



## **FLAT CREEK SOLAR**

**Permit Application No. 23-00054**

**§ 1100-2.19 Exhibit 18  
Socioeconomic Effects**

**Contents**

Glossary Terms..... ii

Acronym List ..... iii

Exhibit 18 Socioeconomic Effects ..... 1

    18(a) Onsite Construction Work Force Impacts ..... 3

    1(b) Construction Payroll and Expenditures ..... 4

    1(c) Operation and Maintenance Employment Impacts ..... 6

    1(d) School District Impacts During the Construction and Operation Phases ..... 8

    1(e) Municipal, Public Authority, and Utility Services Impacts during the Construction and Operation Phases ..... 8

    1(f) Designated Tax Jurisdiction, Tax and Payment Impacts ..... 9

    1(g) Host Community Benefits..... 9

    1(h) Comparison of Fiscal Costs to Jurisdictions ..... 11

    1(i) Analysis of Local Emergency Response ..... 12

    1(j) Consistency with State Smart Growth Public Infrastructure Criteria ..... 12

    1(k) Host Community Benefits Provided by the Applicant..... 16

References ..... 18

**Tables**

Table 18-1. Demographics<sup>1</sup> ..... 1

Table 18-2. Applicant’s Forecasted FTE Jobs during Facility Construction ..... 3

Table 18-3. Applicant’s Forecasted Labor Force during Facility Construction ..... 4

Table 18-4. Estimated Non-Payroll Expenditures during Development and Construction of the Facility..... 5

Table 18-5. Applicant’s Forecasted Annual Labor Force during Facility O&M ..... 6

Table 18-6. Annual Direct Expenditures, Facility O&M..... 7

Table 18-7. Approximate Cumulative PILOT and HCA Payments for Facility ..... 10

## Glossary Terms

<b>Applicant</b>	Flat Creek Solar NY LLC, a subsidiary of Cordelio Power LP, the entity seeking a siting permit for the Facility from the Office of Renewable Energy Siting and Electric Transmission (ORES) under Article VIII of the New York State Public Service Law.
<b>Facility</b>	Flat Creek Solar, a 300 MW solar generating facility located in the Towns of Root and Canajoharie, NY. The proposed Facility components to be constructed for the generation, collection, and distribution of energy for Flat Creek Solar include solar panel modules, electrical collection system, collection substation, point of interconnection (POI) switchyard, access roads, laydown/staging areas, and other ancillary facilities.
<b>Facility Site</b>	The participating parcels encompassing Facility components, which totals approximately 3,794 acres in the Towns of Canajoharie and Root, Montgomery County, New York (Figure 2-1).
<b>Study Area</b>	The Study Area for the Facility includes a radius of five miles around the Facility Site boundary, unless otherwise noted for a specific resource study or Exhibit. The 5-mile Study Area encompasses approximately 108,667 acres, inclusive of the approximately 3,794-acre Facility Site.
<b>Limit of Disturbance (LOD)</b>	The area to which temporary construction impacts will occur, totaling approximately 1,637 acres.

## Acronym List

Applicant	Flat Creek Solar NY LLC
ACS	American Community Survey
BLS	Bureau of Labor Statistics
CLCPA	Climate Leadership and Community Protection Act
County	Montgomery County
CSD	Central School District
ECL	Environmental Conservation Law
EPC	Engineering, Procurement, And Construction
FTE	Full-Time Equivalent
GHG	Greenhouse Gas
HCA	Host Community Agreement
LOD	Limit of Disturbance
MW	Megawatt
NYISO	New York Independent System Operator
O&M	Operation and Maintenance
ORES	Office of Renewable Energy Siting and Electric Transmission
PILOT	Payment in Lieu of Taxes
POI	Point of Interconnection
SRP	Safety Response Plan
Towns	Towns of Canajoharie and Root

**Exhibit 18 Socioeconomic Effects**

This Exhibit provides information required in accordance with the requirements of §1100-2.19 of the Article VIII Regulations.

