

August 25, 2023

VIA EMAIL

Jeffrey Willis, Executive Director
Rhode Island Coastal Resources Management Council
Stedman Government Center
Suite 116, 4808 Tower Hill Road
Wakefield, RI 02879-1900

Subject: File No. 2021-07-005, CRMC Assent No. B2021-07-005 Revolution Wind, LLC

Dear Executive Director Willis:

Revolution Wind, LLC (Revolution Wind) is pleased to submit its proposal to have Environmental Resources Management, Inc. (ERM) serve as the Third-Party Environmental Inspector (TPI) to the Rhode Island Coastal Resources Management Council (CRMC) for the Revolution Wind project offshore construction. Pursuant to CRMC Assent No. 2021-07-005 (the Assent), the TPI will monitor environmental compliance during all offshore construction activities associated with Revolution Wind (Staff Stipulation M). As required by the Assent, Revolution Wind respectfully requests that the Council ratify the selection of ERM to serve as TPI for the offshore work associated with its project. We have attached information, as described below, demonstrating ERM's qualifications to serve as TPI.

In addition, Revolution Wind is pleased to recommend Mr. Todd Corayer to serve as the third-party fisheries representative under Staff Stipulation S of the CRMC Category B Assent dated May 5, 2023. Mr. Corayer has extensive experience in Rhode Island waters working as a deckhand on commercial fishing boats, has logged thousands of trips as a recreational fisherman, and has operated aquaculture leases in Narragansett Bay. He is also a well-respected fishing journalist, experienced in disseminating information to wide audiences. As required by the Assent, Revolution Wind respectfully requests that the Council ratify the selection of Mr. Corayer to serve as the third-party fisheries representative.

As we discussed previously, Revolution Wind will submit a Cable Burial Work Plan (Stipulation A) for review and approval later this year as Revolution Wind gets closer to the start of cable installation. Revolution Wind also will submit the Cable Burial Work Plan (Stipulation F) to CRMC and the Rhode Island Department of Environmental Management later this year in accordance with the Assent.

The attached package is broken down into two Sections.

- Section One:
 - Attachment A: Detailed Overview and Statement of Qualifications of ERM to serve as the proposed Third-Party Environmental Inspector; and
 - Attachment B: Proposed Fisheries Representative resume.
- Section Two: Revolution Wind's Compliance Implementation and Management Plan (Plan).
 - The Plan establishes a framework to monitor compliance with Revolution Wind's permit conditions, which authorize the construction, operation, and maintenance of Revolution Wind, as well as all other associated environmental permits and approvals, including all



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onshore and offshore aspects of Category A and Category B CRMC assents. Please note: this Plan has been updated with the Environmental Inspector role (Section 3.5.2) as well as the Fisheries Representative role (Section 3.5.4)

Thank you for your time regarding Revolution Wind's request. Please do not hesitate to contact Megan Eakin, Permit Manager for Revolution Wind, at MEGEA@orsted.com or (857) 275-1462 with any questions or if additional information is needed regarding the submitted proposal.

Section 1: Attachment A – ERM Statement of Qualification

INTRODUCTION

Environmental Resources Management, Inc. (ERM) is pleased to submit this proposal to Revolution Wind, LLC (Revolution Wind), an affiliate of Orsted Wind Power North America LLC (Orsted) in response to the solicitation of qualifications and proposed budget for Independent Environmental Construction Monitor services for the Revolution Wind Project.

It is understood that this proposal is to provide an Environmental Monitor(s) (EM), independent of the Revolution Wind team, that will report directly to the Rhode Island Coastal Resources Management Council (RI CRMC). The EM will perform compliance monitoring and reporting to RI CRMC during horizontal directional drilling (HDD) and installation of the export cable. Specifically, the EM will conduct monitoring of construction activities in accordance with the project permit requirements, including the Category B Assent and Water Quality Certificate/Dredge Permit. The EM will remain independent from the Revolution Wind.

Why ERM

ERM supports the offshore wind industry from the pre-lease stage through project approval, construction, operation, and decommissioning. ERM provides full capital project support for the largest and most complex renewable energy projects around the globe. ERM leverages the “lifecycle” approach to projects when working with our clients to minimize the time required for securing regulatory permits and expedite the construction schedule to improve the return on investment of capital projects.

We understand that the goals during project construction are to maintain compliance with the terms and conditions of project permits while completing construction on time and within budget. We also know that successful construction projects require compliance monitoring staff who are not only knowledgeable but integrate with the construction team to work toward these goals. Critical success factors for this project will be:

- Wide cross-section of relevant expertise in a local team, ready to mobilize and remain dedicated to this project throughout the duration of construction. ERM can provide the benefit of a team of staff who are knowledgeable in all aspects of the permit requirements as well as marine/vessel safety and effective compliance tracking to ensure seamless and fast communication of issues and remedies.
- Monitoring staff who have experience working with construction equipment, both onshore and offshore, understand the potential impacts of submarine cable construction, are well versed in permit conditions, and are efficient, articulate communicators.
- Strong relationships with federal and state regulators in the Northeast.
- Local presence and experience living and working in Rhode Island. Members of our proposed team have worked with clients in these states for over 15 years, conducting a variety of cultural and biological baseline studies, biological clearance surveys, and other environmental projects, as well as operational permit compliance across a variety of power-sector clients in New England. Our staff are knowledgeable about the cultural history of the area, the habitat and species, as well as the overall regulatory environment in the state of Rhode Island.

ERM has helped renewable energy clients evaluate, acquire, permit, and develop hundreds of generation facilities across the globe and has a deep understanding of the environmental, economic, social, and political issues associated with developing and managing energy infrastructure. ERM has the capabilities and capacity to support the full suite of environmental and permitting compliance services associated with large capital project development. ERM has assisted clients with local, state, and federal permit development for energy generation projects nationwide, including with repeated success in New England.

ERM supports various industries in New England with ongoing compliance support and project management of construction and operation-phase compliance requirements. ERM provides a local team based in Rhode Island with deep expertise in the areas of critical concern to the Revolution Wind project, including protected species, water quality/sediment management, and vessel safety.

Depth and Breadth of Offshore Wind Experience

ERM is a global leader in environmental and social impact assessments. Our offshore experience includes extensive procedural knowledge of the Bureau of Ocean Energy Management's (BOEM) requirements and preferences, including first-party and third-party work, and technical subject matter expertise. ERM offers a tremendous resume of relevant project experience, including support for the development of offshore wind generation not only in the U.S., but also globally. ERM's offshore wind experience in the U.S. includes the Vineyard Wind 1 Project, New England Wind Project, Coastal Virginia Offshore Wind Project, and US Wind Project. In addition, we have supported numerous other offshore infrastructure projects. ERM brings a unique skillset to the evaluation of offshore and onshore wind development projects experience in the U.S. including:

- Preparation of applications for and environmental documentation of wind energy projects, power and fiber optic cables, and marine and coastal infrastructure.
- U.S. permitting and licensing experience with coastal and offshore environments, along with consulting support for the development of numerous offshore wind projects in the UK and Europe.
- Permit compliance support, including management systems development and compliance tracking, for ongoing offshore wind construction projects in the Northeast.
- Completion of baseline studies, including studies specifically within the southern New England area; as well as project-specific experience on East Coast-based offshore wind projects and other offshore infrastructure projects.

ERM has more than 3,000 professionals across multiple offices in the U.S. Our U.S. offices include personnel with local knowledge and experience, as well as working relationships with the regulators, community leaders, and the public. This proximity of resources, combined with local knowledge, has proven valuable for efficiency and responsiveness on similar fast-paced projects.

ERM'S CAPABILITIES AND PROPOSED APPROACH

Federal and State Agency Experience in New England

With a local presence since the early 1990s and over 140 staff based locally in Rhode Island, Massachusetts, and Connecticut, ERM has deep knowledge of the state and local permitting framework in Rhode Island. ERM's team has a long history of working closely with state coastal resource programs in New England, and can support successful construction of the project in compliance with the permit conditions. The ERM team proposed to support the Revolution Wind project is all based locally in New England and has supported a variety of capital projects, including submarine cable permitting, marine terminal redevelopment and operational compliance, solar and wind permitting, and construction compliance. A summary of select relevant New England experience is below and additional project experience is provided in Appendix A.

Table 1: Summary of Select Federal and State Agency Experience in New England

Project Name/Location	Description	Relevant Tasks
Vineyard Wind 1 Project, Environmental Compliance, Massachusetts	ERM is developing and supporting an environmental compliance program for the Vineyard Wind 1 Offshore Wind Energy Project. ERM is preparing the environmental management and compliance program to manage over 2,000 permit compliance items that have been issued by various state, federal, and local entities for the Project. The Environmental Management Plans will govern the construction and operation of the Project in coordination with the requirements of the client and the client's engineering, procurement, and construction teams. ERM is also outlining procedures for compliance assurance through inspections, audits, training, and other required or recommended engineering and administrative controls.	<ul style="list-style-type: none"> ▪ Offshore wind construction compliance, permit condition tracking ▪ Digital management system development ▪ Environmental management plans for each construction package ▪ EHS training/auditing ▪ Development of compliance action plans
Vineyard Wind 1 Project, Environmental Impact Statement, Massachusetts	ERM served as an extension of BOEM in preparation of the EIS. The DEIS, published in December 2018, assessed the potential environmental, social, economic, historic, and cultural impacts that could result from the construction, operation, maintenance, and decommissioning of the Project. The SEIS, published in June 2020, analyzed reasonably foreseeable effects from an expanded cumulative activities scenario for offshore wind development (including numerous potential offshore wind projects nearby), previously unavailable fishing data, a new transit lane alternative, and other changes since publication of the DEIS. The FEIS, published in March 2021, incorporated analyses from the SEIS, and addressed public and agency comments on the DEIS and SEIS.	<ul style="list-style-type: none"> ▪ Impact analyses of the full lifecycle of the offshore wind project including onshore infrastructure ▪ Biological Assessments ▪ Essential Fish Habitat Assessments ▪ Stakeholder engagement
Neptune Deepwater LNG Port (DWP) Decommissioning, Massachusetts	The client engaged ERM in 2022 to develop a decommissioning strategy with an aggressive client schedule that included mobilization to begin removal in 2025. Only one DWP has been decommissioned in U.S. history, which means intensive regulatory engagement as well as uncharted scope. The project would involve removing the DWP platform and several miles of pipeline on the seabed. The decommissioning will impact both state and federal waters.	<ul style="list-style-type: none"> ▪ Vessel safety ▪ Construction monitoring ▪ Submarine cable/pipeline removal ▪ MA Coastal Zone Management ▪ Section 401 Water Quality Certification (WQC) Permitting
Weaver's Cove LNG Terminal, Massachusetts	ERM was engaged to provide pre-application design studies and permitting support for construction of a LNG terminal in the port of Fall River, MA. As part of the pre-design work, ERM performed sediment/dredging assessments, community engagement, Phase 1 and 2 Environmental Site Assessments, pre-application engagement with the local government, CZM, and MassDEP.	<ul style="list-style-type: none"> ▪ Sediment management/monitoring ▪ MA Coastal Zone Management ▪ WQC Permitting ▪ Stakeholder engagement
Amite Cable, Massachusetts	ERM provided Federal, State, and local permitting, as well as stakeholder engagement services, for a trans-Atlantic submarine data cable landing in Lynn, MA. The project included incorporation of local fisheries industry stakeholder input, sensitive cultural resources, and challenging construction conditions at the landing location.	<ul style="list-style-type: none"> ▪ Permitting of submarine fiber line and the HDD ▪ Local Conservation Commissions ▪ MA coastal Zone Management ▪ Fisheries liaison ▪ WQC ▪ USACE

Resource Specialists/Monitors

ERM has a deep bench of botanists, wildlife and vegetation habitat specialists, avian specialists, marine biologists, threatened & endangered species biologists, and coastal resources experts. Our Resource Specialists are highly effective and experienced when it comes to working alongside construction personnel and reducing or eliminating delays stemming from monitoring requirements or unanticipated discoveries. During construction, ERM can support the Revolution Wind project in addressing permit and regulatory requirements relative to protected resources by leveraging our local biologists and environmental staff from our Rhode Island and Massachusetts teams. The experience and certifications of the ERM team include:

- National Marine Fisheries Observers
- Marine Mammal Observers
- Threatened & Endangered Species Biologists, including protected aquatic species native to Rhode Island
- Marine and coastal zone experience in New England
- Rhode Island Principal Investigator for archaeological resources
- National Parks Service Qualified Archaeologist

Offshore Environmental, Health, and Safety (EHS) and Vessel Safety Requirements

ERM has extensive experience providing environmental, health, & safety training programs for a variety of large-scale construction projects and, if requested, can assist in training management and construction contractor certification tracking for the Revolution Wind project. ERM leverages a variety of knowledge-sharing platforms to make certain all team members have access to pertinent EHS compliance documents throughout the project. ERM can facilitate and track individual worker compliance with applicable EHS training requirements. The ERM team has extensive experience in marine/vessel safety and has the certifications and medical clearances required to support the construction team, including:

- Certifications, relevant historical certifications, and medical clearances of the proposed team include:
 - BOISET
 - STCW '95 Certified (expired)
 - 40-Hour Basic/Advanced Fire Fighting (pending renewal)
 - USCG License – 3rd Assistance Engineer (expired)
 - USCG Medical Clearance (pending renewal)
- Relevant vessel safety experience includes:
 - Maritime law and fisheries enforcement.
 - Contractor induction, training program management, and onsite safety performance monitoring.
 - Tracking USCG training and medical “Fit for Duty” documentation.
 - Hazard analysis and control.

