

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Application of Sunrise Wind LLC for a Certificate of Environmental Compatibility and Public Need for the Construction of Up to 6.2 Miles (320 kilovolt [kV]) of Direct Current (DC) Submarine Export Cable from the New York State Territorial Waters Boundary to the Smith Point County Park on Fire Island in the Town of Brookhaven in Suffolk County and Up to 17.5 Miles (320 kV) of Onshore Transmission Cable from the Landfall at Fire Island to a New Onshore Converter Station in the Town of Brookhaven and Up to 1 Mile (138 kV) of Alternating Current (AC) Onshore Interconnection Cable Connecting to the Existing Holbrook Substation in the Town of Brookhaven in Suffolk County

Case 20-T-0617
Deficiency No. 12

**SUNRISE WIND LLC's
RESPONSE TO DEFICIENCY NOTICE**

Deficiency No. 12

16 NYCRR §86.5(b)(7) requires the Applicant to describe “[i]f any, types, volumes, and manner of use of pesticides/herbicides.” Exhibit 4 of the Application does not identify or describe whether use of pesticides/herbicides are proposed as part of construction or maintenance activities, including around the proposed converter station. Please describe whether use of any pesticides or herbicides are proposed for construction or long-term vegetation management within the Project ROW, including around the proposed converter station. If use of pesticides and/or herbicides are proposed, please describe the types, volumes, and manner of use for each.

Sunrise Wind's Response:

The Applicant will use mechanical clearing methods for the construction of the Project and does not intend to use any pesticides/herbicides during construction and installation. The Applicant does not intend to use pesticides during operation of the Project. The Applicant's intended use of herbicides during operations and maintenance (O&M) of the Project is described below.

Since the Onshore Transmission Cable is all underground and almost entirely within currently maintained roadways, the use of herbicides for operation and maintenance is expected to be minimal along the Onshore Transmission Cable corridor.

Because the parcels are already developed, the selection of the Union Avenue South Site for the converter station will result in less construction clearing and also reduces the need for herbicides during O&M. The Union Avenue South Site is surrounded by active businesses with almost no existing vegetation.

The Onshore Interconnection Cable will be potentially constructed within an existing maintained transmission ROW, and the Applicant will likely coordinate vegetation management activities with the existing utility and use the same or similar methods of clearing that have been approved for that activity.

While the vegetation management requirements for the Project are expected to be minimal, the use of herbicides to effectively manage the vegetation for reliability purposes will be considered as a part of an effective Integrated Vegetation Management (IVM) program. IVM practices include manual cutting, mowing, and the prescriptive use of federally approved and NYS registered herbicides to eliminate targeted plant species within the ROW. Herbicides are an integral part of the IVM program and will be applied, using federally approved, NYS listed herbicides, following all NYS and local regulations and label restrictions.

More specific details on the volume, type, and manner of use of herbicides as part of the IVM program will be provided within the Project Environmental Management and Construction Plan (EM&CP).