seneca County than in New York State. Additional population, educational attainment, and economic conditions within Seneca County and the towns of Junius and Waterloo are summarized in Table 18-1 and Appendix 18-A.

Table 18- 1. Demographic Information

	Town of Junius	Town of Waterloo	Seneca County	New York State
Population				
2021 Population	1,192	7,348	33,900	20,114,745
% Annual Change (2000-2021)	-0.6%	-0.3%	+0.1%	+0.3%
% of population ages 15-64	58.8%	67.3%	64.3%	66.2%
Educational Attainment				
% High school graduate or higher	80.5%	90.1%	84.7%	87.4%
% Bachelor's degree or higher	12.1%	21.0%	21.5%	38.1%
Economic Conditions				
Median Housing Value	$114,200	$92,000	$111,800	$340,600
Median household income	$65,500	$59,415	$59,086	$75,157
Individuals below the poverty level	13.6%	11.3%	11.9%	13.5%
Labor Force Characteristics				
Unemployment Rate	0.2%	5.9%	3.7%	6.2%
Labor Force Participation	59.0%	62.4%	57.1%	63.1%

Source: 2017-2021 American Community Survey 5-Year Estimates, Decennial census, Tables S0101, P001, S1501, DP04, S1701, S2503, and DP03.

Compared to New York State, Seneca County has a strong manufacturing sector which represents approximately 14% of all employment in the county. Construction is another strong employment sector in the county, representing approximately 5% of all jobs. Development of the North Seneca Solar Project is primarily anticipated to impact the construction sector in Seneca County. Although not captured by total employment numbers, agriculture is also an important employment sector in the county when considering the land area dedicated to agriculture. According to the 2017 USDA Census of Agriculture, Seneca County has 118,545 acres of farmland with the average farm size being 230 acres and average net cash farm income

of operations being $73,469 (USDA Census of Agriculture, 2017). Solar energy projects are generally compatible with agricultural land use by offering landowners financial compensation for an alternative use of the land that will ultimately reduce the extent of soil disturbance and allow the soil to lie fallow during the life of the Facility. A more detailed analysis of the County's economy, including agricultural statistics, is provided in Appendix 18-A.

Understanding the fiscal health of communities in which a project will be located is essential to assessing the potential economic impacts or benefits of that project. The general fiscal profile for any municipality includes its revenues, expenditures, and long-term debt obligations. Most of the revenue collected is through real property taxes, sales taxes, and state aid. Municipalities (towns, villages, and counties) and school districts, as independent taxing jurisdictions, are responsible for providing specific services and facilities to those who live and work within their boundaries and for levying the taxes needed to pay for those services and facilities. To support the assessment of potential economic impacts of the Facility, local property tax rates and tax levies for the taxing jurisdictions in which the Facility is proposed to be located were reviewed. The relevant taxing jurisdictions are Seneca County, the Town of Junius, Town of Waterloo, and Waterloo Central School District.

Annual municipal expenditures are recovered in large part through each municipality's tax levy, which is borne by taxable properties. Real property taxes are determined by each property's assessed value, multiplied by the tax rate established by each taxing jurisdiction. Table 18-2 summarizes the most recent data available for municipal and county property tax levies and rates in the host communities.

Table 18- 2. Property Tax Levy and Municipal Tax Rate[2]

	Levy year 2021 (roll year 2020)			Levy year 2022 (roll year 2021)		
	Property Tax Levy	Tax Rate per $1000 Assessed Value	Eq. Rate	Property Tax Levy	Tax Rate per $1000 Assessed Value	Eq. Rate
Seneca County	$10,301,325	4.18	83.25	$10,319,094	4.08	75.48
Town of Waterloo	$1,105,149	3.31	88.00	$1,124,461	3.25	79.00
Town of Junius	$665,421	5.81	100.00	$694,871	5.97	97.00

Source: New York State Office of Real Property Tax Services, 2021-2022

Another significant source of revenue for host communities is local sales tax. The current sales tax rate for Seneca County is 8% (4% local tax plus 4% state tax) (New York State Department of Taxation and Finance, 2022). In 2021, the total sales tax revenue for the county was $30,749,019 (New York State Comptroller, 2021).