The proposed Facility is anticipated to have local, countywide, and statewide economic 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). Exhibit 18 presents a socioeconomic analysis that quantifies the potential socioeconomic effect of the Facility. This analysis includes the socioeconomic profile of the proposed host communities followed by an estimate of the various socioeconomic benefits associated with the Facility, including direct employment estimates, as well as estimates of the benefits to the host communities resulting from the construction and operation of the Facility.

The Facility is located in the Towns of Root and Canajoharie (Towns) in Montgomery County (County), New York. The current demographic profiles of the communities are presented in Table 18-1 below:

**Table 18-1. Demographics<sup>1</sup>**

<b>Population</b>	<b>Town of Canajoharie (host)</b>	<b>Town of Root (host)</b>	<b>Montgomery County</b>	<b>New York</b>
<b><i>Population</i></b>				
2010 Population <sup>2</sup>	3,730	1,715	50,219	19,378,102
2022 Population	3,670	1,961	49,333	19,673,200
2020 Population per square mile	N/A	N/A	122.9	428.7
Median Age	35.8	38.4	40.6	39.3
Veterans	5.7%	8.6%	5.4%	3.2%
Foreign-born population	1.7%	0.7%	3.1%	22.6%
High school graduate or higher	86.6%	88.8%	88.8%	87.6%
<b><i>Race and Ethnicity</i></b>				
White	94.5%	94.8%	91.9%	68.6%

**Table 18-1. Demographics<sup>1</sup>**

<b>Population</b>	<b>Town of Canajoharie (host)</b>	<b>Town of Root (host)</b>	<b>Montgomery County</b>	<b>New York</b>
Black or African American	0.6%	1.1%	4.0%	17.7%
American Indian/Alaska Native	0.9%	0.0%	0.7%	1.0%
Asian	0.7%	0.1%	1.1%	9.6%
Native Hawaiian/Other Pacific Islander	0.1%	0.0%	0.2%	0.1%
Two or more races	2.7%	3.7%	2.2%	2.8%
Hispanic or Latino (any race)	2.3%	2.4%	15.8%	19.7%
<b><i>Housing</i></b>				
Total housing units	1,479	889	22,989	8,586,228
Owner-occupied units, rate	61.8%	75.8%	68.7%	54.3%
Median value of owner-occupied units	\$116,300	\$155,500	\$132,300	\$384,100
<b><i>Income and Employment</i></b>				
Median household income (2021\$)	\$64,205	\$69,500	\$58,033	\$81,386
Individuals below poverty level	10.4%	6.0%	13.7%	14.3%
Labor Force, March 2024, Bureau of Labor Statistics (BLS) <sup>3</sup>	N/A	N/A	21,857	9,717,996
Unemployment Rate, March 2024 (BLS) <sup>3</sup>	N/A	N/A	5.2	4.2
N/A indicates data are not available.				
<sup>1</sup> Unless otherwise noted, data are from the US Census Bureau's 2018-2022 American Community Survey (ACS) 5-year estimates program.				
<sup>2</sup> US Census 2010 decennial census.				
<sup>3</sup> US Bureau of Labor Statistics, 2024. Note that statistics are not available for the Towns of Canajoharie, Palatine, and Root.				

**18(a) Onsite Construction Work Force Impacts**

Flat Creek Solar NY LLC (the Applicant) developed construction job estimates based on experience with similar projects and the specific requirements of the Facility. The average and peak labor forecast were determined by evaluating the expected job counts and construction duration. Jobs are expressed in terms of year-long, full-time equivalent (FTE) positions (2,080-hour units of labor).

The Applicant estimates a total of 121 FTE jobs will be generated during construction of the Facility. The construction trades that will benefit the most from the construction of the Facility by the creation of FTE jobs will be electricians (55 FTE jobs) and laborers (47 FTE jobs). Table 18-2 summarizes the Applicant’s forecast of the employment by job type and quarter associated with the construction of the Facility.