ERM's Health and Safety professionals are well-versed in the complex risk environment of maritime work and can provide leadership, training, and compliance support for all aspects of environmental, health, and safety compliance at sea. ERM's team currently holds, or is able to quickly re-certify, the necessary certifications, and has staff who are experts in preparing and delivering worker training and vessel safety

and refueling compliance programs. ERM has provided Marine Safety and Compliance Support for capital projects of similar scale and complexity in the Northeast U.S. and, through that role, has helped clients achieve immediate reductions in risk. If requested, ERM can provide a variety of EHS support around maritime and vessel safety, including:

- Preparation of aquatic safety plans, to cover all aspects of maritime work, including diving operations, construction, and offshore platform work.
- BOSIET – trained Subject Matter Experts to provide critical operational, safety, and technical guidance across a broad array of aquatic activities.
- Marine assurance plans including best practice procedures for shipboard refueling operations, safety/procedure drills, emergency action plans, and incident reporting resources.
- Fatigue management planning tracking and documentation for all crewmembers, with specific time restrictions and waiver processes.
- Risk assessment workshops for projects greater than seven days at sea, work in sensitive habitats, or around UXO.

Construction Compliance Monitoring & Reporting

ERM is a market leader in developing and implementing compliance programs to assist state and federal regulatory agencies in monitoring project compliance with statutory requirements, project-specific permit conditions, and project commitments.

Areas of Expertise:

- Facilitating the timely resolution of compliance-related issues in the field to help keep the project schedule on track;
- Providing information to the lead regulatory agencies regarding noncompliance issues, and other agencies as authorized, to help expedite resolution;
- Reviewing and tracking construction-related variance requests to verify project compliance; and
- Implementing a system for storing the information collected during the environmental compliance monitoring program in a format that allows easy retrieval and search functions.

ERM has experience developing and using a variety of online platforms for compliance reporting that are easy for field staff to use and can generate project-specific reports, automated emails, Teams notifications, and perform other tasks essential to compliance reporting, including tracking and resolution of issues. All the data collected is stored online in the cloud and we can, if requested, design dashboards and other web maps to both QC the data and get at-a-glance metrics. Our Environmental and Resource Monitors are equipped with computers to enable them to draft reports while in the field and transmit urgent data in a timely manner.

ERM's Approach to Successful Compliance Management

- **A Qualified Team.** ERM's approach to environmental compliance management starts with assembling a qualified, experienced team that has worked on similar large and complex projects in the past. Having this experience and knowledge from the start allows our project teams to set up and execute compliance management efficiently.
- **Effective Compliance Tracking.** Our compliance team members familiarize themselves with the project design, layout, and regulatory and permitting requirements. They catalogue and organize a project's regulatory and permit requirements into a compliance matrix organized by pre-construction, during construction, and post construction obligations. The compliance matrix serves as a guide and a checklist to make sure nothing is missed during all phases of a project.

ERM also integrates compliance requirements into electronic reporting systems, so that the broader project team, including RI CRMC, Revolution Wind, ERM, and the construction contractor, can be kept informed while environmental compliance issues are tracked through resolution.

- **Constructive Relationships and Communication.** The team will be familiar with and understand RI CRMC's processes and procedures. It is important to forge relationships with the agency and subcontractor teams, including the construction contractor, early in the process.
- **Maintaining Independence.** As a contractor to Revolution Wind, but reporting directly to RI CRMC, ERM's team would work collaboratively with both the agency and Revolution Wind's Compliance Team, while remaining accountable to RI CRMC.

PROJECT TEAM AND ORGANIZATION

We have assembled a strong team to safely drive results, maintain compliance, provide central management and local delivery, optimize Diverse Supplier participation, and streamline processes and costs. This ERM team brings extensive experience delivering similar work and programs for clients with similar operations. Brief biographies are below, with resumes included in Appendix B. The following text first introduces our Leadership Team, consisting of the Partner-in-Charge and Lead Environmental Monitor, followed by our Project Delivery Team of resource and maritime construction experts.

Team Leadership



Lyndsey Colburn, PG – Partner-in-Charge

Lyndsey is a Partner with over 20 years of experience in development and permitting of capital projects in the Northeast. Lyndsey has a background in geology and is fluent in the federal, state, and local regulatory permitting processes for land development and resource impact assessment. She has experience permitting a variety of projects across New England and New York. Lyndsey's expertise includes permitting strategy development, local/municipal permitting, and project risk analysis. She leverages her years of experience as a member of a local land development board to develop successful permitting strategies for her clients. Lyndsey is adept at building and leading multi-disciplinary teams across a large footprint to provide cohesive and consistent program delivery for ERM's clients. With a focus on renewable energy projects, she has supported successful development of projects across the Northeast by partnering with clients to navigate technical, regulatory, and stakeholder challenges.



Melissa Pierce – Lead Environmental Monitor

Melissa is an experienced Environmental, Health and Safety compliance professional based in Rhode Island with over 12 years of experience working across a variety of industries. As a compliance expert, Melissa has assisted clients in EMIS design and implementation, management system development and maintenance support, developing EHS legal registers and compliance calendars, stormwater permit compliance, stormwater pollution prevention plan development, e-waste recycling auditing, ISO 14001 gap assessments, and air emissions reporting. Melissa manages a large nationwide stormwater compliance program for a global key client. Prior to ERM, Melissa worked as a Marine Meteorologist for Rockwell Collins and as a utility operator for Wheelabrator Millbury, a waste-to-energy facility, and was trained in the US Coast Guard at the Massachusetts Maritime Academy.

Project Delivery Team



Rachel Hickey, Environmental Monitor/Marine Mammal Observer/T&E Specialist

Rachel Hickey is a Consultant with ERM based in Boston, MA. She has over 10 years of experience in environmental resource management, impact assessments, biological surveys, regulatory permitting, nuclear chemistry and project management. Rachel has held responsibility for maintaining compliance with state and federal regulations for permitting environmental releases of an operating nuclear power plant. Rachel also has experience with permitting local, state, and federal ordinances, including the U.S. Army Corps of Engineers, National Pollutant Discharge Elimination

System, and Stormwater Pollution Prevention.



Craig Chartier, Environmental Monitor/Senior Archeologist

Craig Chartier is a SOI-qualified Professional Archaeologist and a Senior Consultant with ERM based in Boston, Massachusetts. He is a member of ERM's Cultural Resource Field Services work group. Mr. Chartier is skillful in developing and implementing effective federal and state-level cultural resource regulatory compliance strategies for complex development projects. He has 30+ years of experience in professional archaeology with a focus on historical archaeology, prehistory, contextual

history, systematic pedestrian survey, Section-106 assessment, technical reporting, mapping, and lab processing. Craig has wide-ranging experience working throughout New England and the Eastern Woodlands and is author, co-author, and editor of numerous technical reports. Craig also has extensive laboratory experience in historic and Native artifact identification, processing, soil sample processing (flotation and composition analysis), faunal and floral analysis, and Native material culture analysis (pottery and lithics) and replication.



Ed Graham, Subject Matter Expert – Vessel Safety & Compliance

Edward has 22 years of experience with the USCG, retiring as a Chief Boatswain's Mate with eight years of sea service and skills including law enforcement, fisheries enforcement, search/rescue, boat/ship/equipment operating, maritime construction and rigging. He served two years as the First Lieutenant aboard the USCG Penobscot Bay supporting marine infrastructure and interests in the North Atlantic region, including emergency icebreaking relief missions along the Saint Lawrence

Seaway in Canada. He has over ten years of experience working on environmental construction management and site remediation oversight projects. His experience includes project management and oversight in a variety of project environments, including offshore, shipyards, barges, and residential areas. He is skilled with providing an interface between project management team and subcontractors.



Heather Heater – NA OSW Lead/Technical Advisor

Heather has been working on offshore wind projects for the past decade. She has nearly 20 years of regulatory experience for numerous projects across the U.S. She led the Vineyard Wind 1 Project EIS, and is serving as the Partner on the Vineyard Wind 1 Project Environmental Compliance. Heather served as the regulatory permitting manager for the Cape Wind Offshore Project. Heather's experience covers a variety of power projects including offshore wind, onshore wind, transmission lines, pipelines, and power generation facilities. She has experience in developing and

implementing regulatory permitting strategies, conducting feasibility and siting studies, and preparing and filing environmental impact statements.

APPENDIX A

Relevant Project Experience

Representative Marine/Coastal Project Experience



Project	State/ Lead Agency	BOEM COP	NEPA Documents and Environmental Permitting	Air Quality	Water Quality	Terrestrial & Coastal Fauna	Birds and Bats	Coastal Habitats	Benthic Resources	Finfish, Invertebrates, EFH	Marine Mammals/ Sea Turtles	Socioeconomics/EJ	Land Use and Coastal Infrastructure	Recreation and Tourism/Visual	Commercial and For-hire Fisheries	Navigation and Vessel Risk	Other Uses	Public Meeting Facilitation	Cultural Resources/ Section 106 Consultation	Construction Compliance	Marine/Vessel Safety	Rhode Island Agency Support
New England Wind Project	BOEM	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•			
Vineyard Wind 1 Project	BOEM	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•		
US Wind Project	BOEM	•	•	•	•	•	•	•				•	•	•	•	•	•	•	•			
CVOW	1 st Party	•																				
Cape Wind Permitting & NEPA Support (Heather Heater personal experience)	BOEM	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•			
Buckeye Wind Farm EIS	USFWS		•	•	•		•						•	•	•	•						
Lonesome Bronco EA	BLM		•			•	•						•		•		•					
Hermosa Wind EA	BLM					•	•															
SPOT Deepwater Port EIS	USCG		•	•	•	•	•	•	•				•	•	•	•	•		•			
LNG 21 Deepwater Port EIS	USCG		•																			
Confidential Project – Construction Support	MT																			•		
St. Lawrence-FDR Hydroelectric EIS	FERC/NYS		•	•	•	•	•			•			•	•	•	•	•					
Northeast Gateway LNG Terminal EIS	USCG		•	•	•	•						•	•	•	•	•	•					
White Wind Farm EIS	WAPA		•	•	•	•	•						•	•	•	•	•					
Hawaiian Monk Seal Research PEIS	NOAA		•	•	•	•	•	•	•	•	•		•	•	•	•	•	•	•			
Floridian Natural Gas Storage EIS	FERC		•	•	•	•							•	•	•	•	•					
Northern Fur Seal Subsistence Harvest EIS	NMFS		•	•	•	•					•											
Neptune Offshore LNG Decommissioning	FERC/MA		•		•				•	•	•									•	•	
Harborside Site Assessment/Remediation	RI																					•
Permitting for Telecommunication Submarine Link	MA		•					•	•	•	•											
Confidential Project – Solar Development Wetland/T&E Permitting Support	RI																					•
Portsmouth SCC	RI																					•
Offshore Met Mast Decommissioning	N/A																			•		
Contractor Safety Training, OSW	N/A																			•		

Additional Construction Monitoring Experience



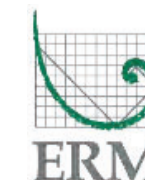
Client/Project Name	Project Description	Location	Description of Services Provided
ALLIANCE PIPELINE LP Alliance Pipeline Project	890-mile natural gas pipeline and seven compressor stations	IA, IL, MN, ND	<ul style="list-style-type: none"> Environmental training Environmental compliance management Post-construction monitoring and reporting Environmental compliance review of operations National Pollutant Discharge Elimination System (NPDES) compliance reporting Compliance audits
ALLIANCE PIPELINE LP Tioga Lateral Project	79-mile 12-inch-diameter natural gas pipeline and new aboveground facilities	ND	<ul style="list-style-type: none"> Environmental inspection
AUX SABLE LIQUID PRODUCTS LP Aux Sable Pipeline Project	8-mile liquids pipeline	IL	<ul style="list-style-type: none"> Environmental training Environmental inspection
BOBCAT GAS STORAGE Bobcat Gas Storage Project	Salt dome cavern gas storage development	LA	<ul style="list-style-type: none"> Environmental compliance plan Environmental training Environmental inspection Environmental compliance management
BP PIPELINES AND LOGISTICS In-line Inspection Services	40+ pipelines	TX, LA, MS, AR, OK, KS	<ul style="list-style-type: none"> Environmental compliance and permitting support programs during in-line inspection
CALEDONIA NIA ENERGY PARTNERS Caledonia Gas Storage Project	Modification of an underground storage cavern, 1 mile of pipeline, and development of aboveground facilities	MS	<ul style="list-style-type: none"> Environmental inspection