[2] Property tax levy reflects the amount of revenue required to be collected by the municipality through the property tax base and is equal to total municipal spending minus aid and other revenues. The tax base is equal to the sum of taxable parcel values. The municipal tax rate is determined by dividing the levy by the tax base, such that each taxable parcel produces that amount of property tax per $1,000 assessed value. An equalization rate is the state's measurement of a municipality's level of assessment. An equalization rate of 100 means that the municipality is assessing property at 100 percent of market value. An equalization rate lower than 100 means that the municipality's total market value is greater than its assessed value.

An overview of the balance of a municipality's revenues, expenditures, and debt reveals its general fiscal health. As illustrated in Table 18-3, from 2021 to 2022, the revenues and expenditures in Seneca County and the Town of Junius increased while debt decreased. In the Town of Waterloo, revenues, expenditures, and debt decreased.

Table 18- 3. Municipal Budgets

	2021	2022
	Seneca County	
Total Revenues & other sources	$93,888,927	$98,275,135
Total Expenditures & other uses	$86,062,787	$93.541,821
Total Debt	$25,272,872	$23,893,645
	Town of Waterloo	
Total Revenues & other sources	$5,230,390	$3,612,038
Total Expenditures & other uses	$5,200,697	$3,489,831
Total Debt	$2,251,969	$2,132,829
	Town of Junius	
Total Revenues & other sources	$1,354,360	$2,087,000
Total Expenditures & other uses	$1,247,554	$1,313,019
Total Debt	$1,187,353	$997,200

Source: New York State Comptroller, 2022, (x= no data available), Tables FX51, H51, FX910, and FX48.

School districts in New York are subject to a separate budgeting process. The Facility is located entirely within the Waterloo Central School District. The budget for the school district is shown in Table 18-4. From 2021 to 2022, the Waterloo Central School District increased revenues and expenditures, but decreased debt (New York State Comptroller, 2022).

Table 18- 4. School District Budget

	2021	2022
	Waterloo Central School District	
Total Revenues & other sources	$51,014,479	$60,920,120
Total Expenditures & other uses	$49,642,495	$54,445,127
Total Debt	$24,765,000	$19,645,000

Source: New York State Comptroller, 2022, Tables W411 and AM411.

In the face of budget shortfalls and a statewide property tax cap, municipalities may find it advantageous to maximize other, less traditional, forms of revenue. As described in Section (j) solar projects provide direct benefits to local taxing jurisdictions through PILOT agreements and HCAs. An initial analysis of potential revenue generated through a PILOT agreement is included in Appendix 18-A.

In addition to benefits from PILOT agreements and HCAs, solar projects such as the proposed Facility generally have other economic benefits. Solar power development, like other commercial development projects, can expand the local, regional, and statewide economies through both direct and indirect means.

(a) Construction Workforce

On behalf of the Applicant, Strategic Economic Research, LLC evaluated the socioeconomic effects of the Facility. The results of the analysis are summarized in the Economic Impact and Land Use Analysis (Appendix 18-A). The employment and economic impacts of the Facility were assessed using the IMPLAN (IMpact analysis for PLANning) modeling tool, a widely-used and widely-accepted general input-output modeling software and data system that tracks each unique industry group in every level of the regional data (IMPLAN Group 2020). This tool allows users to estimate jobs, earnings, and economic output using facility-specific data from the Applicant and geographically defined multipliers. The Applicant provided detailed project cost estimates and percent share estimates for project materials and labor. The most currently available IMPLAN multipliers (2021) for Seneca County and New York at the time of the analysis were used.

The analysis quantifies the socioeconomic impacts from onsite labor and other project expenditures that the proposed Facility may have on the statewide economy and within the host communities. Onsite labor impacts are the direct impacts experienced by the companies/individuals residing in New York State engaged in the onsite construction and operation of the Facility. These values represent the expenditure of dollars on labor (wages, salaries, and associated expenses) of onsite construction personnel and operations personnel. Furthermore, onsite labor impacts can be measured in terms of jobs (as expressed through the increase in employment demand) and the amount of money earned through those jobs (measured by the wages and salary compensation paid to employees). For this analysis, the term "jobs" refers to the total number of year-long full-time equivalent (FTE) positions created by the Facility, assuming a 40-hour work week for 52 weeks of the year. Persons employed for less than full-time or less than a full year are included in this total, each representing a fraction of an FTE position (e.g., a half-time, year-round position is 0.5 FTE).