**Table 18-2. Applicant’s Forecasted FTE Jobs during Facility Construction**

<b>Job Types</b>	<b>Q1 of work</b>	<b>Q2 of work</b>	<b>Q3 of work</b>	<b>Q4 of work</b>	<b>Q5 of work</b>	<b>Q6 of work</b>	<b>Q7 of work</b>	<b>Q8 of work</b>	<b>Peak Employment</b>	<b>FTE Jobs<sup>2</sup></b>
Laborers	4	15	29	29	35	35	21	21	35	47
Electricians	1	18	34	34	41	41	26	26	41	55
Equipment Operator	1	1	4	4	4	4	4	2	4	6
Construction Managers	1	1	6	6	6	6	5	5	6	9
Foreman	0	1	2	2	2	2	2	2	2	3
<b>Total FTE Jobs</b>	<b>7</b>	<b>36</b>	<b>75</b>	<b>75</b>	<b>88</b>	<b>88</b>	<b>58</b>	<b>56</b>	<b>88</b>	<b>121</b>

Note: Numbers shown may not sum to totals because of rounding.

<sup>1</sup>Peak employment is anticipated to occur during Q5 and Q6.

<sup>2</sup>Jobs are expressed in terms of year-long, FTE positions (2,080-hour units of labor).

Employment is forecasted to peak during the 5<sup>th</sup> and 6<sup>th</sup> quarters. Peak employment will total 88 workers on the job. It is expected that 82 of these jobs will be in the construction discipline and 6 jobs will be onsite construction managers.

## 1(b) Construction Payroll and Expenditures

The Applicant has developed construction cost estimates for labor, equipment, and materials based on the specifics of the facility. The Applicant has provided estimates of the construction payroll by trade for the anticipated 24-month construction period. Payroll and wage rates reflect the Engineering, Procurement, And Construction (EPC) guidance, recent prevailing wages in New York State, and the annual inflation levels of recent years. As shown in Table 18-3, the Facility's construction payroll is forecast to total \$76.9 million over 24-month construction period, with an estimated 12-month payroll of \$38.4 million.

**Table 18-3. Applicant's Forecasted Labor Force during Facility Construction**

Type of Job	Annualized (12-month) Payroll	Estimated Payroll
Laborers	\$12,088,440	\$24,176,880
Electricians	\$18,414,781	\$36,829,561
Equipment Operator	\$2,134,330	\$4,268,659
Construction Managers	\$4,118,400	\$8,236,800
Foreman	\$1,690,000	\$3,380,000
<b>Total</b>	<b>\$38,445,950</b>	<b>\$76,891,900</b>

The Facility is located in the Mohawk Valley Economic Region of New York, which includes Fulton, Herkimer, Montgomery, Oneida, Otsego, and Schoharie counties. According to the U.S Census Bureau and the Bureau of Labor Statistics, the region is home to approximately 480,000 people (U.S. Census 2023) and has a labor force of approximately 218,000 (BLS 2024). The large labor force in the area provides an expanded opportunity for the hiring of local labor.

The exact mix of local and non-local workers cannot be precisely estimated because the qualifications and availability of prospective workers in the region are unknown at this time; however, the Applicant anticipates a significant number of local hires could be made from Montgomery County and the surrounding counties. Based on the available labor force of the Mohawk Valley Economic Region, it is estimated that between 60 percent and 90 percent of the construction workers would be from the local six-county region. During the peak construction

period, therefore, it is estimated that between roughly 53 and 80 local workers would be employed in the construction of the Facility. Additional construction workers are expected to be hired from within New York State. At this time, it is impossible to predict in which towns those workers will reside. The Applicant intends to hire locally to the extent that qualified workers are available. A review of the most recent ACS data from the U.S. Census indicates that the Towns have 300 workers employed in the construction industry. Qualified workers hired by the Applicant may include some of these workers who reside in the Towns; however, they also may reside in any one of Montgomery County’s many other communities or in neighboring counties.

Local workers outside the construction industry are also anticipated to benefit from the Facility’s development as materials are purchased and equipment is rented from businesses in Montgomery County and the surrounding region. Implementation of the landscaping plan, for example, is anticipated to include the purchase of local materials, to the extent sufficient plantings are available, and the employment of local laborers for installation. Local restaurants, hotels, campgrounds, gas stations, and retail locations are anticipated to receive additional business activity, which may necessitate an increase in worker hours and, thereby, income.

Table 18-4 below presents the anticipated total non-payroll expenditures during construction of the Facility. As described above, the costs presented are based on the Applicant’s experience with previous projects and the current Facility design. Actual costs will vary based on the duration and extent of economic disruptions in the EPC market.

