High Bridge Wind Project
Preliminary Complaint Resolution Plan

High Bridge Wind, LLC

2019

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Introduction

High Bridge Wind, LLC ("High Bridge Wind") plans to construct, operate and maintain its High Bridge Wind Project ("Project") located in the Town of Guilford, Chenango County, New York, in a manner that is consistent with applicable laws and regulations and responsible community engagement. High Bridge Wind recognizes noise, shadow flicker, visual and other impacts during construction and operation of a wind farm could be perceived by community members as unwelcome.

High Bridge Wind takes complaints that it receives from members of the public very seriously. This Complaint Resolution Plan has been developed to establish a process for responding to complaints regarding the construction and operation of the Project in a timely and consistent manner.

General Project Communications

General project information will be posted on the High Bridge Project website and communicated in local town meetings, as appropriate. This information will include information about the status of the Project as well as the process of filing a complaint concerning Project activities. Prior to the start of construction, the Applicant will notify stakeholders of construction activities and any applicable safety and security measures. During the construction phase, posted information will include the anticipated construction schedule, transportation routes, and traffic control measures. During operations, if major maintenance is required, information on the project maintenance schedule, transportation routes and traffic control measures (if needed) will be posted.

Contact Information

Prior to commencement of construction, High Bridge Wind will establish a toll-free number and designated email address at which High Bridge Wind can receive communications from the public regarding complaints during the construction phase. High Bridge Wind will communicate through mailings and notices in local newspapers the number and the email address to host and adjacent landowners, host municipalities, and the New York State Department of Public Service (DPS) prior to commencement of construction and will also provide the contact name(s) and address(es) of the individual(s) responsible for managing complaints during the construction phase.

Immediately prior to the commencement of commercial operations, High Bridge Wind will communicate updates to the contact name(s) and address(es) of the individual(s) responsible for managing complaints during the operational phase to host and adjacent landowners, host municipalities, DPS, and other permitting agencies, as necessary. If necessary, the notices will also include updates to the toll-free number and designated email address. High Bridge Wind will notify these parties and individuals through mailings and notices in local newspapers.

High Bridge Wind will thereafter update contact information on the website on an as-needed basis.

Registering a Complaint

Complaints may be made the following ways:

1. Calling the local operations and maintenance (O&M) building—a permanent component of the Facility—or the toll-free number and speaking directly with construction and operations personnel; or
2. Writing High Bridge Wind at its local address or using the designated email address as indicated on the website.

If High Bridge Wind-affiliated workers are approached directly with complaints during construction, the complainant will be referred to the High Bridge Construction Site Manager. If High Bridge Wind-affiliated workers are approached directly with complaints during Project operation, the worker will take the complainant's contact information and report the complaint immediately to the Operations Manager. For safety reasons, members of the public will not be allowed on-site

If any complaints are received by the Town of Guilford, DPS, or the New York State Department of Environmental Conservation, they will notify High Bridge Wind of the complaint via email. As discussed below, all complaints, regardless of how they are received, will be recorded on the Complaint Log Sheet attached to this Plan.

Complaint Response Program

High Bridge Wind will implement a six-point complaint response program for all registered complaints.

1. Community Engagement

It is important that residents and local public officials have reasonable access to Project personnel. As previously noted, High Bridge Wind will provide and advertise a toll-free number, email address, and mailing address that the public can use to contact company personnel. During construction, the toll-free number and email address will be checked by High Bridge Wind personnel periodically to see if a message has been received. High Bridge Wind will maintain open lines of communication with local and State officials to ensure it receives any complaints that are made directly to Town, the County, or the State.

2. Process for Gathering and Analyzing Information Regarding the Complaint

Upon receipt of a complaint, it is essential that High Bridge Wind know the characteristics, circumstances, and facts giving rise to the complaint or issue. To obtain the necessary information, High Bridge Wind representatives will contact the individual within 48 hours of receipt of a complaint to determine the nature of the complaint. At that time, High Bridge Wind will ask for a description of the complaint, location, time of day, duration, and any other defining circumstances as needed to further assess the issue.

In some cases, a local resident may just want to express a concern or an opinion and does not expect any further action. In those circumstances, a conversation with Project personnel may resolve the complaint. Project personnel will record the conversation on the attached Complaint Log Sheet, but no additional follow up is required.

For all other complaints, High Bridge Wind will investigate the circumstances of the complaint to determine whether it has merit. The nature of the investigation will differ depending on the type of complaint and whether it involves Project construction or operation activities. Below is an outline of the steps required to investigate the types of complaints most likely to be raised concerning construction and operation of the Project based on experience in the wind energy industry:

Construction-Related Complaints[1]

Blasting

- Detailed information specific to the blasting complaint will be logged, including the type of complaint (e.g., noise, vibration, water well issues, or safety), the timing, duration, and severity of blasting impacts, and whether the complainant was notified of blasting activities.
- Blasting activities occurring on the date and at the time and location identified by the complainant will be investigated to determine what activities were occurring on that date.
- Steps will be taken to determine whether blasting activities were conducted in accordance with the Blasting Plan.
- Future planned blasting activities near the complainant will be identified to enable coordination to minimize future disturbance.
- If this preliminary assessment does not reveal any obvious source of the impacts, additional investigation will be considered, as necessary, based on the circumstances of the complaint.

Noise

- See the Noise Complaint Resolution Plan (Appendix 19-B of the High Bridge Wind Project Article 10 Application).