The Economic Impact and Land Use Analysis (Appendix 18-A) indicates construction of the proposed Facility is estimated to generate approximately 151 FTE jobs for New York residents, 44 of which are the estimated FTE jobs for Seneca County residents. A detailed breakdown of the anticipated total FTE jobs for New York is provided in Table 18-5. The results are tabulated by two-digit North American Industry Classification System (NAICS) industry sector divisions. These estimated jobs impacts have been verified as reasonable by the Applicant based on technical expertise and the Applicant's experience developing other solar facilities.

Table 18- 5. Total Employment Estimates during Construction

NAICS 2-Digit Industry Sector	New York State FTEs
Construction and Extraction Occupations	90
Office and Administrative Support Occupations	14
Installation, Maintenance, and Repair Occupations	14
Management Occupations	11
Business and Financial Operations Occupations	8
Transportation and Material Moving Occupations	5
Sales and Related Occupations	3
Production Occupations	2
Architecture and Engineering Occupations	2
All Other Occupations	2
Total FTE Jobs	**151**

Source: Strategic Economic Research's Economic Impact and Land Use Analysis Report; IMPLAN modeling tool, 2021.
Notes: Job numbers are preliminary estimates only. These estimates are subject to change based on site-specific conditions and workforce availability. Total employment estimates were verified by the Applicant in August 2024.

The Applicant has further evaluated the anticipated 90 FTE construction and extraction labor jobs to provide the estimated average construction workforce, by discipline for each quarter of the 18-month construction period. The Applicant estimates a quarterly peak of approximately 120 statewide construction FTE jobs during the third quarter of 2026. These quarterly labor averages were developed by estimating the monthly job values based on the seasonal fluctuations experienced in New York State and averaging the months together by quarter. For the purposes of this analysis, the summer and fall months of July, August, and September were assumed to be the peak construction season, and the winter months of January, February, and March were assumed to be the off-peak construction season. The results are summarized in Table 18-6 by five-digit NAICS industry sector divisions.

Table 18- 6. Estimated Quarterly Statewide Labor Averages by Discipline

Labor Discipline	Quarterly Period					
	Q1 2026	Q2 2026	Q3 2026	Q4 2026	Q1 2027	Q2 2027
Construction and Extraction Occupations						
Construction Laborers	6	11	22	11	6	11
Carpenters	4	8	16	8	4	8
First-Line Supervisors of Construction Trades and Extraction Workers	4	7	14	7	4	7
Electricians	3	7	14	7	3	7
Plumbers, Pipefitters, and Steamfitters	2	5	9	5	2	5
Operating Engineers and Other Construction Equipment Operators	2	4	7	4	2	4
Painters, Construction and Maintenance	1	2	5	2	1	2
Cement Masons and Concrete Finishers	1	2	5	2	1	2
All Other Occupations	7	14	28	14	7	14
Total Labor Average	**30**	**60**	**120**	**60**	**30**	**60**

Source: Strategic Economic Research's Economic Impact and Land Use Analysis Report; IMPLAN modeling tool, 2021.
Notes: Job numbers are preliminary estimates only. These estimates are subject to change based on site-specific conditions and workforce availability. Quarterly Averages verified by the Applicant in August 2023.

(b) Payroll and Non-Payroll Expenditures during Construction

The Economic Impact and Land Use Analysis (Appendix 18-A) indicates $22,762,630 of annual earnings for the estimated 151 FTE jobs for New York residents, $6,318,722 of which is the estimated annual earnings of the 44 FTE jobs for Seneca County residents. Estimated earnings represent total wages and salary compensation paid to New York State employees (i.e., wages plus average annual overhead costs including social security insurance [SSI], Medicare, workers' compensation, and disability). Estimates of the annual construction earnings by trade are listed in Table 18-7.

Table 18- 7. Estimated Earnings by Trade During Construction Period

Trade	Statewide Earnings During Construction Period	Statewide Earnings During First 12 Months of Construction Period
Construction and Extraction Occupations	$12,561,449	$8,374,299
Office and Administrative Support Occupations	$1,512,103	$1,008,069
Installation, Maintenance, and Repair Occupations	$1,849,163	$1,232,775
Management Occupations	$3,060,901	$2,040,601
Business and Financial Operations Occupations	$1,659,557	$1,106,371
Transportation and Material Moving Occupations	$574,745	$383,163
Sales and Related Occupations	$498,151	$332,101
Production Occupations	$303,049	$202,033
Architecture and Engineering Occupations	$366,409	$224,273
Other Occupations	$377,102	$251,401
Total	**$22,762,630**	**$15,175,087**

Source: Strategic Economic Research's Economic Impact and Land Use Analysis Report; IMPLAN modeling tool, 2021.
Note: Total refers to annual earnings of all FTE labor; for brevity, only the top sectors are presented in the table. Total earnings estimates were verified by the Applicant in August 2023. The construction period is estimated to last 18 months.