**BEGIN CONFIDENTIAL INFORMATION <**

**Table 18-4. Estimated Non-Payroll Expenditures during Development and Construction of the Facility**

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

**> END CONFIDENTIAL INFORMATION**

As detailed above, Applicant-provided non-payroll cost estimates are roughly **BEGIN CONFIDENTIAL INFORMATION [REDACTED] > END CONFIDENTIAL INFORMATION**. The costs include equipment and materials, site preparation, generator set-up, interconnection lines, and modules. The Applicant anticipates that a portion of the electrical components will be purchased from New York suppliers, with preference given to suppliers within the Mohawk Valley Economic Region. The Applicant anticipates up to **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION** in site preparation expenditures will be spent in the vicinity of the Facility, with preference for vendors in the Host Towns and County. Landscaping expenditures are included in the site preparation cost estimate and are anticipated to be made from within Montgomery County to the extent materials available. To the extent available, the Applicant will also use local suppliers for supporting the Facility.

**1(c) Operation and Maintenance Employment Impacts**

Based on experience with specific needs of the Facility, the Applicant has evaluated the expected number of jobs and the onsite payroll, by discipline, that will be required during a typical year once the Facility is in operation. The jobs shown here are expected to be performed by New York workers. Table 18-5 summarizes the Applicant’s annual employment forecast associated with the operation and maintenance (O&M) of the Facility.

**Table 18-5. Applicant’s Forecasted Annual Labor Force during Facility O&M**

Type of Job	Number of FTE Jobs Created	Payroll <sup>1</sup>
Solar Technician	2	<b>BEGIN CONFIDENTIAL INFORMATION &lt; [REDACTED] &gt; END CONFIDENTIAL INFORMATION</b>
<sup>1</sup> Payroll includes wages and salaries, benefits, and payroll taxes.		

Employment during the O&M phase is estimated to be two FTE jobs. Payroll associated with these jobs is expected to be **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION** annually. It is anticipated that the Applicant’s O&M labor force will live in the vicinity of the Facility. The most recent ACS data show 206 workers employed in

the transportation, warehousing, and utilities industries in the Towns. While the Applicant intends to hire qualified local workers to the extent available, it is impossible to predict where future workers may currently reside, whether they will be moving to the area, and where they will choose to live if relocating. However, up to two workers total, with a total payroll of up to **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION** could live in the Town of Root or the Town of Canajoharie.

Applicant-provided materials and equipment costs were also developed specifically for the Facility. Table 18-6 below presents the total direct expenditures during operation of the Facility.

**Table 18-6. Annual Direct Expenditures, Facility O&M**

Expense Type	Cost (2024\$)
Labor: Technicians	<b>BEGIN CONFIDENTIAL INFORMATION &lt; [REDACTED] &gt; END CONFIDENTIAL INFORMATION</b>
Land Maintenance	\$120,000
Vehicle Maintenance	\$7,500
<b>Total</b>	<b>\$257,500</b>
Notes: Numbers shown may not sum to totals because of rounding. Labor costs are anticipated to increase annually as a result of inflation.	

As shown above, annual O&M costs are estimated to total \$257,500 with **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION** in labor costs. O&M expenditures are anticipated to be primarily made in the region. Over a period of 35 years, at total of 70 FTE local jobs will be generated by the Facility, with a payroll of approximately **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION**, in 2024 dollars, over that time. Income from Facility jobs and from those companies supported by O&M spending will percolate through the regional economy and in turn support other local businesses.

The Applicant intends to support businesses in the Towns to the extent practicable. It is premature though to select specific vendors in advance of the Facility’s permitting and commencement of construction. Some or all these expenditures, however, may be made in a neighboring community or elsewhere in the region. An initial review of landscaping and automotive repair businesses has identified limited opportunities for the Applicant to use suppliers in the Towns. However, potential suppliers elsewhere within the region may be owned by or employ residents of the Towns. Further,

at the time the Facility's operations commence, the Applicant may identify additional local businesses that can provide landscaping or vehicle maintenance services. At this time, the Applicant anticipates up to **BEGIN CONFIDENTIAL INFORMATION < [REDACTED] > END CONFIDENTIAL INFORMATION** in landscaping and vehicle maintenance service expenditures may be made in the vicinity of the Facility annually.