Stormwater, Dust and Similar Impacts

- Detailed information from the complainant concerning type/source of impact (date, time of day, weather conditions, location, description of impact, etc.) will be logged.
- Construction activities occurring on the date, and at the time and location identified, will be investigated to determine what activities were occurring on that date.

[1] Construction-related complaints cover both complaints during construction and decommissioning of the Project.

- Steps will be taken to determine whether the appropriate pollution prevention measures were/are in place as outlined in the stormwater pollution prevention plan (SWPPP), dust control plan or other relevant plans.
- Future planned construction activities will be identified to assess the likelihood of similar problems in the same location or elsewhere.
- If this preliminary assessment does not reveal any obvious source of the impacts, consider whether additional investigation is necessary based on the circumstances of the complaint.

Operation-Related Complaints

Noise

- See the Noise Complaint Resolution Plan (Appendix 19-B of the High Bridge Wind Project Article 10 Application).

Shadow Flicker

- If the complaint represents a residence within 5,184 feet (1,580 meters or 10 times the rotor diameter of Project turbines) of any wind turbine, High Bridge Wind will:
    - Investigate the operating conditions of the equipment near the residence represented by the complaint at the date, time and location identified;
    - Review the final shadow flicker report to determine whether the duration and timing of the shadow flicker reported at the residence represented by the complaint comports with what was predicted for that site; and
    - Determine whether conditions have changed that might impact perceived shadow flicker at the complaint location (e.g., tree removal, annual occupation of a previously seasonally-occupied residence, etc.).

High Bridge Wind may request that a complainant maintain a written log of shadow flicker occurrence over some reasonable period. Based on its investigation and information provided by the complainant, High Bridge Wind may conduct follow-up monitoring to quantify and verify the timing and duration of shadow flicker received in a given location.

Complaints representing residences more than 5,184 feet from the nearest wind turbine will not be investigated as the intensity of the shadow of the rotating blades beyond this distance is sufficiently diminished so as to have no substantial impact on occupied buildings.

Where the investigation of a complaint in the operational period shows a condition that cannot be easily remedied, the investigation should assess whether the condition complies with the terms and conditions of the Project certificate.

Other Complaints

Complaints concerning construction/operation of the Project other than those identified above (i.e., degraded cell service, communication impacts or degraded TV reception) will be recorded on the Complaint Log Sheet attached as Exhibit A and investigated, as appropriate, based on the nature of the complaint.

3. Complaint Tracking

High Bridge Wind will maintain a written log of all complaints concerning the Project during construction and operation, using the Complaint Log Sheet attached hereto as Exhibit A. The log will include all completed Complaint Log Sheets, which contain basic information about the complaint (name of complainant, date complaint received, nature of complaint, results of investigation, plans for resolution, follow-up with complainant), and copies of any supporting documentation assembled. A copy of the log will be provided to DPS staff and/or the Siting Board per the frequency agreed to in the Certificate Conditions.

4. Complaint Response

In instances where the conversation with Project personnel does not immediately resolve the complaint, High Bridge Wind will investigate the complaint as outlined above and work with the complainant in good faith to resolve their concerns within a reasonable time and will provide a timely written response to the complainant within 30 days of receipt of the complaint. As practicable, complaint response timelines will be accelerated during the construction phase to accommodate the potential immediate nature of complaints received during this phase.

For shadow-flicker-related complaints during the operational period, if it is determined that shadow flicker exceeds 30 hours at a non-participating residence not identified in the final shadow flicker report, and that was in existence at the time the report was produced, the mitigation options identified in the Shadow Flicker Report will become available to the complainant.

5. Complaint Response Follow Up

After High Bridge Wind has provided the written response to the complainant pursuant to Step 4 above, High Bridge Wind personnel will follow up with the complainant after a reasonable amount of time to inquire if the matter has been resolved and determine if there are any residual issues that need further attention. The results of the complaint follow-up will be recorded on the Complaint Log Sheet.

6. Further Action

High Bridge Wind will report to DPS staff any complaints not resolved within 60 days of receipt. If there are issues specific to a complaint that remain unresolved, High Bridge Wind may engage in more formal conflict

resolution. Further action will consider project-specific factors and will be decided on a case-by-case basis, using input from outside consultants, legal counsel, and upper management of High Bridge Wind, as appropriate.

EXHIBIT A. Complaint Log Sheet

Complaint Log Sheet

After completing this form, immediately email a copy to the Site Manager, Operations Manager, and EHS Specialist

Personnel Receiving the Complaint:	
Method of Receiving Complaint (circle one): Phone Email Mail Other (describe)	
Date Complaint Received (MM/DD/YY):	(circle) Mon. Tue. Wed. Thur. Fri. Sat. Sun.
Time Complaint Received:	

Complaint Information

Name of Complainant:
Address of Complainant:
Phone Number of Complainant:
Date/Time of Bothersome Activity:
Construction or Operation Complaint? (circle one)
Complaint (describe in detail):

Resolution and Follow-up

Definition of problem after investigation by Project personnel:
Description of corrective measures taken:
Date corrective measure(s) completed: Date first letter sent to complainant: (copy attached) Date second letter sent to complainant: (copy attached)
Follow-up actions if correctives measure(s) unsuccessful or unavailable:

This information is certified to be correct: _____

(Attach additional pages and supporting documentation, as required.)