Local, regional, and statewide employment during the construction phase will primarily benefit those in the construction trades, including equipment operators, truck drivers, laborers, and electricians. The Applicant expects the majority of these construction jobs will be filled by residents of the local labor market. However, Facility construction will also require workers with specialized skills such as crane operators, solar energy facility assemblers, specialized excavators, and high voltage electrical workers. The Applicant plans to hire residents within the local labor market to fill the highly specialized positions to the extent practicable. Any highly specialized workers hired from outside the local labor market are anticipated to remain in the region only for the duration of construction.

The Applicant has estimated the amount of non-payroll project expenditures to be made within New York State, Seneca County, and the Towns of Junius and Waterloo during the construction period and these values are provided in in Table 18-8.

Table 18- 8. Estimate of Direct Non-Payroll Expenditures during Construction Period
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Construction Cost Item	Project Expenditures	State Share	Statewide Expenditures	County Share	Countywide Expenditures	Town Share	Town Expenditures
Equipment Costs							
Utility Interconnection							
Building							
Development							
Other Costs							

>END CONFIDENTIAL INFORMATION

(c) Workforce, Payroll, and Expenditures During Facility Operation

The Economic Impact and Land Use Analysis (Appendix 18-A) indicates the operation and maintenance of the proposed Facility is estimated to generate approximately one FTE job for New York residents with estimated annual earnings of approximately $138,020. Estimated earnings represent total wages and benefits (i.e., wages plus average annual overhead costs including social security insurance [SSI], Medicare, workers' compensation, and disability). A Seneca County resident is anticipated to hold this onsite operational job unless no qualified technicians are available.

Estimated annual non-payroll expenditures to be made within New York State, Seneca County, and the Towns of Junius and Waterloo during the operation and maintenance period are listed in Table 18-9. This includes materials and services purchased for the operation and maintenance of the Facility, and sales tax.

Table 18- 9. Estimate of Annual Direct Non-Payroll Expenditures during Operation and Maintenance
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Operation & Maintenance Expenditure Categories	Project Expenditures	State Share	Statewide Expenditures	County Share	Countywide Expenditures	Town Share	Town Expenditures
Materials & Equipment	[redacted]						
Services							
Sales Tax (Materials & Equipment Purchases)							

>END CONFIDENTIAL INFORMATION

Additionally, payments to local landowners within the Towns of Junius and Waterloo will be made in association with lease and easement agreements executed to host Facility components. Lease and easement payments will offer direct benefits to participating landowners and are estimated to total **BEGIN CONFIDENTIAL INFORMATION** <[redacted]> **END CONFIDENTIAL INFORMATION** during construction and installation. Lease and easement payments to participating landowners during the operational phase of the Facility are estimated to total **BEGIN CONFIDENTIAL INFORMATION** <[redacted]> **END CONFIDENTIAL INFORMATION** over the lifespan of the Facility, anticipated to be at least 35 years. These payments would be in addition to any income generated from the current use of the land that continues during project operation (e.g., agricultural production). The lease and easement payments will have a positive impact on the region, to the extent that participating landowners spend the additional revenue locally.

(d) Incremental School District Operating and Infrastructure Costs

The Facility is not expected to result in any additional operating or infrastructure costs to the Waterloo Central School District. Although it is possible that the long-term Facility operation employee may have school-aged children, increases in school district services and expenditures would likely be recovered

through those employees' property tax payments and the respective district's state aid. Moreover, as discussed in Section (g), the affected school districts will also benefit from PILOT agreements. These payments will more than offset any possible increase in expenses incurred by the districts because of Facility employee children entering the school districts. Before finalizing this Exhibit, the Applicant contacted the Waterloo Central School District. Going forward, the Applicant will continue to coordinate with the local school district. More generally, the Applicant has conducted numerous public outreach activities to inform the public and local officials about the Facility. For more details on outreach activities, please see Exhibit 2 (Overview and Public Involvement).