Additional contributions associated with the Facility are solar leases, easement agreements, and neighbor agreements to local residents and landowners which will continue throughout the life of the Facility. Lease payments provide owners of agricultural lands a steady stream of income that can provide needed security against fluctuating commodity prices and support continued farming in the vicinity of the Facility Site.

#### **1(d) School District Impacts During the Construction and Operation Phases**

The Facility is located within the Canajoharie Central School District (CSD). The largest jobs-related impact would be during the construction period. It is not anticipated that families will relocate for short-term construction jobs. Further, it is anticipated that some portion of the workers during the Facility's construction and O&M phases will be hired from within the Mohawk Valley Economic Region so relocation would not be necessary. During the operation of the Facility, two FTE employees are anticipated to be hired. While the local school districts could enroll a few new students as a result of O&M workers relocating, the impacts are anticipated to be minimal. Negative impacts to the school district, therefore, are not anticipated during the construction and operation of the Facility. PILOT payments are anticipated to be paid to the Canajoharie CSD during the O&M phase of the Facility as discussed in section 18(g) below.

#### **1(e) Municipal, Public Authority, and Utility Services Impacts during the Construction and Operation Phases**

As previously described, impacts to local communities during the construction and operation of the Facility are expected to be negligible. Furthermore, the cost of any services required by the two onsite employees would be more than offset by property taxes (or PILOT payments) and the applicable service fees.

It is not anticipated that Facility construction and operation will place any burdens on community services but will likely generate PILOT revenue and/or payments from the HCAs for the taxing jurisdictions. As detailed in the Facility coordination log (Appendix 2-3), the Applicant has

consulted with staff from the Towns and Montgomery County. The Applicant has also consulted with a variety of local entities as outlined in the Facility coordination log. Separate consultations have been held and input solicited from local agencies, including the highway department, first responders, and fire departments. None of these entities have identified incremental costs that would be incurred as a result of the Facility's construction or operation. Solid waste disposal will be managed by the Facility. Emergency services are not anticipated to experience additional burdens as a result of the Facility, as described in Exhibit 6, Section 6(e).

As described in Exhibit 16, Section 16(c)(1), the Applicant anticipates entering into Road Use Agreements with the Towns and County concerning repairs to any roads damaged by construction of the Facility. These agreements will include any weight restrictions or truck restrictions on roadways. Thus, no net burden will be placed on the Towns or County in terms of highway/roadway maintenance.

#### **1(f) Designated Tax Jurisdiction, Tax and Payment Impacts**

The Facility footprint is within three taxing jurisdictions that are expected to receive PILOT revenues or payments as part of an HCA. The jurisdictions are:

- Montgomery County
- Town of Root
- Town of Canajoharie
- Canajoharie CSD

The above taxing jurisdictions may benefit from a PILOT agreement, or an HCA as described in the following section, and from additional economic activity in the vicinity of the Facility. New York State is also anticipated to benefit from additional tax revenue generated by the Facility's construction and O&M. The Applicant will pay property taxes to the Towns, County, and School District for the remainder of its useful life after any potential PILOT or HCA periods.

#### **1(g) Host Community Benefits**

It is expected that execution of PILOT agreements with Montgomery County and the Canajoharie CSD will require annual PILOT payments for 20 years, with an HCA agreement to be executed with the Towns. Although the specific terms of the PILOT agreement and HCAs have not yet been negotiated, it is expected these agreements will increase the revenues of the taxing jurisdictions and will represent a significant portion of their total tax levy. Additionally, all residential utility

customers in the Towns will receive an annual utility bill credit. A total of \$150,000 in bill credits will be distributed annually for the first 10 years of the Facility operation, totaling \$1.5 million over the life of the program.<sup>1</sup>

For the purposes of this Exhibit, total PILOT and HCA payments over the 20-year agreement period are estimated to be **BEGIN CONFIDENTIAL INFORMATION** [REDACTED] **> END CONFIDENTIAL INFORMATION** Table 18-7 below details the estimated PILOT and HCA payments to each taxing jurisdiction.