Additional Construction Monitoring Experience



Client/Project Name	Project Description	Location	Description of Services Provided
CENTERPOINT ENERGY BAKKEN CRUDE SERVICE, LLC Bear Den Project	68.5-mile crude oil pipeline and 59.4-mile composite produced water pipeline	ND	<ul style="list-style-type: none"> Environmental inspection
COLORADO INTERSTATE GAS Young's Gas Storage Project	Development of an injection/withdrawal well and a gathering line	CO	<ul style="list-style-type: none"> Environmental training
EL PASO Black Warrior Buttahatchie Gas Storage Project	Depleted field converted to a gas storage reservoir	MS	<ul style="list-style-type: none"> Environmental training Environmental inspection
EL PASO TENNESSEE GAS PIPELINE Albany Replacement Project	4,135 feet of natural gas pipeline replacement	NY	<ul style="list-style-type: none"> Environmental field survey Environmental inspection
ENBRIDGE ENERGY System Expansion Project II	460-mile petroleum pipeline	IL, MN, WI	<ul style="list-style-type: none"> Environmental training
ENBRIDGE, INC. 30-Inch Looping Project	110-mile petroleum pipeline	WI	<ul style="list-style-type: none"> Environmental training
ENBRIDGE, INC. Alberta Clipper Project – Canada	Not applicable	Canada	<ul style="list-style-type: none"> Environmental inspection reporting system
ENBRIDGE, INC. Alberta Clipper Project – United States	26 miles of crude oil pipeline	MN, WI	<ul style="list-style-type: none"> Environmental inspection management and technical support
ENCANA OIL & GAS Entrega Gas Pipeline Project	327-mile natural gas pipeline and three compressor stations	CO, WY	<ul style="list-style-type: none"> Environmental training Environmental inspection Environmental compliance management Post-construction monitoring and reporting

Additional Construction Monitoring Experience



Client/Project Name	Project Description	Location	Description of Services Provided
ENTERPRISE PROD UCTS Petal Gas Storage Project	Salt dome cavern gas storage development	MS	<ul style="list-style-type: none"> Environmental training Environmental inspection
ETC TIGER PIPELINE, LLC ETC Tiger Pipeline Project	175-mile natural gas pipeline	LA, TX	<ul style="list-style-type: none"> Third-party environmental compliance monitoring and management
FLORIDA GAS TRANSMISSION COMPANY FGT Phase IV Expansion Project	139-mile natural gas pipeline	MS, FL	<ul style="list-style-type: none"> Third-party environmental compliance monitoring and management
FLORIDA GAS TRANSMISSION COMPANY FGT Phase VIII Expansion Project	483-mile natural gas pipeline	AL, FL	<ul style="list-style-type: none"> Third-party environmental compliance monitoring and management
GOLDEN PASS PIPELINE LLC Golden Pass Pipeline Project	69-mile natural gas pipeline	TX, LA	<ul style="list-style-type: none"> Third-party environmental compliance monitoring and management
GREAT LAKES GAS TRANSMISSION Pipeline Maintenance and Recoating Projects	200 natural gas pipeline maintenance projects; 30 natural gas pipeline recoating projects	MI, MN, WI	<ul style="list-style-type: none"> Compliance program development and implementation Environmental training
GUARDIAN PIPELINE LLC Guardian Pipeline Project	142-mile natural gas pipeline and one compressor station	IL, WI	<ul style="list-style-type: none"> Environmental training Environmental inspection Environmental compliance management Post-construction monitoring and reporting
GUARDIAN PIPELINE LLC Guardian Pipeline Expansion and Extension Project	115-mile natural gas pipeline and two compressor stations	IL, WI	<ul style="list-style-type: none"> Environmental training Environmental inspection Environmental compliance management Post-construction monitoring and reporting

Additional Construction Monitoring Experience



Client/Project Name	Project Description	Location	Description of Services Provided
GULF INTERSTATE ENGINEERING CO. Wisconsin Gas Lateral Line Project	38-mile natural gas pipeline	WI	<ul style="list-style-type: none"> Environmental Inspection
GULFSTREAM PIPELINE Gulfstream Pipeline Project	753-mile natural gas pipeline	AL, MS, FL	<ul style="list-style-type: none"> Third-party environmental compliance monitoring and management
KERN RIVER GAS TRANSMISSION Kern River 2003 Expansion Project	747-mile natural gas pipeline and three compressor stations	CA, NV, UT, WY	<ul style="list-style-type: none"> Third-party environmental compliance monitoring and management
KINDER MORGAN, INC. Cochin Assurance Project (formerly a BP Dome project)	1,200-mile natural gas liquids pipeline	IA, IL, IN, MI, MN, ND, OH	<ul style="list-style-type: none"> Environmental compliance program and manual Environmental training
KINDER MORGAN, INC. SFPP Concord to West Sacramento Petroleum Pipeline Project	60-mile petroleum pipeline conversion	CA	<ul style="list-style-type: none"> Third-party environmental compliance monitoring and management
LAKEHEAD PIPELINE COMPANY Terrace III Project	120-mile petroleum pipeline and two pumping stations	MN, WI	<ul style="list-style-type: none"> Environmental inspection
MAGNUM GAS STORAGE, LLC Magnum Gas Storage Project	Natural gas storage caverns and pipeline	UT	<ul style="list-style-type: none"> Environmental inspection
MINNESOTA PIPELINE COMPANY MinnCan Project	304-mile petroleum pipeline and one pumping station	MN	<ul style="list-style-type: none"> Environmental training Environmental inspection Environmental compliance management Post-construction monitoring and reporting
NV ENERGY Harry Allen Combined Cycle Project	500-megawatt combined cycle utility facility	NV	<ul style="list-style-type: none"> Environmental inspection

Additional Construction Monitoring Experience



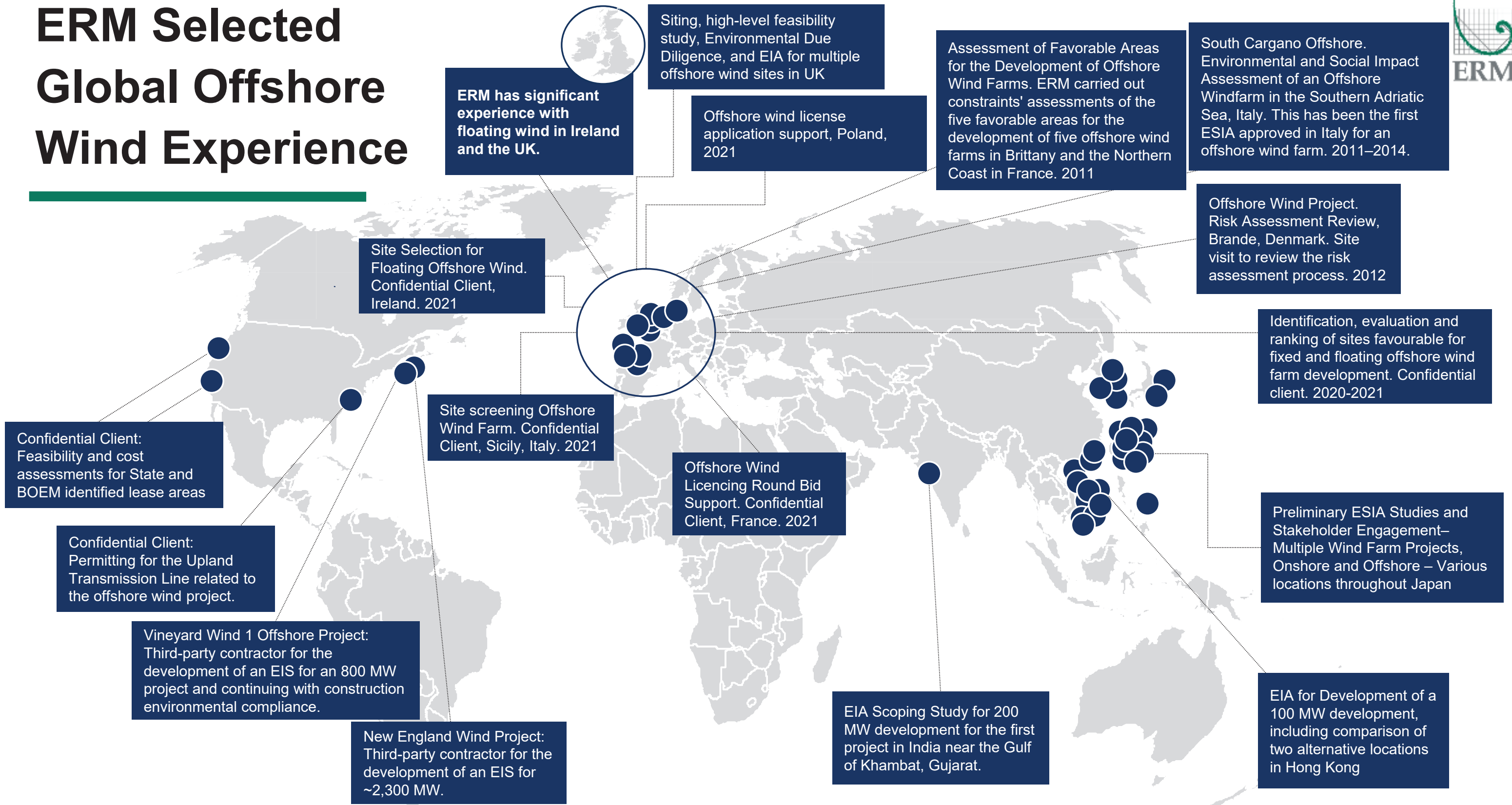
Client/Project Name	Project Description	Location	Description of Services Provided
NV ENERGY ON Line Transmission Line	12 Telecommunication stations located throughout central and northern Nevada	NV	<ul style="list-style-type: none"> BLM post-National Environmental Policy Act construction compliance manuals Environmental inspection Desert tortoise monitoring Sage grouse surveys
ONEOK ONEOK Bakken Pipeline Project	512-mile natural gas liquids pipeline and ancillary facilities	MT, WY, CO	<ul style="list-style-type: none"> Environmental training Environmental inspection
OVERLAND PASS PIPELINE COMPANY, LC Overland Pass Pipeline Project	700-mile natural gas liquids pipeline and three pumping stations	CO, KS, WY	<ul style="list-style-type: none"> Environmental training Environmental inspection Environmental compliance management Post-construction monitoring and reporting
OVERLAND PASS PIPELINE COMPANY, LC Piceance Basin Lateral Project	150-mile natural gas liquids pipeline	WY, CO	<ul style="list-style-type: none"> Third-party environmental compliance monitoring and management
PACIFIC GAS TRANSMISSION COMPANY North Baja Pipeline Project	80-mile natural gas pipeline and one compressor station	CA, AZ	<ul style="list-style-type: none"> Third-party environmental compliance monitoring and management
SOUTHERN NATURAL GAS COMPANY Cypress Pipeline Project	166-mile natural gas pipeline and three compressor stations	FL, GA	<ul style="list-style-type: none"> Third-party environmental compliance monitoring and management
SPECTRA ENERGY Southeast Supply Header Project	270-mile natural gas pipeline and five compressor stations	LA, MS, AL	<ul style="list-style-type: none"> Environmental project management
STARKS GAS STORAGE, LLC Starks Gas Storage Project	Underground salt cavern natural gas storage facility	LA	<ul style="list-style-type: none"> Environmental compliance plan Environmental training

Additional Construction Monitoring Experience



Client/Project Name	Project Description	Location	Description of Services Provided
TRANSCANADA PIPELINES, LTD North Baja Pipeline Expansion Project (Phase I)	2.1-mile natural gas pipeline	CA, AZ	<ul style="list-style-type: none"> Third-party environmental compliance monitoring and management
TRANSWESTERN PIPELINE COMPANY, LLC Phoenix Expansion Project	285-mile natural gas pipeline	NM, AZ	<ul style="list-style-type: none"> Third-party environmental compliance monitoring and management Post-construction monitoring and reporting
VECTOR PIPELINE (ENBRIDGE) Vector Pipeline Project	329-mile natural gas pipeline and two compressor stations	IL, IN, MI	<ul style="list-style-type: none"> Environmental training Environmental construction management Post-construction monitoring and reporting
VIKING GAS TRANSMISSION CO. Grand Forks Lateral Project		ND	<ul style="list-style-type: none"> Environmental training Environmental inspection
WILLIAMS GAS PIPELINE Capacity Replacement Project	75-mile natural gas pipeline replacement project	WA	<ul style="list-style-type: none"> Third-party environmental compliance monitoring and management
WISCONSIN GAS COMPANY Port Washington Lateral	17-mile natural gas pipeline	WI	<ul style="list-style-type: none"> Environmental training Environmental inspection
WISCONSIN GAS COMPANY Wisconsin Gas Lateral Line Projects	34-mile natural gas pipeline	WI	<ul style="list-style-type: none"> Environmental inspection Restoration tracking Post-construction restoration and mitigation support

ERM Selected Global Offshore Wind Experience



APPENDIX B

Key Staff Resumes

Lyndsey Colburn, PG

Partner, Geologist

Lyndsey Colburn is a Partner with ERM in Boston, Massachusetts. She is a consultant with over 22 years of experience supporting clients across a variety of industries, as well as in the role of Managing Partner running one of ERM's largest business units. Lyndsey's expertise includes permitting and regulatory strategy development in support of energy transition and decarbonization. Lyndsey's technical experience includes protected species and wetland resource area permitting, contaminant fate and transport, impacted groundwater and soil investigations, and stakeholder engagement. Lyndsey brings proven experience in leading large, global teams to support critical portfolios for ERM's clients.



Experience: Over 22 years of experience in leading large capital project development and permitting, as well as asset risk management for the power, transportation, aerospace & defense, finance, and technology sectors.