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

The Facility is not expected to cause local municipalities, authorities, or utilities to incur additional operating or infrastructure costs. The Facility will place limited (if any) demand on municipal services. In the unlikely event demand for municipal services increases, the additional costs will be recovered through fees and payments. For example, if long-term Facility operation employees live in the towns of Junius and Waterloo, their required services will be paid for through property taxes and utility fees. The Facility will not require municipal water, sewer, or solid waste disposal services.

As part of Exhibit 6 (Public Health, Safety, and Security), the Applicant has committed to developing and implementing a Site Security Plan and a Safety Response Plan. These plans address the site security features to be implemented at the Facility and measures for responding to various emergencies, including those that could involve police and other emergency response personnel. These measures, taken together, will limit the need for the Facility to utilize municipal police, fire, and emergency response services. Additionally, as discussed in Section (g), the Facility is expected to contribute significant annual revenue to the local Border City Fire Department, and the Junius Volunteer Fire Department, which will be available to cover any costs associated with municipal emergency response. The Site Security Plan (Appendix 6-A) and the Safety Response Plan (Appendix 6-B) were provided to the aforementioned local fire departments in December 2023. In addition, the Applicant has initiated outreach with the Seneca County Emergency Management Department. The Applicant also plans to host a consultation meeting with elected officials and local emergency responders in early 2024 to discuss solar safety and any feedback on the Site Security and Safety Response Plans. To date, no feedback on the Safety Response Plan has been received. The Applicant will continue to coordinate with local emergency service providers.

Although transportation of major Facility components during construction may impact certain roadways, the Applicant will work with the towns and county to mitigate these impacts through Road Use Agreements (RUAs), to the extent such agreements are necessary. Such agreements, if necessary, would require the Applicant to restore roadways impacted by the transportation of Facility components during construction and operation of the Facility. By virtue of these RUAs, the towns of Junius and Waterloo will not incur any additional highway maintenance costs related to the Facility other than normal wear and tear associated with the limited use of vehicles required to transport workers and equipment to and from the Facility Site for operation and maintenance purposes. The Applicant met with the Seneca County Highway Superintendent, and the Town of Junius and the Town of Waterloo highway superintendents on September

11, 2023, to discuss the Facility and its potential effects on transportation. The Applicant will continue to coordinate with the local highway supervisors. For more details on transportation, please see Exhibit 16 (Effect on Transportation).

Intervenor funding will be made available to qualified, locally affected parties and municipalities to offset certain expenses they incur in participating in the state permitting process. These funds are meant to encourage early and effective public involvement in project development and permitting. Upon the filing of the Article VIII Application, the Applicant will provide $90,000 ($1,000/MW) for the Project, which can be sought by local community members and the Towns of Junius and Waterloo.

Before finalizing this Exhibit, the Applicant consulted with the affected municipalities, public authorities, and utilities. The Applicant also conducted numerous public outreach activities to inform the public and local officials about the Facility. For more details on outreach activities, please see Exhibit 2 (Overview and Public Involvement).

(f) Jurisdictions that May Collect Taxes, Fees or Benefit Assessments

The following jurisdictions have authority to levy taxes, benefit assessments or user fees on the Facility:

- Seneca County
- Town of Junius
- Town of Waterloo
- Waterloo Central School District
- Border City Fire Department
- Junius Volunteer Fire Department

(g) Incremental Amount of Annual Taxes or Payments

The Applicant has initiated negotiation of a PILOT agreement for a real property tax exemption. Although the terms of the PILOT agreement have not been finalized, the estimated annual payment rate would total **BEGIN CONFIDENTIAL INFORMATION <[redacted]> END CONFIDENTIAL INFORMATION** per MW. The estimated annual PILOT amount would total **BEGIN CONFIDENTIAL INFORMATION <[redacted]> END CONFIDENTIAL INFORMATION** per year, escalating at rate of approximately **BEGIN CONFIDENTIAL INFORMATION <[redacted]> END CONFIDENTIAL INFORMATION** annually. Therefore, the PILOT payments would accumulate up to a total of approximately **BEGIN CONFIDENTIAL INFORMATION <[redacted]> END CONFIDENTIAL INFORMATION** over 20 years. The economic impact analysis assumed that after 20 years, ordinary property taxes for the Facility will resume. At the time of this analysis, the Applicant anticipates that annual HCA payments to the Towns of Junius and Waterloo would total approximately **BEGIN CONFIDENTIAL INFORMATION <[redacted]> END CONFIDENTIAL INFORMATION** per MW, escalating at rate of approximately **BEGIN CONFIDENTIAL INFORMATION <[redacted]> END CONFIDENTIAL INFORMATION** annually. The analysis in Appendix 18-A assumed that 23.6MW of the Facility are located in Junius and that 66.4MW are located in Waterloo. The Applicant also anticipates payments to the Border

City Fire Department and the Junius Volunteer Fire Department, in the amounts listed in Table 6 of Appendix 18-A.