**BEGIN CONFIDENTIAL INFORMATION <**

**Table 18-7. Approximate Cumulative PILOT and HCA Payments for Facility**

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

**> END CONFIDENTIAL INFORMATION**

The Canajoharie CSD is anticipated to receive **BEGIN CONFIDENTIAL INFORMATION** [REDACTED] **> END CONFIDENTIAL INFORMATION** Payments to Montgomery County are anticipated to total approximately **BEGIN CONFIDENTIAL INFORMATION** [REDACTED] **> END CONFIDENTIAL INFORMATION** The Towns of Canajoharie and Root are anticipated to receive **BEGIN CONFIDENTIAL INFORMATION** [REDACTED] **> END CONFIDENTIAL INFORMATION** As mentioned previously, after the PILOT agreements and HCA expire, the Applicant will pay property taxes to the jurisdictions for the remainder of its useful life.

---

<sup>1</sup> Case 20-E-0249, In the Matter of a Renewable Energy Facility Host Community Benefit Program, *Order Adopting a Host Community Benefit Program* (issued Feb. 11, 2021) (“Host Community Benefit Program Order”).

As a result of the Applicant's approximately **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** capital investment, an estimated 121 FTE direct jobs will be created during the construction phase. Some of these jobs may be filled by residents of the Towns, although the hiring of workers will depend on the availability of qualified labor at the time of construction. The Applicant's spending during construction is expected to result in increased spending in the Towns and in neighboring areas in which the residents of the Towns may work or own businesses. Facility-related spending will generate additional jobs and income through business-to-business (indirect) spending. Induced impacts to jobs and income will be generated from spending by workers whose jobs result from direct or indirect impacts of the Facility's construction. The Town's residents working or owning businesses in the region are also anticipated to benefit from such indirect and induced spending.

During O&M of the Facility, 2 employees will be supported annually. The Applicant will encourage contractors to hire qualified labor from the surrounding areas to the extent available. These workers may currently live in the Towns or may choose to relocate to be closer to the Facility. Additional positive indirect and induced impacts to jobs and income will occur as a result of ongoing spending by the Applicant, the jurisdictions receiving tax revenues,<sup>2</sup> participating landowners receiving additional lease, easement, or neighbor agreement income from the Facility, and the residents who have increased discretionary income as a result of electricity credits. Such spending will benefit the owners and workers of the Towns' businesses.

### **1(h) Comparison of Fiscal Costs to Jurisdictions**

As previously discussed, fiscal costs related to the services provided by the taxing jurisdictions are not anticipated. Construction phase employment will be temporary and is not expected to result in the relocation of families. O&M job-related impacts are relatively small. With the expected payments associated with the PILOT agreement and the HCA, the Facility should result in positive fiscal impacts for the jurisdictions. After the 20-year PILOT and HCA period, the Applicant will pay property taxes to the jurisdictions for the remainder of its useful life.

---

<sup>2</sup> If the jurisdictions lower taxes as a result of the revenues received from the Facility's tax or HCA payments, discretionary spending by residents and businesses would be expected to increase.

### **1(i) Analysis of Local Emergency Response**

Exhibit 6, Section 6(c), outlines safety and security for the Facility. The Safety Response Plan (SRP) in Appendix 6-2 provides detailed information regarding the emergency response procedures for possible contingencies. The SRP includes information on local fire departments and police/sheriff departments/offices. In the event of an emergency, the Site Manager will assess the situation and perform the proper actions and procedures as outlined in the SRP. These actions may include evacuation and contacting emergency services.

The Facility SRP was shared with the appropriate emergency response teams. The emergency response teams have been given an opportunity to review these plans, ask questions, and provide suggestions. Coordination with fire, police, and other emergency services is important and the Applicant will continue to work to ensure that they are kept updated on the status of the Facility's development.

The Applicant will work with emergency responders to coordinate annual trainings and any other training that may be necessary. Based on the consultations to date, the fire departments and other first responders have not identified any additional equipment, training, or capacity that would be needed to respond to emergencies at the Facility either during the construction or operation of the Facility. Therefore, no infrastructure costs related to the SRP would be borne by the Town or County.