LinkedIn: <https://www.linkedin.com/in/lyndsey-colburn-ba87667/>

Email: lyndsey.colburn@erm.com

Education

- BS, Environmental Geoscience, Boston College

Professional Affiliations and Registrations

- Registered Professional Geologist
- Conservation Commission, City of Medford, Massachusetts, Appointed
- Licensed Site Professionals Association
- OSHA 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Training

Languages

- English, native speaker

Fields of Competence

- Operations Leadership
- Program Development/Management
- Regulatory and Risk Management Strategies
- Bedrock Geology and Groundwater Assessment
- Stakeholder Engagement
- Wetland Mitigation Design & Monitoring
- Environmental Due Diligence
- Contaminated Site Characterization
- Land Development Permitting

Key Industry Sectors

- Power
- Transportation
- Aerospace & Defense
- Technology

Publications

- L. Colburn, G. Demers, K. Hallinger, D. Banks, *Use of Bioavailability and Toxicity Data to Facilitate Change in Record of Decision Under Superfund*, Battelle Conference on Remediation and Management of Contaminated Sediments, January 2015

Key Projects

Permitting for 8 Site Utility-Scale Solar Portfolio – Massachusetts

Developed permitting strategy for multiple utility-scale solar energy facilities across Massachusetts. Partnered with the client to map permitting timelines, engage local communities and leadership in the permitting process, and ultimately secure federal, state, and local permits in support of development, including MEPA, Massachusetts Wetlands Protection Act (WPA), Section 106, T&E species mapping/clearance, local planning/zoning, and local wetlands and stormwater permits. Project involved complex stakeholder and property owner relationships as well as historical permit violations on the project parcels, which were managed successfully to closure as part of the permitting process.

Permitting Risk Review for Multi-Site Solar Portfolio – Massachusetts and Rhode Island

Partnered with client to review existing permits, environmental assessments, and mapped resources to identify any risks to project feasibility, location, or layout. Developed actions plans or mitigation measures for any risks identified. Advised client of any permit updates or modifications required.

Major Landfill Closure with Complex Wetland Constraints – Massachusetts

Designed, permitted, and oversaw construction of nearly 30-acres of constructed wetland mitigation, including design of multiple wetland hydrology types and habitats. Worked closely with EPA (Superfund), local and state regulators, as well as property owner to ensure design incorporated stakeholder feedback. Developed long-term monitoring program to monitor native species success, evidence of native fauna, invasive species control measures, and maturation of wetland into habitat types as specified in the design. Permitting process included EPA, Massachusetts DEP, WPA, Bureau of Waste Prevention, local Conservation Commission and Health Department.

Coastal Zone Permitting for Major Energy Port – Massachusetts

Prepared permit applications for construction of on-shore and off-shore moorings for large, natural gas import terminal. Worked with client and state and local Agencies to advance permitting process quickly and meet project timelines, which ensured availability of funds for project development. Permitting Agencies included Army Corps of Engineers, DEP, Massachusetts Historical Commission, Coastal Zone Management, and local Conservation Commission.

Stormwater Compliance Strategy Development - Maine

Addressed storm water compliance issues at Maine's largest locomotive maintenance and repair facility, including review of the site drainage system, recommending specific upgrades, preparation of an engineering assessment, revising the SPCC/ SWPP Plans to comply with applicable regulations, and assisted the railroad in regulatory negotiations with both Maine DEP and EPA.

Superfund RI/FS - Maine

Developed RI work plan for complex contaminated site at former metals recycling facility in Leeds, Maine. Worked with EPA Region 1 and Maine DEP to collaboratively develop site assessment approach to address all stakeholders concerns, including off-site groundwater plume potentially impacted private drinking water wells. Managed data real-time to allow streamlined, cost-effective implementation of site investigation.

Superfund Time-Critical Removal Action - Maine

Worked with key stakeholders to develop characterization and remediation approach for former automobile recycling facility. Lead stakeholder engagement sessions to determine client and agency favorable outcomes and incorporate findings into final selected remedy.

Site Investigation and Risk Assessment - Massachusetts

Designed and implemented extensive bedrock groundwater assessment, including bedrock and borehole geophysical surveys, transducer groundwater investigation, groundwater flow modeling. Developed complex groundwater flow model to facilitate targeted remediation program.

Sediment Ecological Risk Assessment under Superfund - Massachusetts

Reviewed historical site assessment and risk characterization conclusions and developed supplemental bioavailability sampling program to confirm ecological risk. Successfully engaged regulatory agency in re-evaluating Site Risk Management Strategy.

Brownfields Site Redevelopment - Massachusetts

Developed strategy for streamlining environmental monitoring activities in preparation for property redevelopment. Assisted client is successfully transitioning site to new owner for redevelopment as mixed-use property. Serve as liaison between current property owner and state/federal regulatory authorities during redevelopment.

MA Wetlands Protection Act and Endangered Species Act Permitting - Massachusetts

Assist client in permitting commercial development site where state-listed protected species were previously identified. Developed mitigation and management plan for post-construction monitoring of protected plant species.

Environmental Permitting for Brownfields Redevelopment - Massachusetts

Delineated wetland resource areas and conducted native species inventory. Prepared Army Corps of Engineers Programmatic General Permit application, 401 Water Quality Certification application, Massachusetts Natural Heritage and Endangered Species submittals, and WPA permit applications. Developed post-remediation wetland restoration plan.

Successfully represented the project through local/state wetland permitting process.

Emergency Response Petroleum Release to Wetland - Massachusetts

Prepared Army Corps of Engineers PGP Application and Notice of Intent under the Massachusetts Wetlands Protection Act. Developed site groundwater and surface water monitoring program to support state WPA permitting and ultimately receive an Order of Conditions for the project.

Plum Island Federal Animal Disease Center/Wetland Restoration and Monitoring - New York

Developed and implemented monitoring program for constructed wetlands under NYSDEC and EPA as a Supplemental Environmental Project. Conducted annual wetland monitoring and invasive plant species control activities. Assisted the client in closing the wetland monitoring required under the SEP. Developed Long-Term Invasive Species Management Plan.

Confidential Wind Energy Project/Wetland Mapping - New York

Led team of wetland scientists to map wetlands throughout Jefferson County, New York. Developed region-wide resource area mapping to assist in project design and reduce wetland impacts based on wind turbine placement.

Vernal Pool Studies and Mitigation Planning - Massachusetts

Located and mapped vernal pools at a potential commercial development site. Conducted vegetation and biological surveys to identify vernal pool species. Assisted the developer client in avoiding natural vernal pools during future land development.

Melissa Pierce

Principal Consultant

Melissa is an experienced Environmental, Health and Safety compliance professional with over 12 years of experience working in the Oil & Gas, Manufacturing and Technology industries. As a Sustainable Operations consultant, Melissa has assisted clients in EMIS design and implementation, management system development and maintenance support, developing EHS legal registers and compliance calendars, stormwater permit compliance, e-waste recycling auditing, ISO 14001 gap assessments, and air emissions reporting. Melissa manages a large nationwide stormwater compliance program for a global key client. Prior to ERM, Melissa worked as a Marine Meteorologist for Rockwell Collins and as a utility operator for Wheelabrator Millbury, a waste-to-energy facility.



Experience: 12+ years' experience in providing compliance consulting services, especially stormwater compliance and permitting and compliance management systems.

Email: Melissa.Pierce@erm.com

LinkedIn: <https://www.linkedin.com/in/melissa-pierce-0549916/>

Education

- BS Meteorology, Plymouth State University, USA, 2006
- BS Marine Engineering, Massachusetts Maritime Academy, USA, 2003
 - USCG License - 3rd Assistant Engineer Unlimited, 2003 (*expired*)
 - STCW '95 Certified, 2003 (*expired*)
 - Table A-III/1 – Officers in charge of an engineering watch in a manned engine-room or designated duty engineer a periodically unmanned engine room.
 - Table A-VI/1 – Familiarization and basic safety training and instruction for all seafarers.
 - Table A-VI/2-1 – Competence in survival craft and rescue boats other than fast rescue boats.
 - 40-Hour Basic/Advanced Fire Fighting, 2003 (*expired*)

Languages

- English, native speaker

Fields of Competence

- EHS Program Development and Management
- EMIS design and implementation
- Legal Register Development
- Atmospheric Sciences
- Marine Engineering
- NPDES Permitting and compliance
- e-Waste Takeback Auditing

Key Industry Sectors

- Oil and Gas
- Marine
- Technology, Media, and Telecommunications

Key Projects

Sustainable Operations

Confidential Client

Senior Project Manager for the National Stormwater Continued Compliance Program for over 80 Fulfillment Centers in 38 states. Developed Stormwater Pollution Prevention Plans (SWPPP), provided SWPPP training, and assisted sites with federal and/or state NPDES permit applications. Worked with state leads and field staff to support on-site compliance inspections, analytical monitoring, and visual assessment of stormwater.

Confidential Client

Senior Project Manager. Managed a Massachusetts based facility's stormwater compliance program. Provided on-site support for inspections and monitoring as required by the Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activities, provided SWPPP training and assisting with DMR and annual reporting.

Aspen Aerogels

Conducted an OSHA Recordables Review at the facility and learned how Aspen Aerogels is currently defining an OSHA recordable. Completed an EHS Management System Gap Assessment. Activities included facility tour, interview sessions with key personnel, and prepared a memo report to summarize the review and provide information on how elements of the ISO 14001/OHSAS 18001 standards are met and where any gaps exist.

Confidential Client

Senior Project Manager for the Compliance Assurance Management System (CAMS) implementation and sustainment for terminals, pipeline stations, and pipeline systems across the United States. Responsible for all aspects of the CAMS program, including regulation review, facility applicability, and compliance task development.

Sealed Air Corporation

Prepared an air emissions calculation spreadsheet for the industrial packing manufacturing facility in Holyoke, Massachusetts to quantify facility emissions for Source Registration reporting purposes and satisfy recordkeeping requirements in the Facility's Massachusetts Department of Environmental Protection (MassDEP) Plan Approval.

Buckeye Partners, LP

Project Manager. Conducted Semi-Annual Compliance Reports for South Portland and Bangor terminals in Maine. Prepared Maine Department of Environmental Protection (MEDEP) application for renewal of Bangor Terminal's Synthetic Minor Source Air Emission license and South Portland's application for Part 70 Air Emission License.

Confidential Client

Project Manager. Provided Environmental, Health, and Safety (EHS) support as directed by the Client's Corporate Environmental Department. Activities included: developed a Microsoft Access report that generated information that was included in Texas's Pollution Prevention (P2) Plan, developed a data management system used to crunch data from several Distribution Centers (DCs) store tote audit program, and formatted and updated SPCC plans, DC Waste Management Program training documents, and DC Contingency Plans.

Weaver's Cove Energy, LLC (WCE)

Supported the collection, analysis, and reporting of water quality samples collected for WCE's NPDES Permit from the site's two storm water outfalls.

Confidential Client

Project Manager. Conducted quarterly SWPPP inspections, provided annual SWPPP, SPCC, and Environmental Management System (EMS) training to staff, and performed an annual EMS assessment. Other activities included conducting Annual and Semi-annual Compliance Air Reporting and Annual GHG Reporting.

Confidential Client

Project Manager. Conducted Annual and Semi-annual Compliance Air Reporting.

Confidential Client

Project Manager for e-Waste Takeback Audit Program. Activities included, coordinating domestic and international individual site audits, monitoring audit progress, reviewing, and delivering draft and final reports to the client.

Harbor Fuels Oil

Provided annual Hazardous Waste Refresher training to staff, supported quarterly Facility Security Plan (FSP) drills, and conducted an annual FSP audit.

Confidential Client

Provided support in developing an Energy Assessment (EA) Report required under the Boiler/Process Heater MACT standard (40 CFR 63 DDDDD) for several refineries located in the United States. Activities included interviewing key refinery personnel and developing a draft EA Report for approval by the client.

Lifoam

Supported staff in preparing Form R/Form A Toxic Release Inventory (TRI) filing for operations and Tier 2 hazardous material inventory reporting for the Peabody, MA location.

Smith and Wesson

Reviewed and evaluated previously submitted information included in Form R/Form A Toxic Release Inventory (TRI) to identify potential changes or differences in reporting data.

Key Projects

Digital Services

Suncor Energy

Implementation of enterprise-wide Environmental Management Information System (EMIS) design and system enhancements across all corporate assets.

Functionality included data integration and air emission calculations for GHGs, CACs, and listed pollutant species to support reporting for NPRI (multi-media reporting in Canada), Provincial and International requirements, and various public and internal uses. Also included was implementation of water usage and emissions tracking. Created custom Crystal Reports for air and water reporting requirements.

Aera Energy

Designed and configured *opsInfo* to manage the monitoring and reporting requirements of the federal Greenhouse Gas Mandatory Reporting Requirements (MRR) 40 CFR Subpart W – Petroleum and Natural Gas Systems. Activities included developing class templates and model objects to support the mandated calculations; imported historical and current data to generate and verify reports generated out of the system.

Confidential Client

Forecasted tank emissions for Deer Park's BSL PUP (Blend, Storage, and Loading Permit Update Project) amending the New Source Review Permit (NSR). Short and long term scenarios were used for the storage and blend tanks based on number of turnovers, throughput, and a material's maximum and average vapor pressure. Provided client support with running *opsInfo* reports.