Table 18-10 summarizes the estimated PILOT and HCA payments projected to be made to each taxing jurisdiction based on the Applicant's internal estimates. The payment amounts shown are based on the Facility's projected capacity of 90 MW and an estimated agreement duration of 20 years. Payment amounts would increase or decrease in direct proportion to changes in the Project's final installed capacity, and the total payment would increase if the duration of a PILOT agreement exceeded 20 years. Estimates of regularly-assessed property tax payments to be made after the estimated 20-year PILOT agreement term are included in Appendix 18-A.

Table 18- 10. Estimated PILOT and HCA Payments
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Taxing Jurisdiction	Annual Payment Estimate for Year 1	20-Year Estimate
Seneca County	[redacted]	
Town of Junius		
Town of Waterloo		
Waterloo Central School District		
Facility Total		

>END CONFIDENTIAL INFORMATION

(h) Comparison of Incremental Costs and Incremental Benefits

As discussed, the Facility is not expected to impose incremental costs on local tax jurisdictions. Moreover, implementing a PILOT Agreement consistent with 16 NYCRR Section 1100-6.1(f) will result in significant benefits to local taxing jurisdictions.

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

Exhibit 6 (Public Health, Safety, and Security) describes all contingency plans to be implemented in response to a safety or security emergency. The local emergency responders are not expected to require equipment or training to respond to a fire, hazardous substance, or medical emergency beyond the first aid, medical emergency, fire vehicles, and equipment typically found at a local rural fire department. Therefore, local emergency responders are expected to be able to fulfill the contingency plans for the Facility without specialized equipment or training. Exhibit 6 (Public Health, Safety, and Security), along with the Safety Response Plan (Appendix 6-B), provides specific details on all onsite equipment and systems the Applicant will provide to prevent or handle fire emergencies and hazardous substance incidents, as well as the training drills that will be conducted with emergency responders and onsite personnel. Because local emergency responders are not expected to provide emergency services beyond those ordinarily provided, no equipment or training deficiencies are anticipated. Local emergency responders were provided with a copy of the Safety Response Plan in December 2023 for review and comment. The Applicant also plans to host a

consultation meeting with elected officials and local emergency responders in early 2024 to discuss any input on the Safety Response Plan. To date, no feedback on the Safety Response Plan has been received. The Applicant will continue to coordinate with local emergency service providers. For additional information on consultation with emergency service providers, please see Exhibit 6 (Public Health, Safety, and Security).

(j) 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 New York State Department of Transportation (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 Facility 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 facility components traveling on and crossing state highways. Therefore, this section provides a detailed statement regarding the Facility's consistency with smart growth criteria. As discussed below, the Facility is consistent with six of the eleven criteria, while the remaining five criteria do not apply to the Facility.

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 solar-powered electrical-generating facility that will provide a source of renewable energy to the New York State grid, and in doing so, improve the State's existing energy infrastructure. While the Facility components are not public infrastructure and are generally not expected to result in the operation of public infrastructure, the Facility will contribute up to 90 MW of renewable energy to the New York State grid. Additionally, the Facility will use portions of existing state highway infrastructure to transport equipment. However, none of these activities are anticipated to have any long-term impact on existing infrastructure. The North Seneca Solar Project is consistent with this smart growth criterion, when its contribution to and utilization of both the New York State power grid and transportation routes identified above are considered. The necessary changes to the public infrastructure (e.g., contribution of renewable energy to the power grid and the utilization of existing transportation routes and construction of access road intersections to existing roads) are also consistent with the criterion.

Criterion 2: To advance projects located in municipal centers.

"Municipal centers" are defined in the Smart Growth Act 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." Utility-scale solar energy projects, such as the Facility, require extensive land; moreover, the requirement for setbacks from residences and other structures restricts utility-scale solar energy projects to areas with lower population density. Therefore, this criterion does not apply to the Facility.

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.