### **1(j) Consistency with State Smart Growth Public Infrastructure Criteria**

As the Facility is a privately funded energy project, it is not subject to New York Environmental Conservation Law (ECL) Article 6, Section 107 (ECL Section 6-107) requiring the construction of new or expanded "public infrastructure" to meet certain Smart Growth Criteria. New York State's Smart Growth Public Infrastructure Policy Act outlines 10 criteria for evaluating public infrastructure. An additional criterion was added at a later date. The Facility's consistency, although not required, with Smart Growth Criteria is addressed below for illustrative purposes. Under the statute, state infrastructure agencies shall not approve, undertake, or finance a public infrastructure project, unless the project, to the extent practicable, meets the relevant criteria set forth in the document (ECL Section 6-107).

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

The Facility will improve New York State's existing energy infrastructure by creating an economically viable, solar-powered electrical-generating facility that provides renewable energy to the New York State power grid and will generate 300 megawatts (MW) of renewable energy that will be provided to the New York State electric system that is managed by the New York Independent System Operator (NYISO).<sup>3</sup> The Facility will use the existing electric system for the distribution of electricity to end users. The conveyance of equipment and construction materials will use existing transportation infrastructure. Long-term impacts to the transportation infrastructure are not anticipated.

Based on the contribution to the New York State electric system and the limited use of transportation infrastructure, the Facility is consistent with Smart Growth Criteria 1.

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

New York State's Smart Growth Public Infrastructure Policy Act defines "municipal centers" 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 (ECL Section 6-107),

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 (ECL Section 6-107).

---

<sup>3</sup> NYISO manages New York State's electric grid and its competitive wholesale electric marketplace.

Large land areas are required for the development of solar power projects. Therefore, solar projects, such as this, are incompatible with municipal centers. Therefore, this criterion is not applicable 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**

Solar projects are incompatible with infill development and waterfront revitalization due to large land area requirements. The Facility is not located in a designated brownfield area. Therefore, this criterion is not applicable to the Facility. Also, siting a utility-scale solar project requires access to a Point of Interconnection (POI) and willing landowners in order to provide the electricity generated to the electric system that is managed by the NYISO.

**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 archeological resources**

The Facility is consistent with Criterion 4. The potential effects on agricultural land, forests, surface and groundwater, recreation and open space, scenic areas, and significant historic and archaeological resources are analyzed in Exhibits 3, 8, 9, and 13 and related studies. These analyses illustrate that the Facility has avoided and/or minimized impacts to the relevant resources to the maximum extent practicable. Any remaining impacts are outweighed by the benefit of enhanced state air quality provided by the Facility's generation of 300 MW of renewable energy.

**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 proposed Facility is in the rural communities of the Town of Canajoharie and the Town of Root in Montgomery County. The area is not currently proposed for mixed land uses, compact development, or the development of diverse and affordable housing in the proximity to places of employment, recreation, and commercial development. Also, significant open space requirement is incompatible with downtown revitalization. The location is also not in a brownfield. Criterion 5

is therefore not applicable to the Facility. Additionally, siting a solar project requires access to a POI and willing landowners in order to provide the electricity generated to the electric system that is managed by the NYISO.

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

The Facility will not be designed to impact transportation choices in the area. Therefore, this criterion is not applicable to the Facility.

**Criterion 7: To coordinate between state and local government and intermunicipal and regional planning**

The Applicant has been involved in public outreach to relevant governmental and planning agencies throughout the development and review of the Facility, in accordance with the requirements of the 94-c regulations. The stakeholder list and information on the public coordination efforts are included in Exhibit 2 and its appendices.

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

The Applicant has conducted stakeholder outreach throughout the development and review of the proposed Facility. These efforts include stakeholder consultation and other forms of engagement, public education, public meetings, ample notification periods, and public comment periods at key milestones (see Exhibit 2 for more information). Further information is also available to the community via the website [https://cordeliopower.com/project/flat\\_creek/](https://cordeliopower.com/project/flat_creek/). 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 Montgomery County and the Town of Canajoharie and the Town of Root. Therefore, this criterion does not apply to this Facility.