Confidential Client

Created report specifications for SQL Server Reporting Services to support the waste management processes within the Essential Suite platform. Process included reviewing existing reports and developing detailed specifications to allow developers to create the reports required for the waste module.

Confidential Client

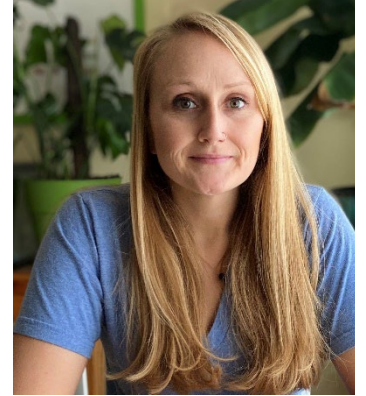
On-site Environmental Reporting Representative for the Deer Park Chemical Plant and Refinery. Responsibilities included managing and generating key HSSE reports, such as Air Emissions Inventory, Toxic Release Inventory, P2 Waste Report,

Community Action Council Report, quarterly Global Performance Management Reporting (GPMR), and other various internal reports. In addition to reporting duties, *ops/Info* support was provided. This included system enhancements, configuration, and maintenance activities.

Rachel Hickey

Consultant II, Scientist

Rachel Hickey is a Consultant with ERM based in Boston, MA. She has over 10 years of experience in environmental resource management, impact assessments, biological surveys, regulatory permitting, nuclear chemistry and project management. Rachel has held responsibility for maintaining compliance with state and federal regulations for permitting environmental releases of an operating nuclear power plant. Rachel also has experience with permitting local, state, and federal ordinances, including the Army Corps of Engineers, National Pollutant Discharge Elimination System, and Stormwater Pollution Prevention. Rachel also has experience with large data set management and wetland delineations.



Experience: 9 years' experience in environmental assessment & 5 years' experience in nuclear

LinkedIn: <https://www.linkedin.com/in/rachel-hickey4/>

Email: rachel.hickey@erm.com

Education

- MS. Marine Science & Coastal Zone Management
Nova Southeastern University, USA, 2015
- BS. Marine Biology & Aquaculture
University of Maine, 2008

Professional Affiliations and Registrations

- Open Water SCUBA Certification

Languages

- English, native speaker

Fields of Competence

- Environmental impact permitting
- Wetlands and soil science
- Water chemistry
- Marine ecosystems
- Protected Species Observer
- Nuclear systems and reactor chemistry

Key Industry Sectors

- Nuclear
- Power
- Government

Publications

- Evaluation of Endocrine Disrupting Chemicals in the Florida Coastal Pelagic Fish Complex Following the Deepwater Horizon Oil Spill Event, 2015

Key Projects Prior to Joining ERM

Senior Nuclear Chemistry Technician

Permitting compliance with state and federal regulations for radioactive and environmental contaminant releases. Analysis and assessment of radioactive contaminants and chemical properties of various liquid and gaseous systems and components of a nuclear power plant. Provided recommendations for plant operations to ensure long-term reliability. Extensive calibration and maintenance of analytical lab equipment.

Environmental Specialist

Assessment and issuance of environmental resource permits for the State of Florida. Habitat assessments and wetland delineations performed for adherence to state, federal and local regulations. Assessment of environmental impacts and determination of mitigation effectiveness for large-scale projects, such as installation of transmission lines and solar fields, as well as underwater dredging and installation of sub-surface structures.

Graduate Student Researcher

Implementation studies for new commercial fishery gear specifically engineered for the reduction of bycatch. Biological assessment of endocrine disruption in coastal pelagic fishes following the Deepwater Horizon oil spill and clean-up efforts in the Gulf of Mexico through blood and mucosal protein extraction. Technical document writing and presentation. Various fisheries related biological research studies.

NMFS Fisheries Observer

Contracted National Marine Fisheries Service fisheries and protected species observer for the commercial fishing industry. Recording of catch and bycatch data, including protected species sightings and interactions, for commercial fishery operations.

Craig S. Chartier, M.A., RPA

Senior Archaeologist

Craig Chartier is a SOI-qualified Professional Archaeologist and a Senior Consultant with ERM based in Boston, Massachusetts. He is a member of ERM's Cultural Resource Field Services work group. Mr. Chartier is skillful in developing and implementing effective federal and state-level cultural resource regulatory compliance strategies for complex development projects. He has 30+ years of experience in professional archaeology with a focus on historical archaeology, prehistory, contextual history, systematic pedestrian survey, Section-106 assessment, technical reporting, mapping, and lab processing. Craig has wide-ranging experience working throughout New England and the Eastern Woodlands and is author, co-author, and editor of numerous technical reports. Craig also has extensive laboratory experience in historic and Native artifact identification, processing, soil sample processing (flotation and composition analysis), faunal and floral analysis, and Native material culture analysis (pottery and lithics) and replication.



Experience: 32 years' experience in professional archaeology and cultural resource management

Email: craig.chartier@erm.com

Professional Registrations & Certifications

- Massachusetts Principal Investigator
- Rhode Island Principal Investigator
- Connecticut Principal Investigator
- NPS Qualified Archaeologist

Fields of Competence

- Historical archaeology- New England, Mid-Atlantic, Virginia
- Prehistoric archaeology – New England, Eastern Woodlands, Southeast
- Zooarchaeology
- Flotation processing and analysis
- Soil science
- Cemetery Remediation
- Compliance Monitoring

Education

- M.A., Historical Archaeology, University of Massachusetts, Boston.
- B.A., Anthropology, University of Rhode Island.

- Anthropology of the Skeleton, Brown University.

Languages

- English, native speaker

Key Industry Sectors

- Renewable Resources
- Power Generation & Transmission
- Transportation
- Local and State Regulatory Compliance

Professional Presentations

2003 Organized Session on "The Current State of Plymouth Colony Archaeology". Society for Historical Archaeology Annual Meeting, Providence Rhode Island.

2003 *Faunal Remains from Plymouth Colony Sites*. Society for Historical Archaeology Annual Meeting, Providence Rhode Island.

2001 *A Reinterpretation of the Attack on the Clark Garrison House, Plymouth, Massachusetts*. Council for Northeastern Historical Archaeology Annual Meeting, Niagara Falls, Ontario, Canada

2001 *The Position of the European Chicken (Gallus gallus) in Seventeenth Century Native New England Culture*. Council for Northeastern Historical Archaeology Annual Meeting, Niagara Falls, Ontario, Canada

1995 *Ceramics from the Allerton Cushman Site 1632-1699*. Council for Northeastern Historical Archaeology Annual Meeting, Fortress of Louisburg, Nova Scotia.

1995 *Faunal Remains from the Ezra Perry II Site, Bourne, Massachusetts*. Council for Northeastern Historical Archaeology Annual Meeting, Fortress of Louisburg, Nova Scotia.

Key Work at ERM

Pipeline Maintenance Projects Ohio
Pipeline Maintenance Projects South Dakota
Pipeline Maintenance Project North Carolina
Pipeline Maintenance/ Installation Project Virginia
Solar Project Virginia
Transmission Projects West Virginia

Key Projects/Reports Before Joining ERM

- 2022 Field Director. Archaeological Monitoring Cato Street Cemetery, Woonsocket, RI.
- 2002 Field Director. Phase I Archaeological Survey Black Rock State Park. Watertown, CT.
- 2022 Field Director. Phase I Archaeological Survey Proposed Norwich Business Park. Norwich, CT.
- 2022 Field Director. Phase I Archaeological Survey of Four Fields for the Connecticut Correctional System. Enfield and Cheshire, CT.
- 2021 Field Director. Phase I Archaeological Survey Creese and Cook Tannery Superfund Site. Danvers, MA.
- 2021 Field Director, Co-Project Archaeologist. Phase I Archaeological Survey for Proposed Solar Farm. Coventry, RI.
- 2021 Field Director, Co-Project Archaeologist. Phase I and II Surveys Proposed Campground Location. East Haddam, CT.
- 2021 Field Director, Co-Project Archaeologist. Phase I and II Surveys for Proposed Lawn Supply Business Expansion. East Windsor, CT.
- 2019-2022 Field Director. Monitoring New Haven Railroad. New Haven, CT.
- 2017-2019 Project Archaeologist, Field Director. William Nickerson Homesite (1660-1690) Data Recovery, Chatham, MA.
- 2011-2018 Project Archaeologist, Field Director. Taylor Bray Farm Property Survey and Site Examinations (10,000 BP to ca. 1900), Yarmouth, MA.
- 2016 Field Director. Archaeological Monitoring Springfield Armory National Park. Springfield, MA.
- 2014 Project Archaeologist, Field Director. East Providence Burial Ground Relocation. East Providence, RI.
- 2014 Project Archaeologist, Field Director. Archaeological Survey Cape Cod National Seashore. Truro, MA.

Edward G. Graham, III

Senior Consultant

Edward has twenty-two years of experience with the United States Coast Guard, retiring as a Chief Boatswain's Mate with eight years of sea service and skills including law enforcement, fisheries enforcement, search/rescue, boat/ship/equipment operating, maritime construction and rigging. He served two years as the First Lieutenant aboard the USCGC Penobscot Bay supporting marine infrastructure and interests in the North Atlantic region, including emergency icebreaking relief missions along the Saint Lawrence Seaway in Canada. He has over ten years of experience working on environmental construction management and site remediation oversight projects. His experience includes project management and oversight in a variety of project environments, including offshore, shipyards, barges, and residential areas. He is skilled with providing an interface between project management team and subcontractors.



Experience: Ten years' experience in oil and gas, manufacturing, and shipyard sectors. Twenty-two years' experience in the U.S. Coast Guard. Corporate health and safety committee chairperson.

LinkedIn: <https://www.linkedin.com/in/edward-graham-12382a20/>

Email: edward.graham@erm.com

Professional Affiliations and Registrations

- United States Coast Guard (Retired)
- Military Security Clearance (Secret)
- Transportation Worker Identification Card

Languages

- English, native speaker

Fields of Competence

- Construction Management
- Mobile construction equipment subject matter expert
- Aquatic work subject matter expert
- Project management
- Health and Safety
- Site Remediation Oversight
- Heavy Equipment Operation
- Personnel Management
- Scheduling and Budgeting
- Logistics
- Permitting (Land and Sea)
- Ship and Small Boat Operation
- Waterway Construction
- Pollution Response and Reporting

Key Industry Sectors

- Maritime
- Oil & gas
- Manufacturing
- Pipeline

Key Projects

On-Site Manager, Decommissioning of Offshore Platform and Subsea Module fabrication facility

Served as on-site manager for the decommissioning of an offshore platform and subsea module fabrication facility. Responsibilities included: preparation of work scopes for competitive bid to include demolition, pit and tank cleaning, waste disposal, impacted soil removal, backfill and site restoration; daily coordination with client to assess and implement project goals; daily reporting to client documenting project progress; coordination with hazardous waste and industrial waste landfill operators for the transportation and disposal of waste; oversight of asbestos abatement contractors; oversight of demolition contractors; oversight of waste handling and transportation contractors; oversight of gas canister flaring and disposal operations; waste sampling for disposal parameters; soil sampling for regulatory compliance; oversight of tank and pit cleaning in compliance with Fall Protection and Confined Space Entry requirements.

On-Site Representative, Former Oil and Gas E&P sites

Served as on-site owner representative for three remediation projects of former oil and gas E&P sites in in Cameron Parish, Louisiana. Project required excavation, transportation, and offsite disposal of approximately 12,000 cubic yards of impacted soil; confirmation testing; backfill of excavated areas; land treatment of approximately 75,000 cubic yards of salt-impacted soil; plugging and abandonment of a former rig supply well; and site restoration. Duties included monitoring daily work progress for adherence to safety protocols (including traffic flow), regulatory and contract requirements; tracking progress on pay items; waste manifesting and transportation coordination; confirmation and design sampling; photographic documentation of remediation activities; compliance with storm water, wetlands and coastal use permits; and communication with office personnel, landowner and

landowner representatives, clients, and the field services contractor. Compiled project tracking documentation and completed daily progress reports for distribution to client and landowner representatives. Project completed with no safety incidents and No Further Action determination from the Louisiana Department of Natural Resources.

Construction Manager for Closure of Former Oil & Gas E&P Pit

Served as construction oversight and onsite health and safety manager for the closure of a former oil and gas E&P pit in an active oil and gas field in Vermilion Parish, Louisiana. The project was a water-based barge and boat access remediation project that included the installation of sheet piling; excavation, barge loading, transportation, and disposal of approximately 1,500 cubic yards of impacted pit contents and adjacent sediments; confirmation testing to demonstrate compliance with closure requirements; backfill of excavated areas and site restoration. Project duties included monitoring daily work progress for adherence to safety protocols, regulatory and contract requirements; tracking progress on pay items; waste manifesting; confirmation sampling; photographic documentation; compliance with wetlands and coastal use permits; and communication with office support personnel, contractor personnel and representatives of the current operator. Provided insight and coordination to facilitate compliance with Coast Guard requirements for this water-based project.

Site Coordinator and Remediation Oversight, Arsenic-Affected Soils

Served as site coordinator and remediation oversight for a four-site remediation lump sum billing project to remove arsenic-contaminated soils in Vermilion Parish, Louisiana. Project required extensive coordination and communication with landowners of the four separate and distinct project remediation sites. Duties included monitoring daily work progress, monitoring, and revising budget and spending to effectively control and minimize costs, XRF field

testing for arsenic in soil, confirmation sampling, waste manifesting and transportation, photographic documentation. Project completed with no safety incidents and a No Further Action determination from the Louisiana Department of Environmental Quality.