See discussion of Criterion 2. Utility-scale solar energy projects such as the North Seneca Solar Project cannot be located within areas designated for concentrated infill development nor are they well-suited to developed waterfront areas and/or brownfield opportunity areas. Therefore, this criterion does not apply to the Facility.

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.

The Facility will generate up to 90 MW of clean, renewable energy without emitting any conventional air pollutants or greenhouse gases (GHGs), consuming cooling water, or generating wastewater while in operation. In general, the Facility Site includes lands suitable for the construction of a solar facility and does not include unique environmental resources, critical environmental areas, or unusual land uses relative to other locations in the surrounding region. As described throughout this Article VIII Application, the layout of the Facility was designed through an iterative process where the technical and economic requirements of the Facility were weighed against impacts to land use (see Exhibit 3 and 15), aesthetics (see Exhibit 8), cultural resources (see Exhibit 9), environmental/ecological resources (such as forests, wetlands, and sensitive wildlife habitat) (see Exhibits 11, 12, and 14), surface and groundwater (see Exhibit 13), and public safety (see Exhibit 6). Within the constraints of the permitting process and the inherent constraints on the Site, the proposed Facility layout avoids or minimizes environmental impacts to the greatest extent practicable while allowing the Applicant to construct a 90 MW solar facility in furtherance of the state's renewable energy goals. This Article VIII Application summarizes and includes analyses of the potential environmental impacts and benefits of the Facility, including analyses specifically associated with agricultural land, agricultural viability, forests, surface and groundwater, air quality, recreation and open space, scenic areas, and significant historic and archaeological resources. In addition, a Visual Impact Assessment (Appendix 8-A) has been prepared which assesses potential visual impacts within a 2-mile radius of the Facility Site. Based on these analyses, the Applicant believes that the Facility has avoided and minimized impacts to these resources to the maximum extent practicable. Therefore, the Facility is consistent with this criterion.

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.

See response to Criterion 2. The Facility must be located in a rural area well removed from any areas of compact development, downtown revitalization, or significant densities of housing, etc. Therefore, this criterion is not applicable.

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

The Facility does not affect public transportation options. Therefore, this criterion is not applicable.

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 Facility (see Exhibit 2). This has included the public outreach conducted in accordance with the requirements of the Article VIII process. The Applicant also has reached out individually to each of the local governments in which the Facility is located. Moreover, the Article VIII process specifically requires outreach and coordination between the Applicant and state agencies with a role in reviewing the Application for the proposed Facility. To the extent applicable, these outreach efforts and municipal/agency consultations satisfy the criterion related to coordination between state and local governments.

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

The Applicant has conducted and will continue to conduct extensive public outreach to community-based organizations throughout the development and review of the Facility. See response to Criterion 7 for additional detail. These outreach efforts satisfy the criterion related to participation in community-based planning and collaboration.

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

The Applicant has no role in or authority over the development or enforcement of building or land use codes in the towns of Junius and Waterloo. Therefore, this criterion does not apply to this Facility.

Criterion 10: To promote sustainability by strengthening existing and creating new communities which reduce GHG 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 initiatives that reduce GHG emissions and contribute to the transition of New York's energy markets by encouraging renewable alternatives, such as the Climate Leadership and Community Protection Act (CLCPA). The Facility promotes the reduction of emissions using renewable energy. The Facility, therefore, supports this smart growth criterion. Exhibit 17 provides a more detailed discussion of the Facility's consistency with energy planning objectives.

Criterion 11: To mitigate future physical climate risk due to sea level rise, and/or storm surges, and/or flooding, based on available data predicting the likelihood of future extreme weather events, including hazard risk analysis data if applicable.

The Facility is consistent with New York State's efforts to expand reliance on renewable energy sources and reduce GHG emissions. In doing so, this Facility contributes to efforts to mitigate overall future risks of climate change, such as sea level rise, storm surges, and/or flooding. Furthermore, according to the New York State Department of State (NYSDOS) Geographic Information Gateway, the Facility is not located in mapped hazard risk areas related to physical climate risks, including risks associated with the Lake Ontario, Hudson River, and Atlantic Ocean (NYSDOS 2021). Therefore, the Project is expected to have a positive impact on the mitigation of future physical climate risk, thereby supporting Smart Growth Criterion 11. Please see Exhibit 6 for additional information on the presence of flood hazard zones and absence of storm surge zones within the Facility Site.