**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**

A renewable energy source, such as solar power, generates electricity without the by-product of greenhouse emissions and can reduce the dependence on conventional power plants, thereby reducing the emissions of conventional air pollutants. New York State's goals of having 70 percent of energy generation produced from renewable energy sources by 2030, an 85-percent reduction in greenhouse gas (GHG) emissions from the 1990 level by 2050, and carbon-free generation of electricity by 2040 (Climate Leadership and Community Protection Act [CLCPA] of 2019) will be assisted by the Facility. As this Facility will expand New York State's clean, renewable energy infrastructure and reduce GHG emissions, the Facility is consistent with and will help New York State achieve its goals in Criterion 10.

**Criterion 11 (effective March 21, 2015): 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. A zero-emission, renewable energy source, such as solar power, not only expands available power generation capabilities without increasing GHG emissions, but the addition of a solar power project will result in a decrease in existing GHG emission levels, as solar power displaces generation from fossil fuel facilities. As such, the Facility is expected to have a positive impact on the mitigation of future physical climate risk, thereby supporting Smart Growth Criterion 11.

### **1(k) Host Community Benefits Provided by the Applicant**

The Facility will generate an estimated **BEGIN CONFIDENTIAL INFORMATION** [REDACTED] **> END CONFIDENTIAL INFORMATION** in total revenue for Montgomery County, the Towns, and the Canajoharie School District over a 20-year period, in the form of anticipated PILOT and HCA payments. After the anticipated 20-year PILOT and HCA period, the Applicant will continue to pay property taxes for the remainder of its anticipated 35-year life. This revenue will allow taxing

jurisdictions to undertake needed community improvements and/or lower tax rates, as the Facility will not require the jurisdictions to provide additional services or resources.

The Facility will provide the Towns' residents with electric utility bill credits for the first 10 years of its operation. The credits will total \$150,000 annually, based on \$500 per MW of capacity. Over the 10-year period, a total of \$1,500,000 in credits will be given.

As a result of the Applicant's approximately **BEGIN CONFIDENTIAL INFORMATION** < [REDACTED] > **END CONFIDENTIAL INFORMATION** capital investment, an estimated 121 FTE direct jobs will be created during the construction phase. It is anticipated that some of these jobs will be filled by residents of the Towns; although, the hiring of workers will depend on the availability of qualified labor at the time of construction. The spending during construction is expected to result in increased direct spending in the Towns and in neighboring areas in which residents of the Towns may work or own businesses. Facility-related spending will generate additional jobs and income through business-to-business (indirect) spending. Induced impacts to jobs and income will be generated from spending by workers whose jobs result from direct or indirect impacts of the Facility. Residents of Host Towns who work or own businesses throughout the region are expected to benefit from the direct, indirect, and induced spending generated by the Facility's construction.

During the Facility's O&M, two employees are expected to be supported annually. The Applicant will encourage contractors to hire qualified labor from the surrounding areas to the extent available. The Applicant anticipates signing a Memorandum of Understanding with a local labor union and plans to use as much in-state labor as possible during the construction period. Some of these workers may reside in the Town. Additional positive indirect and induced impacts to jobs and income will occur as a result of ongoing spending by the Facility, the jurisdictions receiving tax revenues,<sup>4</sup> and the residents who have increased discretionary income as a result of electricity credits. Such spending is anticipated to benefit the Town's business owners and workers.

---

<sup>4</sup> If the jurisdictions lower taxes as a result of the revenues received from the Facility's tax or HCA payments, discretionary spending by residents and businesses would be expected to increase.

## References

Bureau of Labor Statistics (BLS). 2024. Local Area Unemployment Statistics. Available at: <https://www.bls.gov/lau/#data>. Accessed June 2024.

The Solar Foundation. 2019. *National Solar Jobs Census 2018*. Available at: <https://irecusa.org/resources/national-solar-jobs-census-2018/>. Accessed August 2023.

U.S. Census Bureau. 2023. 2018-2022 American Community Survey 5-Year Estimates. Available at: <https://data.census.gov>. Accessed December 2023.