**Site Coordinator and Remediation Oversight,
Chemical Waste Disposal Site**

Served as site coordinator for remediation of a chemical waste disposal site in south Louisiana. Managed remediation contractor and air monitoring contractor. Conducted oversight for construction of large temporary enclosure for containment of air emissions from remediation. Responsible for project documentation and collection of confirmation samples. Coordinated with regulators and contractors' representatives to achieve project goals. Responsible for coordination with residential property owners near the site.

Heather L. Heater, PMP

Partner, Offshore Wind Leader, Capital Project Delivery

Heather's experience covers a variety of power projects including offshore wind, onshore wind, transmission lines, pipelines, and power generation facilities. She has experience in developing and implementing regulatory permitting strategies, conducting feasibility and siting studies, and preparing and filing environmental impact statements. She has coordinated regulatory permit processes at the federal, state and local level and has extensive working knowledge of US Army Corps of Engineers Rivers and Harbors Act, Section 10; Clean Water Act, Sections 401/404; National Environmental Policy Act related studies and regulatory permitting; and Coastal Zone Management. Heather has led or participated in agency coordination and consultation efforts with various agencies, and has a current and thorough understanding of federal and state environmental regulations in multiple states.



Experience: 24 years' experience in Power/Capital Project Delivery

Email: heather.heater@erm.com

LinkedIn: <https://www.linkedin.com/in/heather-heater>

Education

- M.S. Environmental Resource Management, Florida Institute of Technology, USA, 1999
- B.S. Marine Biology, Florida Institute of Technology, USA, 1997

Professional Affiliations and Registrations

- Project Management Professional
- Women's Energy Network

Languages

- English, native speaker

Fields of Competence

- Federal, state, and local permitting
- Environmental impact assessments
- NEPA compliance
- Feasibility and siting studies
- Routing analysis
- Land use and permitting
- Land services
- Fisheries and marine biology
- Coastal zone management

Key Industry Sectors

- Power
- Real Estate & Land Development
- Mining

Key Projects

New England Wind Offshore Project

Heather is serving as the Partner-in-Charge for the third-party NEPA EIS support to BOEM an approximate 2,300-MW proposed offshore wind project in the US off the coast of Massachusetts on the outer continental shelf. She is responsible for the strategic planning, oversight, and coordination of the EIS for the project. Responsibilities include overseeing the NEPA EIS, including the preparation of a draft and final EIS that addresses potential environmental, social, economic, historic and cultural impacts of the project as well the scoping meetings and public hearings, creation of comment management database for managing and addressing public comments, participation and facilitation in interagency meetings, development of two Biological Assessments and an Essential Fish Habitat Assessment report.

Vineyard Wind 1 Offshore Project

Heather is serving as the Partner-in-Charge for overseeing and managing the environmental compliance management reports and development of the digital tracking tool for the construction of the Project.

Heather served as the project manager for the third-party NEPA EIS support to BOEM for the first offshore wind project in the US off the coast of Massachusetts. The project is an approximate 800-MW project located on the outer continental shelf. She was responsible for the strategic planning, oversight, and coordination of the EIS for the project. Responsibilities included preparation of a draft and final EIS that addresses potential environmental, social, economic, historic and cultural impacts that could result from construction, operation, maintenance and decommissioning of the project. In addition, responsibilities included facilitating five scoping meetings and five public hearings, creation of comment management database for managing

and addressing public comments, participation and facilitation in interagency meetings, development of two Biological Assessments and an Essential Fish Habitat Assessment report.

Cape Wind Offshore Project (prior to ERM)

Heather served as the regulatory manager for the proposed offshore wind farm in Nantucket Sound. She was responsible for the strategic planning, oversight, and coordination of all federal, state, and local permitting requirements for the Project. She was also responsible for coordinating and reviewing all environmental studies including the wetland delineation and avian field studies, environmental impact assessments and regulatory review for the associated regulatory permit applications. In addition, she was responsible for coordination with the appropriate agencies to assist in their review of the Project.

Offshore Wind Feasibility Studies, Great Lakes

Assisted in conducting an analysis of environmental constraints and permitting requirements related to proposed offshore wind energy development projects in Lakes Erie and Ontario. The desktop assessments were a comprehensive screening evaluation of environmental and physical issues that affect the ability to install proposed wind farm, submarine cable, and landfall locations. The assessments included a list of required permits, identification of relevant environmental conditions, and construction windows.

Section 1: Attachment B - Resume of Proposed Fisheries Representative

R. Todd Corayer

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401.714.4420 tcorayer@fishwrapwriter.com

Affiliations:

RI Saltwater Anglers Association (2014-Present) Legislative, Newsletter Committee, Association of Great Lakes Outdoor Writers (2019-Present), Outdoor Writers Association of America (2019-Present), Trout Unlimited (2017-Present), Past member New England Outdoors Writers Association, Ducks Unlimited. CDL-A, Excavation Equipment License

- F/V Bonnie S. Block Island, inshore lobster trapping, winter hand lining for cod. 2 years, Deck hand, late eighties
- F/V Mad Monk Block Island, inshore/offshore lobster trapping, gillnetting monkfish, deck hand, 1995-1996
- F/V Little One, Block Island, offshore longline for swordfish, tuna. Winter cod fishing BI and Martha's Vineyard, deck hand 1995-1996
- 2023 Lawson Carey Jr. Conservationist of the Year award, Trout Unlimited. Honorary Membership Award, Narragansett Surfcasters
- Recreational fishing trips: 2022, 59. 2021, 48. 2020, 47. 2019 51. 2018 49.

2021-Present	Assistant Superintendent, Town of South Kingstown, RI	
2018-2021	The Preserve at Boulder Hills, Fishing & Shooting Guide, media writer	
2012-2018	Town of South Kingstown, RI Equipment Operator 2	
2015-2018	Bluefish Advisory Board, Mid Atlantic Fishery Management Council, representing commercial, recreational and for-hire concerns	
2010-Present	Freelance outdoors writer	
2005-2012	Whole Foods Market	Several States
	Seafood Team Leader. Responsible for fiscal, labor & product management.	
2005	Eastern Maine Mussel Co.	Hancock, Maine
	Plant Manager. Responsible for all phases of startup blue mussel processing facility including initial setup, personnel hiring, purchasing, quality control, shipping and machine maintenance.	
2001-2004	American Mussel Harvesters, Inc.	N. Kingstown, R.I.
	Buyer. Responsible for purchasing all shellfish from the U.S. and Canada, representing at trade and food shows nation-wide. Design and maintenance of website, frequent corporate, chef and wait staff training in shellfish husbandry, sales and marketing.	

2001-2004	Salt Water Farms, LLC	N. Kingstown, R.I.
	Co-Owner and Farm Manager for a 15-acre multi-species lease in Narragansett Bay. Responsible for all phases of design, construction and maintenance of submerged longline poly-culture operation, maintenance and daily operation of 35' Novi	
2001-2004	Ocean State Aquaculture Association	
	Vice President, President	
2000-2005	Northeast Regional Aquaculture Center, Univ. of MA, Dartmouth	
	Industry Representative, Technical Industry Advisory Council	
1995-2001	Block Island Shellfish Farm	B.I., R.I.
	Founder, owner of sustainable aquaculture operation. Licensed grower of <i>M. mercenaria</i> , <i>A. irradian</i> , <i>C. virginica</i> . HACCP compliant, certified interstate shellfish shipper	
2000	Intercoastal Upweller Designs, LLC	B.I., R.I.
	Founder, owner. Developer of Photovoltaic Powered Floating Shellfish Upweller Systems	
	Awarded R&D Partnership Award from the Slater Center for Ocean Technology, URI	
	Awarded Block Island Renewable Energy Grant from USDOE for development of alternative shellfish upweller power sourcing	
1998-2001	Town of New Shoreham	B.I., R.I.
	New Shoreham Shellfish Commission	
1995-1998	Town of New Shoreham	B.I., R.I.
	Town Councilor, Police Commission, Board of License Commissioners, Water Board	

Section 2: Revolution Wind CRMC Compliance Implementation and Management Plan

Compliance Implementation and Management Plan

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1.0 Introduction

1.1 PROJECT INTRODUCTION

Revolution Wind, LLC proposes to construct, operate, and maintain the Revolution Wind Project (“Project”), an offshore wind farm that will deliver approximately 704 megawatts (“MW”) of renewable energy to the States of Rhode Island (RI) and Connecticut. The Project will include an offshore wind farm which is located approximately 15 miles southeast off the Rhode Island coast. The Project will include construction of an AC export cable that will extend from the Revolution Wind Farm in federal offshore waters to coastal RI waters and inland to a new Onshore Substation and Interconnection Facility adjacent to the existing The Narragansett Electric Company (TNEC) Davisville Substation.

1.2 PURPOSE OF THIS PLAN

The Compliance Implementation and Management Plan (CIMP) for the Project was developed to establish the framework to monitor compliance with the Project’s approved siting and permit conditions, which authorize the construction, operation, and maintenance of the Project, as well as all associated environmental permits, approvals, and certifications for the Project, including the CRMC Category A Assent and Category B Assent issued for the Project (dated 3/13/2023 and 5/5/2023, respectively). The goal of the CIMP is to establish the framework and processes necessary to ensure that all environmental and other compliance requirements are achieved during construction of the Project and during restoration. The CIMP is a living document, and will be updated regularly to include new contractors, project personnel, and project changes.

1.3 PROJECT LOCATIONS AND DESCRIPTIONS

The wind farm portion of the Project will be located in federal waters on the Outer Continental Shelf (OCS) within designated Bureau of Ocean Energy Management (BOEM) Renewable Energy Lease Area OCS-A 0486 (Lease Area). Other components of the Project will be in State Waters of RI and onshore in the North Kingstown, RI. The proposed interconnection location for the Project is at the existing Davisville Substation, which is owned and operated by TNEC d/b/a Rhode Island Energy and located in North Kingstown, RI. The Project will specifically include the following onshore components:

- A Landfall Work Area located at Quonset Point in North Kingstown, RI;
- Two underground transmission circuits (referred to as the Onshore Transmission Cable), co-located within a single corridor;
- An Onshore Substation (OnSS) and Interconnection Facility (ICF) located adjacent to the existing TNEC Davisville Substation;
- An underground right-of-way (ROW) connecting the OnSS to the ICF (Interconnection ROW); and
- An overhead ROW connecting the ICF to TNEC’s Davisville Substation (TNEC ROW).
- Onsite presence at the Construction Management Site in Quonset, RI during seabed prep as well as cable installation starting with boulder clearance operations in Q1 (2024).

In addition, the Project will include the following nearshore and offshore components:

- 79 positions for the installation of 65 Wind Turbine Generators (WTGs) connected by a network of Inter-Array Cables (IACs);
- Up to two Offshore Substations (OSSs) connected by an OSS-Link Cable; and
- Up to two submarine export cables generally co-located within a single corridor.

2.0 Permit Overview

2.1 FEDERAL

Figure 1. Required Federal Permits and Approvals

Agency	Permit/Approval
Federal	
BOEM	<ul style="list-style-type: none"> • Commercial Lease of Submerged Lands for Renewable Energy Development on the OCS, in accordance with the Outer Continental Shelf Lands Act (“OCSLA”) (43 U.S.C. §§ 1331 et seq.); Section 388 of the Energy Policy Act of 2005, BOEM implementing regulations (30 CFR § 585) • Site Assessment Plan (“SAP”) approval pursuant to 30 CFR §§ 585.610-618 • COP approval pursuant to 30 CFR §§ 585.621-627 • Facility Design Report (“FDR”) approval pursuant to 30 CFR 585.701 (33 U.S.C. § 1221) • Fabrication and Installation Report (“FIR”) approval pursuant to 30 CFR § 585.700 • Consultation pursuant to Section 7 of the Endangered Species Act (“ESA”) (16 U.S.C. §§ 1531 et seq.), with National Marine Fisheries Service (“NMFS”) and United States Fish and Wildlife Service (“USFWS”) • Essential Fish Habitat (“EFH”) Consultation pursuant to the Magnuson-Stevens Fishery Conservation and Management Act (“MSFCMA”) (16 U.S.C. §§1801 et seq.) • Consultation pursuant to the Migratory Bird Treaty Act (“MBTA”) (16 U.S.C. §§ 703 et seq.) and Bald and Golden Eagle Protection Act (16 U.S.C. §§ 668 et seq.) • Review pursuant to the NEPA (42 U.S.C. §§4321 et seq.), BOEM regulations (30 CFR §§ 585.646,585. 648(b)), and other relevant regulations in consultation with the USACE, Department of Defense (“DoD”), Advisory Council on Historic Preservation, and other cooperating regulatory agencies
USACE New England District	<ul style="list-style-type: none"> • Section 10 Individual Permit pursuant to the Rivers and Harbors Appropriation Act of 1899 (33 U.S.C. §§ 401 et seq.) • Section 404 Individual Permit pursuant to the Clean Water Act of 1972 (“CWA”) (33 U.S.C. § 1344)
USCG District 1	<ul style="list-style-type: none"> • Private Aids to Navigation (“PATON”) Permit pursuant to 33 CFR § 66 (49 U.S.C. § 44718) • Local Notice to Mariners (“LNM”)
USEPA New England (Region 1)	<ul style="list-style-type: none"> • OCS Air Quality Permit pursuant to 40 CFR § 55 (Clean Air Act., 42 U.S.C. § 7627)
FAA	<ul style="list-style-type: none"> • Determination of No Hazard to Air Navigation pursuant to 14 CFR §77
NOAA National Marine Fisheries Service	<ul style="list-style-type: none"> • Request Incidental Take Authorization pursuant to the Marine Mammal Protection Act (“MMPA”) (16 U.S.C. §§ 1361 et seq.) • Request for Incidental Take Statement (“ITS”) pursuant to Section 7 of the ESA of 1973 (16 U.S.C. §§ 1531 et seq.)