Smart Growth Attestation

The Smart Growth Act requires that the chief executive officer of a state infrastructure agency (or his or her designee) attest in writing that the project under review, to the extent practicable, meets the relevant smart growth criteria in ECL § 6-0107(2). As previously noted, the Facility will not result in the construction or operation of public infrastructure as that term is used in the Smart Growth Act. As a result, the requirement to obtain an attestation from the chief executive officer of a state infrastructure agency does not apply to the Facility.

(k) Host Community Benefits

The Economic Impact and Land Use Analysis (Appendix 18-A) suggests that the construction and operation of the North Seneca Solar Project will positively impact Seneca County and the towns of Junius and Waterloo. The Facility will provide direct financial benefits to host communities, significantly increasing local revenues without requiring new public infrastructure. Direct payments will occur within the host communities in the form of PILOT and HCA payments, land leases, easement payments, and purchases of local goods and the provision of employment and spending of wages. The following is a list of direct payments anticipated to be spent within local communities (for additional details, see Section (g)):

- Lease and easement payments will offer direct benefits during construction and installation totaling approximately an estimated **BEGIN CONFIDENTIAL INFORMATION** <[redacted]> **END CONFIDENTIAL INFORMATION** to participating landowners.
- During the Facility's operating life, lease and easement payments will offer direct benefits totaling approximately an estimated **BEGIN CONFIDENTIAL INFORMATION** <[redacted]> **END CONFIDENTIAL INFORMATION** to participating landowners over an anticipated 35-year lifespan of the Facility.

- Although the terms of the PILOT and HCA agreements have not been finalized, the Applicant anticipates the local taxing jurisdictions to receive, based on an estimated 20-year agreement term, up to a total of approximately **BEGIN CONFIDENTIAL INFORMATION <[redacted]> END CONFIDENTIAL INFORMATION.** This total includes estimated PILOT payments and estimated HCA payments, which would be made directly to the Towns of Junius and Waterloo.
- The Applicant also anticipates payments to the Border City Fire Department and the Junius Volunteer Fire Department, in the amounts listed in Table 6 of Appendix 18-A.

In accordance with 16 NYCRR Section 1100-10.2(j), the Applicant will provide documentation of host community benefits to be provided as a Pre-Construction Compliance Filing.

REFERENCES

IMPLAN Group. 2020. Understanding Multipliers. Available at https://implanhelp.zendesk.com/hc/en-us/articles/115009505707-Understanding-Multipliers (Accessed January 2021).

Just Transition Working Group. 2021 Jobs Study. March 2023: Vintage Update. Available at: https://climate.ny.gov/resources/draft-scoping-plan/ (Accessed May 2023).

National Association of State Energy Officials (NASEO), the Energy Futures Initiative, and BW Research Partnership. 2020. Wages, Benefits, and Change. Available at: https://www.usenergyjobs.org/wages (Accessed May 2023).

New York State Comptroller. Financial Data for Local Governments. 2022. Available at: http://wwe1.osc.state.ny.us/localgov/findata/financial-data-for-local-governments.cfm (Accessed December 2023).

New York State Department of Taxation and Finance. 2022. New York State Sales and Use Tax Rates by Jurisdiction. Available at: https://www.tax.ny.gov/bus/st/rates.htm (Accessed December 2023).

New York State Department of State. 2021. New York State Geographic Information Gateway. Available at: http://opdgig.dos.ny.gov/#/map (Accessed July 2021).

New York State Office of Real Property Tax Services (NYSORPTS). Municipal Profiles for 2022 (web database portal). Available at: http://orpts.tax.ny.gov/MuniPro/ (Accessed December 2023).

U.S. Census Bureau. 2022. 2017-2021 American Community Survey 5-Year Estimates, Decennial census. Available at https://data.census.gov/cedsci/ (Accessed December 2023).

U.S. Census Bureau. 2022. Quarterly Workforce Indicator (QWI) Explorer. Available at: https://qwiexplorer.ces.census.gov/static/explore.html#x=0&g=0 (Accessed December 2023).

DOE. 2022a. U.S. Energy and Employment Report. Available at: https://www.energy.gov/media/275712 (Accessed June 2023).

DOE. 2022b. Energy Employment by State. Available at: https://www.energy.gov/media/275710 (Accessed June 2023).

U.S. Department of Labor (USDOL) Bureau of Labor Statistics. 2019. May 2022 State Occupational Employment and Wage Estimates New York. Available at https://www.bls.gov/oes/current/oes_ny.htm#47-0000 (Accessed May 2023).