BOEM = Bureau of Ocean Energy Management
 USACE = United States Army Corps of Engineers
 USCG = United States Coast Guard
 USEPA = United States Environmental Protection Agency
 FAA = Federal Aviation Administration
 NOAA = National Oceanic and Atmospheric Administration

2.2 STATE

Figure 2. State Environmental Permits and Approvals

Agency	Permit/Approval
RIEFSB	<ul style="list-style-type: none"> License pursuant to the Energy Facility Siting Act (Rhode Island General Laws [RIGL] §§ 42-98-1 et seq.).
RI CRMC	<ul style="list-style-type: none"> Federal Consistency Determination pursuant to Section 307 of the CZMA (16 U.S.C. § 1456) and § 11.10 of RI Ocean Special Area Management Plan [Ocean SAMP] (650-RICR-20-05-2.1 et seq.) Category B Assent and Submerged Lands License pursuant to RI CRMC Management Procedures (the “Red Book”) (650-RICR-20-00-1 et seq.; consultation as required with the Rhode Island Department of Environmental Management (RIDEM) regarding the Rhode Island Endangered Species of Animals and Plants Act (Rhode Island ESA) (RIGL § 20-37-3); Rhode Island Bureau of Natural Resources, Division of Fish and Wildlife; and Rhode Island Historical Preservation and Heritage Commission (RIHPHC) (RIGL 42-45-1 et seq.). Permit to Alter Freshwater Wetlands in the Vicinity of the Coast (650-RICR-20-00-2). Authorization under the Rhode Island Pollutant Discharge Elimination System (RIPDES) General Permit for Stormwater Discharge Associated with Construction Activity (Construction General Permit or CGP).
RIDEM	<ul style="list-style-type: none"> Water Quality Certificate (“WQC”) pursuant to RIGL § 46-12-3 and 250-RICR-150-05-1.1 et seq. (federal authority delegated to the State pursuant the CWA, 33 U.S.C. §§ 1341-1342)
RIDEM and RI CRMC	<ul style="list-style-type: none"> Dredge permit pursuant to the Rules and Regulations for Dredging and the Management of Dredged Materials (250-RICR-150-05-2.1 et seq.) for temporary excavation and backfill of HDD exit pits
MA CZM	<ul style="list-style-type: none"> Concurrence with Coastal Zone Management Program

RI EFSB = Rhode Island Energy Facilities Siting Board

RIDEM = Rhode Island Department of Environmental Management

RICRMC = Rhode Island Coastal Resources Management Council

MA CZM = Massachusetts Office of Coastal Zone Management

2.3 LOCAL

Figure 3. Local Environmental Permits and Approvals

Agency	Permit/Approval
Town of North Kingstown	<ul style="list-style-type: none"> Road Permit (if applicable)
Quonset Development Corporation	<ul style="list-style-type: none"> Development Review Process (RIGL 42-64.10-5; QDC Development Regulations, 880-RICR-00-00-4 et seq.) Site Plan Approval Construction Operations Plan Road Cut Permits

3.0 Roles and Responsibilities

3.1 ONSHORE

Revolution Wind's assigned Project representatives will interface directly with Environmental Inspectors (EI), regulatory agencies, and other key stakeholders. Revolution Wind has the ultimate authority to issue a site-specific stop work order for unsatisfactory performance. Similarly, Revolution Wind has the ultimate authority to issue a notice to proceed to implement corrective actions to resolve unsatisfactory performance. Project representatives and functional leads are subject matter experts in particular areas of Project components and may have the compliance responsibilities described below. Various compliance responsibilities may be shared amongst the Project representatives throughout compliance implementation and management. **A final communications list including phone numbers and email addresses of key Project personnel and compliance team members will be provided to all 3rd party field inspector(s) prior to the start of construction.**

3.1.1 Project Manager-Onshore (PM)

- Overall responsibility for verifying that the Project is constructed in accordance with the plans submitted to and approved by each regulatory agency;
- Attends regulatory compliance review meetings or designates an individual to attend the meetings;
- Reviews Project Change Requests and assesses impacts on regulatory and non-regulatory commitments, Project budget and Project schedule;
- Communicates compliance and non-regulatory commitment issues to leadership; and
- Coordinates with the Owner, the Compliance Management Team, and appropriate Governmental Authorities on Project Changes, stop work orders, and non-regulatory commitments.

3.1.2 Manager – Siting and Compliance (Onshore)

- Reviews and approves modifications of environmental permits prior to submission to the applicable Governmental Authorities;
- Reviews and approves any Non-Compliance or Notice of Violation notifications prior to submission to Construction Subcontractor;
- Approves all Contractor environmental compliance-related submissions to Governmental Authorities;
- Signs permit modification, renewal, and permit closure Notice of Termination (NOT) documents requiring authorized Owner signature. Submission will be consistent with tasks delineated in the Permitting Plan;
- Attends regulatory compliance review meetings or designates an individual to attend the meetings;
- Manages the Owner’s Legal Team for submittal of all correspondence to agencies, as required;
- Directs environmental inspections, coordinating daily inspections as well as non-routine monitoring (such as stormwater inspections in response to heavy rainfall or special environmental monitors/inspectors), as necessary;
- Provides guidance to the Field Inspectors (FIs) on interpretation of requirements of permits and approvals; and
- Performs QA/QC of the daily reports and compiles a weekly summary report for the Owner for submittal to the agency.

3.2 ONSHORE CONTRACTED ROLES

3.2.1 Construction Contractor

There will be a variety of Onshore Construction Contractor(s) on site at any given point in time. Each Construction Contractor will ensure that resource needs are adequately identified and assigned to fully support the construction contract work plans, schedule, and budget. Each Construction Contractor is expected to have its own crew with specific designated roles and responsibilities in addition to those described below. Additional roles/responsibilities may include (but are not limited to):

- Duct Bank Contractor(s);
- Interconnection Facility Contractor; and
- Substation Contractor.

Construction crews will report to the Construction Contractor who will ultimately report to the Construction Supervisor (CS) and Compliance Manager (CM).

The Owner and CM are responsible for environmental compliance inspections, reporting, and agency interface. However, the Construction Contractor will be available for support of environmental compliance, including but not limited to actions as described below.

The Construction Contractor will report spills or releases to FIs and notify required parties (i.e., the distribution list) of a spill or release. The Construction Contractor will also be responsible for cleaning up the spills or releases.

3.2.2 Onshore Field Inspector (FI)

FIs will be tasked with day-to-day observation of the Project to monitor for compliance with all applicable permits and approvals. FIs will also satisfy the qualifications of a “Qualified Inspector” pursuant to the SPDES General Stormwater Permit for Construction Activity (GP-0-20-001).

Reports to: Eversource (ES) Compliance Manager / Orsted Environmental Compliance Manager

Stop Work Authority: Yes

Responsibilities Include:

- Coordinate preconstruction walkdowns with the Construction Contractor(s) to verify a comprehensive understanding of site regulations and required compliance;
- Direct environmental inspection, coordinating daily inspections as well as non-routine monitoring (such as stormwater inspections in response to heavy rainfall or special environmental monitors/inspectors), as necessary;
- Provides guidance to the Field Inspectors (FIs) on interpretation of requirements of permits and approvals;
- Performs QA/QC of the daily reports and compiles a weekly summary report for the Owner for submittal to the agency;

- Organizes internal monthly compliance audits for Owner and Subcontractor;
- Maintains a record of observations of State threatened & endangered (“T&E”) species during construction, operation, and maintenance of the Project, including any dead, injured, and damaged T&E species, their eggs, or nest (“T&E Observations”);
- Attendance at daily safety meetings conducted by the Construction Contractor;
- Perform daily inspections of construction work sites and submit daily monitoring logs to Project team;
- Administer site orientation for new workers and Project personnel on site;
- Monitor construction activities, including but not limited to, clearing, access and drainage improvements/installations, installation and maintenance of temporary erosion controls, work involving wetlands, streams, agricultural lands, etc., and restoration activities;
- Monitoring and supporting compliance with the environmental management and protection requirements specified by all applicable permits and authorizations, and closely coordinating with the Owner and Construction Contractor(s) for compliance with these provisions;
- Participate in daily tailboard meetings with the Construction Contractor(s) to obtain schedule; and
- Implementing and completing all required onshore compliance activities as described in the Project Compliance Management System (CMS).

3.3 OFFSHORE

The Owner’s assigned Offshore Project representatives will interface directly with regulatory agencies, and other key stakeholders. The Owner has the ultimate authority to issue a site-specific stop work order for unsatisfactory performance. Similarly, the Owner has the ultimate authority to issue a notice to proceed to implement corrective actions to resolve unsatisfactory performance. Project representatives and functional leads are subject matter experts in particular areas of the Project and may have the following compliance responsibilities. Various responsibilities may be shared amongst the Project representatives throughout compliance implementation and management. **A final communications list including phone numbers and email addresses of key Project personnel and compliance team members will be provided to the CRMC and 3rd party inspector(s) prior to the start of construction.**

3.3.1 Engineering, Procurement, and Construction Director (EPCD)

- Overall responsibility for verifying that the Project is constructed in accordance with the plans submitted to and approved by each regulatory agency;
- Attends regulatory compliance review meetings or designates an individual to attend the meetings;
- Reviews Project Change Requests and assesses impacts on regulatory and non-regulatory commitments, Project budget and Project schedule;
- Communicates compliance and non-regulatory commitment issues to leadership; and
- Coordinates with the Owner, the Compliance Management Team, and appropriate Governmental Authorities, stop work orders, and non-regulatory commitments.

3.3.2 Environmental Compliance Manager (ECM)

- Reviews modifications of environmental permits in coordination with Permit Team prior to submission to the applicable Governmental Authorities;
- Reviews and approves any Non-Compliance or Notice of Violation notifications prior to submission to Construction Subcontractor;
- Attends regulatory compliance review meetings or designates an individual to attend the meetings;
- Coordinates with the Owner's Legal Team for submittal of correspondence to agencies, as required;
- Serve as the point-of-contact and lead for in-water environmental and permitting compliance during Project planning and construction;
- Direct in-water environmental compliance contractors and consultants, environmental inspectors, and associated compliance field personnel during in-water construction activities;
- Direct in-water environmental inspection, coordinating inspections as well as non-routine monitoring, as necessary;
- Provides guidance to the FIs on interpretation of all permits and approvals;
- Performs QA/QC of the daily reports; and
- Coordinates, produces, or collects (e.g., from FIs, Construction Contractor(s), or others), and submits reports to agencies in compliance with applicable permit conditions.

3.4 OFFSHORE CONTRACTED ROLES

3.4.1 Construction Contractors

Instead of one primary contractor during offshore activities, there will be numerous Construction Contractor(s) on site at any given time. Each Construction Contractor will ensure that compliance needs are adequately identified and assigned to fully support the construction contract work plans, schedule, and budget. Each Construction Contractor is expected to have their own crew with designated roles and responsibilities in addition to those described below. Additional roles/responsibilities for activities within RI Waters and during Horizontal Directional Drilling (HDD) may include (but are not limited to):

- HDD Contractor (Landfall and RI waters offshore); and

- Offshore Cable Installation Contractor (RI waters offshore), includes cable pull-in and thermal grouting.

All construction crews will report to their respective lead Construction Contractor who will ultimately report to the Project Construction Supervisor (CS). The CS will relay information to the EPCD and the ECM. The Owner and ECM are responsible for environmental compliance inspections, reporting and agency interface. However, the Construction Contractor will be available for support of environmental compliance, including but not limited to what is described below.

The Construction Contractor will report spills or releases to Orsted and notify required parties (i.e., the distribution list). The Construction Contractor will also be responsible for cleaning up the spills or releases.

3.5 PERMIT / APPROVAL -REQUIRED ROLES

3.5.1 3rd Party Environmental Compliance Monitors/Third-Party Inspector Onshore – CRMC Assent(s)

One independent, third-party inspector (TPI-Onshore) for onshore work will be assigned to the Project. The TPI-Onshore is expected to make weekly site visits to the Project site during construction and report back weekly to CRMC Staff. The role of the TPI-Onshore will be to observe construction activities and to interface with Project FIs to ensure compliance with all applicable conditions and regulations. The TPI-Onshore will have hard copies of all applicable permits and Project plans and all necessary contact information while monitoring the Project. If at any time, the TPI-Onshore identifies a compliance issue or needs to discuss Project construction or scheduling, they will communicate directly to the full time FI on-site. If necessary, other Project compliance roles may be brought into discussions with the TPI-Onshore

Reports to: CRMC Staff

Stop work authority: Yes

Activities undertaken by the TPI-Onshore **may** include the following tasks and/or observations and reporting on the following activities:

- Attendance at daily safety meetings conducted by the Construction Contractor and sign tailboard when onsite;
- Monitoring and supporting Construction Contractor compliance with the environmental management and protection requirements specified by the Certificate and all applicable permits and approvals, and closely coordinating with the CS and Construction Contractor(s) for compliance with these provisions;
- Refueling/spills/containment;
- Soil and groundwater management;
- Clearing, access and drainage improvements/installations;
- Attend site compliance inspections with CS, and other Project team personnel;

- Observation of RI in-water work that requires suspended sediment and water quality sampling;
- Observation of HDD landfall work;
- Inadvertent returns monitoring and assistance (where appropriate) associated with HDD, and;
- Review noise monitoring data

3.5.2 3rd Party Environmental Compliance Monitors/Third-Party Inspector In-Water – CRMC Assent(s)

One independent, third-party Environmental inspector for HDD/Offshore work (TPI-In Water) will be assigned to the Project. The TPI-In Water is expected to make 3 site visits per week to the Project site during HDD and offshore construction activities within RI State Waters and report back weekly to CRMC Staff. TPI will have the option to make additional site visits during the week if requested by CRMC. During the weekly onsite visit to the Project’s management site in Quonset, RI the TPI-In Water will meet with the Onsite Installation Manager (OMI) and observe all Project activities occurring between 0700-1900 (unless outside hours are requested by CRMC). When the vessels are in port, the TPI-In Water will complete vessel walk throughs to review vessel operations that would occur on each Project vessel. At the end of each week the TPI-In Water will submit a weekly report to the CRMC. Additional reporting requirements for site visits are outlined in [Section 4.2.3.2](#)

Reports to: CRMC Staff

Stop work authority: Yes

Activities undertaken by the TPI-In Water may include the following tasks and/or observations and reporting on the following activities:

- Attendance at safety meetings conducted by the Construction Contractor and sign tailboard when onsite;
- Monitoring and supporting Construction Contractor compliance with the environmental management and protection requirements specified by all applicable permits and approvals, and closely coordinating with the OMI for compliance with these provisions;
- Attending meetings with the OMI regarding cable operations that are anticipated to begin, have completed or are in progress;
- Submit detailed weekly reports to CRMC regarding all cable operations; and
- Observation of in-water activities associated with HDD landfall and work in state waters.

3.5.3 Safety Inspector

One Safety Inspector will be assigned to the Project to inspect the work site. The Safety Inspector is expected to cover multiple workspaces.

Reports to: Project HSE Manager

Stop work authority: Yes

Responsibilities:

- Attendance and participation in daily safety meetings and pre-job safety briefings;
- Development, review and/or approval of job hazard assessments (JHAs) of Project's specific Health and Safety Plans (HASP);
- Project safety on-boarding;
- Field observations, conducted daily, to ensure all work is in accordance with the Eversource and Orsted Contractor Safety Policy and Work Rules;
- Provide weekly summaries of Project safety activity, observation data and corrective actions completed or recommended;
- Identify and document observations of OSHA standards and regulations gaps or opportunities for compliance improvement;
- Participation and review of incident investigations;
- Industrial Hygiene related activities;
- Supporting safety management systems;
- Assisting in the establishment and implementation of regulatory compliance and incident-prevention activities regarding the safety and health of employees, Contractor, and subcontractor personnel, and the public as they interact with Revolution Wind's operations;
- Assisting management and directing safety specialists in analyzing any safety related incidents, and;
- Advising management in problem-solving/decision-making to eliminate hazards and to develop incident-prevention and regulatory compliance programs to reduce incidents that may lead to personal injury and property damage.

3.5.4 Fisheries Representative (FR)

A fisheries Representative (FR) will be provided to the Project. The FR will help facilitate communication and collaboration with the local fishing communities. Throughout Project construction, the FR will collaborate with multiple Fisheries Liaisons (FL).

Activities undertaken by the FR may include the following tasks and/or observations and reporting on the following activities:

- Engage with the fishing community regional meetings and events within project scope;
- Use Zoom and/or Microsoft teams to communicate with communities;
- Use the online fisheries outreach form to collect and document local fishing communities' thoughts and/ or concerns;
- Maintain log of fisherman contacts along with vessel type and name. The compiled list will include vessels in the lease area and cable routes. List will be shared with the FL;

- Develop and maintain a stakeholder list: local fishing community members, officials, and organizations. List will be shared with the FL;
- Distribute project information and outreach documents to the local communities;
- Meetings with the FL to provide review of best management practices and/or client mitigation methods;
- Assist with impartial review of claims requested by the FL in an unbiased manner;
- Regular communication with the FL;
- Provide weekly reports of fisheries engagement activity. Reports will include:
 - New fishing community contacts
 - Current fishing activity in lease area
 - Upcoming community events and/or meetings
 - All project information that was disseminated
- Maintain a timesheet of activities performed.

4.0 Construction Compliance

4.1 CONSTRUCTION ORIENTATION

Overall Project construction will commence following a Project Orientation training comprised of a kick-off meeting, which will include compliance training and Project orientation. All Project personnel will be required to attend the Project Orientation training. This training will, at a minimum, include a discussion of all relevant permit and authorization compliance conditions, provide an overview of Project personnel and construction staff, and outline Project construction activities and timelines. At this orientation, if not prior, all Construction Contractors shall receive complete copies, including any amendments and modifications, of the Certificate, any permit issued pursuant to Section 404 of the Federal Clean Water Act, the Section 401 Water Quality Certification, and the federal consistency decision issued pursuant to the federal Coastal Zone Management Act, RIDEM authorizations and permits and all CRMC approvals and permits. Project training and orientation for onshore and offshore construction crews may differ slightly, but each training course will cover all necessary and pertinent compliance information for the activities they will be performing.

Compliance training and site orientation will subsequently be provided to all new construction contractors on site, prior to commencing work activities. These trainings and site orientations will be scheduled and administered by the CM and ECM when on site, or delegated to an FI or Construction Contractor, as appropriate.

At a minimum, the CM and ECM will prepare a PowerPoint or a recorded training and, in coordination with the FI, provide compliance training brochures and hard hat stickers to the Construction Contractor upon completion of the training. The CM, ECM and FI will track attendance at compliance training.

4.2 MONITORING, INSPECTIONS AND REPORTING

4.2.1 Compliance Management Tool (CMT)

The CMT will serve as a document library, interactive data repository (e.g., storage and querying for data), and compliance management register for the Project. The Siting Manager(s), PM and CM and ECM will be responsible for management of the CMT. The ERA Manager and EPC Director will also have access to the CMS for reviewing reports.

4.2.2 Contractor Transmittals

The Project will utilize a contractor management system (e.g., Procore or e-Builder) to track schedule, cost, and changes. Official communications between the Owner, CM, ECM, and Construction Contractor will utilize this system.

4.2.3 Environmental Inspection and Weekly Status Reports

The FI(s) and TPI(s) will perform routine environmental inspections during the construction and restoration phases of onshore and offshore components of the Project.

4.2.3.1 FI Inspections and Reporting

A FI will be on site whenever ground disturbance is occurring and may spot check multiple locations throughout the day, unless there is an Owner directive to monitor full-time at a particular location. The FIs will fill out an Inspection and/or Tracking Report detailing the tasks performed on site, any compliance issues, and any corrective actions taken or recommended. Inspection Reports shall detail the location of the inspection for each of the following Project components:

- Offshore Wind Lease Area;
- Export Cable – RI State Waters;
- HDD Work Zone (both onshore and offshore work sites);
- Onshore Cable;
- Onshore Substation; and,
- Interconnection Facility

An Inspection Report will be completed for each scheduled workday even if no work has been performed during that day. The Inspection Reports will be prepared and submitted via a submittal process approved by the Owner, such as through the CMT, and will be reviewed by the CM and ECM prior to submitting to the Siting Manager(s) and PM. Inspections will conclude upon the final sign-off of the SWPPP by the CM.

4.2.3.2 TPI Inspections and Reporting

The TPIs (either Onshore or In-Water) will be onsite 3 times a week from 0700-1900 during construction. An Inspection Report will be filled out for each scheduled workday even if no work has been performed during that day. These reports will be submitted directly to the CRMC by the TPI with a carbon copy to the Project's ECM.

4.2.4 SWPPP Inspection Reporting – frequency

A Qualified Inspector/FI will complete a SWPPP Inspection and Maintenance Report Form after each inspection according to the RIPDES authorization. A copy of the SWPPP and copies of all inspection reports will be kept on-site until Project-related disturbed areas have achieved final stabilization.

Each Construction Contractor shall identify at least one person from their company that will be responsible for implementation of the SWPPP within their scope of work. This person will be known as the Trained Contractor. During soil disturbance activities, the Trained Contractor will be available to oversee SWPPP best management practices (BMPs) and procedures and inspect equipment for substance leaks and debris. Each Construction Contractor will have a Trained Contractor inspect the erosion and sediment control BMPs and pollution prevention measures being implemented within the active work area daily to monitor that they are being maintained in effective operating condition at all times. If deficiencies are identified, the Construction Contractor will consult with the FI to develop a corrective action plan. The corrective action plan will identify the cause of the deficiency, outline the correcting action, and establish a timeframe for implementation. The CM will be responsible for documenting that the corrective action is complete and/or outstanding items. These will be enumerated within the weekly reports and reviewed at the monthly internal audit meeting.

4.3 STOP WORK AUTHORITY

On-site Project personnel with stop-work authority include the PM, CM, ECM, IEM, EPCD, CS, FIs (limited offshore), TPIs (Onshore or In-Water) and Site Package Managers. These Project personnel may stop

work during construction if any of the environmental compliance terms of the Project's applicable permits, approvals, agreements, and other regulatory or non-regulatory commitments have been violated or are about to be violated without work stoppage. All Project personnel have stop-work authority for health and safety reasons.

4.4 COMPLIANCE VIOLATIONS

The objective of the compliance program is to have the Construction Contractor(s) maintain environmental vigilance to achieve an acceptable inspection (e.g., conformance with Project compliance requirements) at each work site. Inspections may cover a range of activities that could indicate non-conformance with applicable permits, approvals, agreements, and other regulatory or non-regulatory commitments. Inspections may include observations, corrective actions, and non-compliance/violations, as described below. Non-conformance with Project approvals, agreements, and other regulatory or non-regulatory commitments does not in all cases reflect adverse effects on the environment. For example, inspections could indicate Construction Contractor failure to plan appropriately for work in sensitive areas to inadequate placement or maintenance of protective measures, or non-conformance with final plans and approvals. Although the FIs have primary responsibility for conducting compliance assessments, non-compliance may be identified and reported by Project Management, the CM, ECM, EPCD, either TPI (Onshore or In-Water), Site Package Managers, the Siting Manager(s), and the ERA Manager.

Non-compliances will be reported within daily inspection and weekly status reports and discussed at monthly internal and agency compliance audits. The level of non-compliance will be initially assigned at the discretion of the FI, CM and ECM but can be changed at the discretion of the CM, ECM, EPCD, Site Package Managers, or Project Manager.

Level 0 – Observation

Observations (Level 0) are areas inspected by the FI that are in good order without any reason to notify the on-site construction crews of corrective actions. Level 0 observations are intended to track the construction activities of the Project and demonstrate that all work is being completed in compliance with all applicable permits and regulations.

Level 1 – Observation

Level 1 Observations are notifications to the Construction Contractor by an FIs, TPI (Onshore or In-Water), ECM or the CM, or a regulatory agency. These observations are warnings to the Contractor of potentially inadequate controls or techniques. Observations are issued for areas that are presently in compliance but may require maintenance, additional, and/or different controls to remain in compliance and/or prevent a potential future corrective action (Level 2). Examples of Level 1 Observations are minor repairs that should be made to erosion and sediment control BMPs (that are still functioning) and general housekeeping.

If not addressed in a timely fashion, Level 1 Observations may be elevated to a higher tier at the discretion of the CM, ECM, Site Package Managers, Siting Manager(s) or Project Manager.

Level 2 – Corrective Action

Corrective Action (Level 2) involves a notification to the Construction Contractor by a Fis, TPI (Onshore or In-Water), ECM or the CM, or a regulatory agency during an inspection. Level 2 Unsatisfactory Performances are issued when controls/areas require more than typical maintenance and need to be repaired, replaced, and/or restored. Examples of a Level 2 non-compliance are sites where environmental controls have failed, or are in need of significant repair, and if not addressed may result in an unauthorized release. A Level 2 incident includes any repeat of a previously observed Level 1 occurrence at a given site or by a given Construction Contractor or crew.

Level 3 – Non-compliance/violation

A Level 3 Non-Compliance involves a notification by an FIs, TPI (Onshore or In-Water), ECM or the CM, Site Package Managers, a regulatory agency, and/or Owner that one or more construction activities involve Unsatisfactory Performance requiring immediate action. Examples of a Level 3 incident may be direct violations of Certificate conditions such as improper handling of rare, threatened, or endangered species or improper reporting of a spill. Level 3 non-compliance may include a Level 2 incident that has gone unaddressed. A “site-specific stop-work order” may be issued at this level of Unsatisfactory Performance.